IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN RE:

HILLSBOROUGH HOLDINGS CORPORATION, ET AL.,

Case Nos. 89-9715-8P1 through 89-9746-8P1 and No. 90-11997-9P1

Debtors.

HILLSBOROUGH HOLDINGS CORPORATION, ET AL.,

Plaintiffs,

v.

Adv. Proc. No. 91-313-KRM

UNITED STATES OF AMERICA,

Defendant.

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JOINT MOTION TO CONTINUE STATUS CONFERENCE

Plaintiffs, Hillsborough Holdings Corp., et al., by and through their undersigned attorneys, hereby file the Joint Motion to Continue Status Conference (the "**Motion**"), and state:

1. The above-styled adversary proceeding was filed on May 14, 1991.

2. On June 22, 2010, the Court entered its Order (Doc. No. 403) vacating the Final Judgment previously entered on June 9, 2010 (Doc. No. 400) and directing the parties to submit a proposed final judgment addressing all issues that have been resolved through proceedings before the Court or by agreement of the parties for all taxable years

under this Court's jurisdiction. The Court directed the parties either to submit the proposed final judgment or to file a joint status report apprising the Court of the status of the preparation of the proposed final judgment.

3. A status conference was held on May 31, 2011, and continued to September 15, 2011 at 1:30 p.m.

4. On September 12, 2011, the parties filed their Joint Status Report Pursuant to Paragraph 3 of the Court's Order Vacating Final Judgment Dated June 22, 2010 (Doc. No. 417) (the "**Joint Status Report**").

5. The parties advised the Court in the Joint Status Report that substantial progress has been made in their negotiations, and that the negotiations have been expanded to include settlement of all matters pending before the Court in this Adversary Proceeding. Further, the Court was advised that the parties require additional time to accomplish the proposed global settlement.

6. The parties respectfully request that the Court grant an additional ninety (90) days to submit the proposed settlement. The parties further request that the status conference scheduled for September 15, 2011 at 1:30 p.m. be continued for ninety (90) days.

WHEREFORE, the parties respectfully request that the Court enter and order granting this Motion, and for such other and further relief as this Court deems just.

Dated: September 12, 2011

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing *Joint Motion to Continue Status Conference* was furnished by electronic, CM/ECF transmission on September 12, 2011, to

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