

FILED
MAR - 6 2003
U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
Deputy Clerk

ENTERED
MAR 10 2003
U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
Deputy Clerk

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Chapter 11 Trustee

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11 Special Litigation Counsel for Plaintiff
R. Todd Neilson, Chapter 11 Trustee

13 UNITED STATES BANKRUPTCY COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 NORTHERN DIVISION

16 In re
17 REED E. SLATKIN,
18 Debtor.

Bk. No.: ND 01-11549-RR
CHAPTER 11
Adv. No. 02-1206

19 R. TODD NEILSON, Trustee of the
20 Chapter 11 Bankruptcy Estate of Reed E.
Slatkin,
21 Plaintiff,

22 SECOND STIPULATION TO EXTEND
TIME TO RESPOND TO
COMPLAINT; ORDER THEREON

22 v.

Status Conference:

23 DANIEL W. JACOBS, individually and in
his capacity as Trustee and on behalf of the
24 DANIEL W. JACOBS MONEY
PURCHASE PLAN DTD 12/23/96 and the
25 DANIEL W. JACOBS PROFIT SHARING
PLAN DTD 12/23/96; MYRNA Y. JACOBS,
individually; and DOES 1-30,

DATE: September 19, 2003
TIME: 10:00 a.m.
PLACE: 1415 State Street
Courtroom 201
Santa Barbara, CA 93101

26 Defendants.

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1 This Stipulation is entered into between Plaintiff R. Todd Neilson (the
 2 "Trustee"), Trustee of the Chapter 11 Bankruptcy Estate of Reed E. Slatkin, and
 3 Defendants Daniel W. Jacobs, Individually and in his capacity as trustee and on behalf of
 4 the Daniel W. Jacobs Money Purchase Plan dated 12/23/96 and the Daniel W. Jacobs Profit
 5 Sharing Plan dated 12/23/96 and Myrna Y. Jacobs, (collectively, the "Defendants") with
 6 respect to the following facts and circumstances:

7 1. On or about November 12, 2002, the Trustee filed his Complaint commencing
 8 this adversary proceeding. The Defendants' responsive pleading was required to be filed
 9 by December 2, 2002.


10 2. In November 2002, the Trustee and the Defendants stipulated to extend the
 11 time for the Defendants to respond to the Complaint from to February 28, 2003. That
 12 stipulation was approved by the Court by order entered November 27, 2002. The purpose
 13 of that stipulation was to enable the parties to pursue settlement discussions.

14 3. To date, defendant Daniel W. Jacobs, in conformance with his plea agreement
 15 with the United States, has turned over certain gold coins to the Trustee. The Defendants
 16 have requested additional time to provide documentation to the Trustee to assist him in
 17 evaluating a possible settlement. The Trustee and the Defendants believe that in light of
 18 their settlement discussions and to enable the Defendants to provide documentation and the
 19 Trustee to evaluate such documentation, a further extension of time for the Defendants to
 20 respond to the Trustee's Complaint is appropriate.

21 4. The parties agree that it is appropriate to continue the due date for
 22 Defendants' responsive pleading to March 31, 2003.

23 Based on the foregoing facts and circumstances, and good cause appearing,
 24 **IT IS HEREBY STIPULATED** that, subject to Court approval, the Defendants have an
 25 extension of time to and including March 31, 2003 within which to file and serve their
 26 responsive pleading to the Complaint.

27
 28 DATED: March 4, 2003

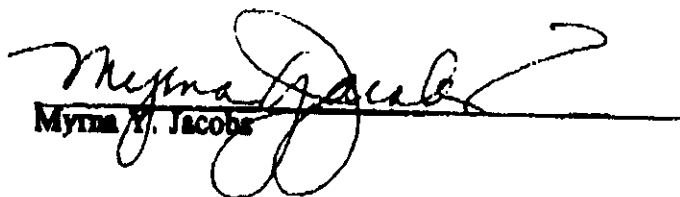


 1. DANIEL W. JACOBS

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Daniel W. Jacobs, individually and in his capacity as trustee and on behalf of the Daniel W. Jacobs Money Purchase Plan dated 12/23/96 and the Daniel W. Jacobs Profit Sharing Plan dated 12/23/98

DATED: March __, 2003


Myrna X. Jacobs

DATED: March 4, 2003

GUMPORT, REITMAN & MONTGOMERY

By: 
John P. Reitman
Attorneys for Plaintiff R. Todd Neilson,
Chapter 11 Trustee

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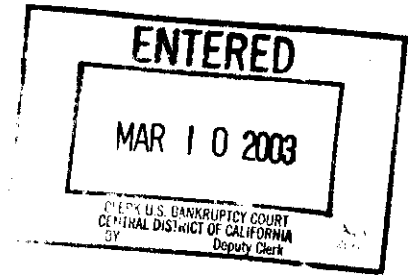
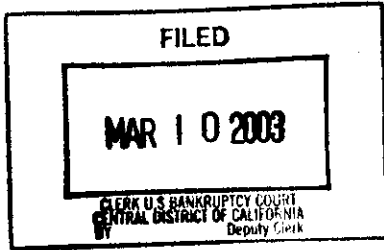
ORDER

The Court having considered the foregoing stipulation, and good cause appearing,
IT IS HEREBY ORDERED that:

The Defendants shall have to and including March 31, 2003 within which to file and serve their response to the Complaint.

DATED: March 10, 2003

Robin Riblet
Honorable Robin L. Riblet
United States Bankruptcy Judge



SERVICE LIST

UNITED STATES TRUSTEE

Brian Fittipaldi, Esq.
Office of the U.S. Trustee
128 East Carrillo Street
Santa Barbara, CA 93101

CHAPTER 11 TRUSTEE

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Bellaire, MI 49615

DEFENDANT

Daniel W. Jacobs
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Burbank, CA 91505-4020

DEFENDANT

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Plan dtd 12/23/96
c/o Daniel W. Jacobs, Trustee
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Bellaire, MI 49615

DEFENDANT

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Plan dtd 12/23/96
c/o Daniel W. Jacobs, Trustee
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