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.

6. The parties filed their Joint Motion to Continue Status Conference (Doc. No. 418) and advised the Court that additional time was needed to accomplish the proposed global settlement. The Court entered its Order Granting Joint Motion to Continue Status Conference (Doc. No. 419) on September 13, 2011, and continued the Status Conference to January 5, 2012.

7. The parties have continued to work diligently to resolve pending issues. An offer has been made which is currently being considered by the Department of Justice and the Internal Revenue Service. The parties estimate that they will finalize their agreement for presentation to the Court in approximately 120 days. The parties request that the status conference scheduled for January 5, 2012 at 1:30 p.m. be continued for 120 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: December 28, 2011

/s/ Don M. Stichter
Don M. Stichter
Florida Bar No. 078280
Stichter Riedel Blain & Prosser, P.A.
110 E. Madison St., Ste. 200
Tampa, FL 33602
813-229-0144
813-229-1811 (facsimile)
dstichter@srbp.com

and

Stephen D. Gardner
Florida Bar No. 027712
Cooley, LLP
1114 Avenue of the Americas
New York, New York 10036-7798
Phone: (212) 479-6130
Fax: (212) 479-6275
COUNSEL FOR PLAINTIFF
UNITED STATES OF AMERICA, by
ERIC H. HOLDER, JR.
United States of America Attorney General

UNITED STATES ATTORNEY

/s/ Robert L. Welsh
Robert L. Welsh
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 14198
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 514-6068
Fax: (202) 514-9868

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 December 28, 2011, to

Robert L. Welsh
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 14198
Ben Franklin Station
Washington, D.C. 20044

/s/ Don M. Stichter
Don M. Stichter
Florida Bar No. 078280