

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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R.J. ZAYED, IN HIS CAPACITY AS  
COURT- APPOINTED RECEIVER FOR  
TREVOR G. COOK, ET AL.,  
Petitioner,

Case No. 11-CV-01042 SRN/FLN

vs.

DAVID BUYSSE, STEVEN AND  
PAMELA CHENEY, WALTER DEFIEL,  
JOHN DZIK, TERRY FRAHM,  
STEVEN AND JENENE FREDELL,  
WILLIAM HARRIS, MICHAEL HEISE,  
MICHAEL AND CYNTHIA HILLESHEIM,  
LARRY HOPFENSPIRGER, STEVEN  
KAUTZMAN, JAMES MCINTOSH,  
GEORGE AND KAREN MORISSET,  
AND REYNOLD SUNDSTROM, AND  
DOT ANDERSON,

Respondents.

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**LENDER RESPONDENTS' MOTION TO EXTEND SCHEDULING ORDER**

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TO: THE RECEIVER, AND HIS ATTORNEYS, TARA NORGARD, RUSSELL J. RIGBY AND PETER K. KOHLHEPP, CARLSON, CASPERS, VANDENBURGH & LINDQUIST, P.A., 225 S. SIXTH ST., SUITE 3200, MINNEAPOLIS, MN 55402.

**MOTION**

Lender Respondents Steven and Pamela Cheney, David Buysse, Walter Defiel,  
Steven and Jenene Fredell, Michael and Jennifer Heise, Michael and Cynthia Hillesheim,

Larry Hopfenspirger, Steven Kautzman, James McIntosh, George and Karen Morisset, Terry Frahm, and Reynold and Judith Sundstrom move the Court as follows:

1. For an Order under Federal Rule of Civil Procedure 16(b)(4) and Local Rule 16.3 extending the Deadlines to contained in the Scheduling Order to the following dates:

Deadline		Current Order		Amended Order
Fact Discovery		July 1, 2011		August 1, 2011
Disclosure of Experts and Reports		May 1, 2011		July 1, 2011
Disclosure Rebuttal Experts and Reports		June 1, 2011		August 1, 2011
Expert Depositions		N/A		September 1, 2011
Non-Dispositive Motions – filed and served		July 1, 2011		September 1, 2011
Dispositive Motions – filed briefed and scheduled for hearing		September 1, 2011		November 1, 2011

Trial Ready Date		November 1, 2011		January 1, 2011
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2. For expedited hearing on this Motion, to be heard on May 9, 2011, for good cause under Fed. R. Civ. Pro. 6(c)(1)(C).
3. For such other and further relief as the Court may deem just and proper.

This Motion will be based on the Lender Respondents' Memorandum of Law in Support of the Motion, the Declarations of Gregory M. Erickson and William F. Mohrman with attached Exhibits, and arguments of counsel. The Court is authorized to grant this relief as an exercise of its discretion as expressed in Fed. R.Civ.Pro. 6, 16, and 37 and by applicable federal case law.

Dated: April 28, 2011.

**MOHRMAN & KAARDAL, P.A.**

s/William F. Mohrman  
 William F. Mohrman (#168816)  
 Gregory M. Erickson (#276522)  
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