

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA**

In re:

\_\_\_\_\_ Debtor.

Case No.  
Chapter 11  
Subchapter V

**STIPULATION AND CONSENT SCHEDULING ORDER**

\_\_\_\_\_, (“**Debtor**”) and the United States Trustee (“**UST**”), having conferred regarding an appropriate scheduling order for this case pursuant to 28 U.S.C. § 586(a)(5) and this Court’s General Order 25-05, hereby stipulate to the entry of this order:

1. Debtor shall file and serve an application to employ general bankruptcy counsel no later than \_\_\_\_\_.
2. Debtor shall file and serve applications to employ all other professionals no later than \_\_\_\_\_. Provided, however, Debtor may seek employment of professionals after that date for cause.

3. Debtor shall file and serve a motion for authority to use cash collateral from all necessary or appropriate sources no later than \_\_\_\_\_. Provided, however, Debtor may seek such authority after that date for cause.

4. Debtor shall file an application, and contemporaneously submit a proposed order, establishing bar dates for the filing of claims (other than governmental claims) no later than \_\_\_\_\_.

5. Unless Debtor designates a specific date after confirmation for claim objections to be filed (i) in the Status Conference Report, and (ii) in Debtor's plan, Debtor shall file objections to disputed claims no later than \_\_\_\_\_.

6. Creditors shall make an election under 11 U.S.C. § 1111(b) no later than \_\_\_\_\_.

7. Equity security holders and creditors whose claims are based on a security must be the holder of record as of \_\_\_\_\_.

8. Debtor shall file a proposed disclosure statement (if necessary) and plan of reorganization by \_\_\_\_\_.

9. Contemporaneous with filing the plan, the debtor shall submit to the Court an Order setting deadlines related to plan confirmation, including:

- Date by which ballots accepting or rejecting the plan must be served (or received);
- Identification of the person to whom Ballots should be sent;
- Date by which written objections to confirmation must be filed;
- Statement that copies of any objections must be served on (i) counsel for Debtor, (ii) the Subchapter V Trustee, and (iii) the U.S. Trustee;
- Date and location set for the confirmation hearing (to be obtained from the Court); and
- Directing debtor to serve a copy of the plan and the Order to all required parties within three days of filing the plan.

10. To the extent Debtor files a disclosure statement, contemporaneous with the filing of the debtor's proposed disclosure statement and plan of reorganization, debtor shall obtain a hearing date to determine the adequacy of the disclosure statement; or seek conditional approval of the disclosure statement, pursuant to Rules 3017 and 3017.1 of the FED. R. BANKR. P.

Therefore, in consideration of the foregoing, the parties stipulate and agree, and the Court orders, the deadlines set forth above shall apply in this case subject to further order of this Court.

**All findings of fact are based upon representation of counsel  
pursuant to Local Rule 9013-1(L)(1)(a)**

# # #

Stipulated and approved for entry:

/s/ Debtor's Attorney  
**Debtor's Attorney, OBA#99999**  
ADDRESS.  
ADDRESS  
PHONE NUMBER  
EMAIL  
Attorney for Debtor

UNITED STATES TRUSTEE

s/ Trial Attorney  
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