SO ORDERED
Docket #0034 Date Filed: 3/4/2026

March 4, 2026
Kathy A. Surratt-States
Kathy A. Surratt-States
UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re: BRIGGS & STRATTON CORPORATION, *et al.*, Debtors.	Chapter 11 Case No. 20-43597-659 (Jointly Administered)
ALAN D. HALPERIN, solely as Plan Administrator of the Wind-Down Estates of Briggs & Stratton Corporation, Plaintiff, v. STATE OF NEBRASKA, NEBRASKA WORKERS' COMPENSATION COURT and ZURICH-AMERICAN INSURANCE COMPANY, Defendants.	Adversary No. 25-04044-659

CONSENT MOTION TO CONTINUE AND EXTEND DEADLINES RELATED TO HEARING ON MOTION TO DISMISS

Alan D. Halperin, solely as Plan Administrator (the "Plan Administrator") under the *Amended Joint Chapter 11 Plan of Briggs & Stratton Corporation and its Affiliated Debtors*, dated November 9, 2020 [Docket No. 1226] (the "Plan"),[1] by and through undersigned counsel, files this Consent Motion to Continue and Extend Deadlines Related to Hearing on Motion to Dismiss states as follows:

[1] Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

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Background

1. On August 1, 2025, the Plan Administrator initiated the above-captioned adversary proceeding.

2. On February 10, 2026, Defendants Nebraska Worker's Compensation Court and the State of Nebraska (collectively, the "Nebraska Defendants") filed their Motion to Dismiss [Dkt. 28] (the "Motion to Dismiss").

3. Pursuant to this Court's scheduling order dated February 20, 2026 [Dkt. 31], the Plan Administrator's response deadline to the Motion to dismiss is presently set for March 3, 2026.

4. Since the filing of the Motion to Dismiss, the Plan Administrator and the Nebraska Defendants have discussed the potential for resolution and have agreed as a part of these discussions to an extension of the Plan Administrator's response deadline and a continuance of the existing hearing date on the Motion to Dismiss.

5. The Plan Administrator hereby requests an extension until April 14, 2026 (the "Extended Deadline"). The Nebraska Defendants have consented to this extension on the condition that the Extended Deadline be at least 28 days prior to the hearing on the Motion to Dismiss.

6. The parties further request that the hearing on the Motion to Dismiss be continued until May 12, 2026 at 10:00 a.m.

WHEREFORE, the Plan Administrator, for the reasons stated herein, respectfully asks that this Court enter an Order granting Defendant an extension of time to file a response to the Motion to Dismiss until April 14, 2026, continuing the hearing on the Motion to Dismiss until May 12, 2026, and for any other relief this Court deems just and proper.

Dated: March 3, 2026
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann
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-and-

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Counsel to the Plan Administrator

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 3, 2026, a true and correct copy of the above and foregoing pleading was filed with the Clerk of the Court using the CM/ECF system, and the Notice of Electronic Filing indicates that all necessary parties were served with the document via the Court's CM/ECF.

/s/ Robert E. Eggmann