

**FORMAN HOLT ELIADES
& YOUNGMAN LLC**

80 Route 4 East, Suite 290
Paramus, New Jersey 07652
(201) 845-1000
Harry M. Gutfleish

PATTERSON BELKNAP WEBB & TYLER LLP

1133 Avenue of the Americas
New York, New York 10036-6710
(212) 336-2000
Daniel A. Lowenthal (admitted *pro hac vice*)
Brian P. Guiney (admitted *pro hac vice*)

Co-Counsel for the Tarragon Creditor Entity

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
In re: TARRAGON CORPORATION, et al., Debtors.

Chapter 11
Case No. 09-10555 (MBK)
Jointly Administered

**Return Date: March 30, 2015
10:00 a.m.**

**AMENDED NOTICE OF MOTION OF THE TARRAGON
CREDITOR ENTITY FOR ENTRY OF AN ORDER
EXTENDING THE DEADLINE TO OBJECT TO CLAIMS**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on March 30, 2015, at 10:00 a.m., or as soon thereafter as counsel may be heard, the Tarragon Creditor Entity (the “TCE”) formed pursuant to the confirmed Second Amended and Restated Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code dated May 11, 2010 (the “Plan”), through its undersigned counsel and by its trustee, WBT LLC, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the **United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Courtroom #8, Trenton, NJ 08608**, for entry of an Order



extending the TCE's time to object to Claims (as defined in the Plan) (the "Motion").

PLEASE TAKE FURTHER NOTICE that the TCE shall rely on the accompanying Application in support of the relief requested. The TCE has submitted a proposed form of Order in accordance with Local Bankruptcy Rule 9013-1(a).

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Bankruptcy Rule 9013-2, the TCE has not submitted a brief since the Motion does not present any novel or complicated issues of fact or law.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the relief sought shall conform with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, shall be filed with the **Clerk of the Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608** and, pursuant to Local Bankruptcy Rule 9013-1(d), shall be served upon the undersigned so as to be received no later than seven (7) days prior to the return date.

PLEASE TAKE FURTHER NOTICE that unless responses are timely filed and served, the Motion shall be deemed uncontested in accordance with Local Bankruptcy Rule 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the TCE waives oral argument unless responses to the Motion are timely filed.

Dated: March 3, 2015

FORMAN HOLT ELIADES & YOUNGMAN LLC

By: /s/ Harry M. Gutfleish
Harry M. Gutfleish

80 Route 4 East, Suite 290
Paramus, New Jersey 07652
(201) 845-1000
(201) 845-9112 (fax)

- and -

PATTERSON BELKNAP WEBB & TYLER LLP
Daniel A. Lowenthal (admitted *pro hac vice*)
Brian P. Guiney (admitted *pro hac vice*)
1133 Avenue of the Americas
New York, New York 10036-6710
(212) 336-2000
(212) 336-2222 (fax)

Co-Counsel for the Tarragon Creditor Entity