

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:

BRIGGS & STRATTON CORPORATION, *et al.*,

Debtors.

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.

In Proceedings Under Chapter 11
Hon. Kathy A. Surratt-States

Case No. 20-43597-659
(Jointly Administered)

Adversary No. 25-04044-659

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

COME NOW the Nebraska Workers' Compensation Court and the State of Nebraska (collectively, the "Movants") and in support of their *Motion for Extension of Time to Respond to Complaint* (the "Motion"), state to this honorable Court as follows:

1. Plaintiff commenced this action on August 1, 2025. In its Complaint, Plaintiff purports to seek declaratory relief, turnover, damages and additional relief against Movants and against a surety bond issuer.

2. Movants are the state of Nebraska and the Nebraska Workers' Compensation Court, a judicial branch of the state of Nebraska.



3. On August 6, 2025 this Court issued a Summons [Doc. No.4] which provides that Movants are to file a motion or answer to the Complaint on or before the expiration of thirty (30) days from the date of issuance of the Summons. As such, Movants' response deadline under Rules 7007, 7012, 7013, and 9006 of the Federal Rules of Bankruptcy Procedure is September 5, 2025 (the "Response Date").

4. Movants are a sovereign state and a judicial branch of that sovereign state. In order to appropriately respond to the Complaint in this action, Movants will need to review applicable statutes and rules, communications between and among them and Debtor, communications between and among them and Plaintiff in this matter, and relevant documents. In addition, prior to submitting a response to the Complaint, appropriate approvals will be required from officials of the state of Nebraska. As such, Movants respectfully request that the Response Date in this action be extended for Movants through and including October 6, 2025.

5. The undersigned has contacted both lead and local counsel for Plaintiff and has obtained their consent to this request.

6. This request is made timely under Rule 9006 of the Federal Rules of Bankruptcy Procedure.

7. Movants respectfully submit that the foregoing constitutes good and sufficient cause under Rule 9006(b) and further that this request is not made for an improper purpose. Rather, the request is made, with consent of Plaintiff and in order to allow Movants sufficient time to fully respond to the Complaint.

WHEREFORE, Movants respectfully request that this honorable Court grant this Motion, that the Court extend the Response Date through and including October 6, 2025, and that the Court grant Movants such additional and further relief as is just and proper.

MATHIS, MARIFIAN, & RICHTER, LTD.

By: /s/ Robert A. Breidenbach

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Attorneys for State of Nebraska and the
Nebraska Workers' Compensation Court

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served this 4th day of September, 2025, by first-class mail, postage prepaid, to the following parties, unless said parties received service by electronic means:

Robert E Eggmann, III
Christopher J. Lawhorn
Thomas H. Riske
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Client (via e-mail)

/s/ Robert A. Breidenbach

**UNITED STATES BANKRUPTCY COURT
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In Proceedings Under Chapter 11
Hon. Kathy A. Surratt-States

Case No. 20-43597-659
(Jointly Administered)

Adversary No. 25-04044-659

**ORDER GRANTING
MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Came before the Court the the *Motion for Extension of Time to Respond to Complaint* (the "Motion") filed by the Nebraska Workers' Compensation Court and the State of Nebraska (collectively, the "Movants"). Upon due consideration of the record as a whole and the argument of counsel, the Court finds that good and sufficient cause exists to grant Movants the relief requested in the Motion. **THEREFORE:**

IT IS HEREBY ORDERED that the Motion is **GRANTED**;

IT IS FURTHER AND HEREBY ORDERED that the deadline for the Nebraska Workers' Compensation Court and the State of Nebraska to file a motion or pleading in response to the Complaint in this action is extended through and including October 6, 2025.

SO ORDERED:

United States Bankruptcy Judge.

Order Prepared by:

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