SO ORDERED
Docket #0035 Date Filed: 3/6/2026
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.

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
Robert E. Eggmann, #37374MO
Christopher J. Lawhorn, #45713MO
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Local Counsel to the Plan Administrator

-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

United States Bankruptcy Court

Eastern District of Missouri

Alan D. Halperin, solely as Plan Adminis,
Plaintiff

Adv. Proc. No. 25-04044-kss

State of Nebraska,
Defendant

CERTIFICATE OF NOTICE

District/off: 0865-4 User: admin Page 1 of 2

Date Rcvd: Mar 04, 2026 Form ID: pdfo1 Total Noticed: 5

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 06, 2026:

Recip ID		Recipient Name and Address
dft	+	Nebraska Workers' Compensation Court, 1445 K St., Lincoln, NE 68508-2731

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID		Notice Type: Email Address	Date/Time	Recipient Name and Address
ust	+	Email/Text: ustpregion13.sl.ecf@usdoj.gov	Mar 04 2026 23:12:00	Office of US Trustee, 111 S Tenth St, Ste 6.353, St. Louis, MO 63102-1127
ust	+	Email/Text: ustpregion13.sl.ecf@usdoj.gov	Mar 04 2026 23:12:00	Paul A. Randolph, Office of U.S. Trustee, 111 S. 10th St., Ste. 6353, St. Louis, MO 63102-1125
dft	+	Email/Text: NEDOJ@nebraska.gov	Mar 04 2026 23:10:00	State of Nebraska, c/o Nebraska Attorney General's Office, Attn: Corporate Bankruptcy, Dept. 2115, PO Box 98920, Lincoln, NE 68509-8920
dft	+	Email/Text: usz.bankruptcy.legal.coll@zurichna.com	Mar 04 2026 23:11:00	Zurich-American Insurance Company, 1299 Zurich Way ZAIC, Schaumburg, IL 60196-1091

TOTAL: 4

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 06, 2026 Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 4, 2026 at the address(es) listed

below:

Name	**Email Address**
Robert A. Breidenbach	on behalf of Defendant State of Nebraska rbreidenbach@mmrltd.com
Robert A. Breidenbach	on behalf of Defendant Nebraska Workers' Compensation Court rbreidenbach@mmrltd.com
Robert E Eggmann, III	on behalf of Plaintiff Alan D. Halperin solely as Plan Administrator of the Wind-Down Estates of Briggs & Stratton Corporation ree@carmodymacdonald.com, thr@carmodymacdonald.com;ala@carmodymacdonald.com;kxd@carmodymacdonald.com;ree@ecf.courtdrive.com

TOTAL: 3