

CIVIL ACTION NO. 3:13-cv-04644-L

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

**JEFFREY BARON,
Appellant**

v.

**DANIEL SHERMAN, *et. al.*
Appellees**

**ON APPEAL FROM THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF

Appellant, Jeffrey Baron, hereby requests the Court grant an order extending the time for filing of Appellant's brief in the above captioned matter and, in support thereof states:

1. The appeal of this matter was docketed and the record transmitted to this Court on November 21, 2013.
2. A continuance is requested due to counsel's heavy deposition and trial schedule. Counsel has also been involved as a principal lawyer and party in conducting the due diligence for a transaction involving restructuring of a corporation that must be completed by the end of December, 2013 and preferably before his pre-paid scheduled vacation.
3. Counsel has a pre-paid vacation to Salt Lake City, Utah to visit family for the holidays starting on December 19, 2013 through December 27, 2013.
4. Counsel is a solo practitioner and has depositions on January 2-4, 2014 and therefore requests that the Court allow Appellant up to and including January 9, 2014 to file his

appellate brief.

5. Counsel is unable to submit an acceptable brief prior to Thursday, January 9, 2014. A shorter briefing schedule will work hardship on counsel for appellant.

Respectfully submitted,

/s/ Stephen R. Cochell
Stephen R. Cochell
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6.

CERTIFICATE OF CONFERENCE

This is to certify that counsel for Appellant requested an extension of time by email dated December 4, 2013 and at the time of filing this motion, had not received a response to the request therefore presuming the motion to be presumed.

s/s Stephen R. Cochell
s/s Stephen R. Cochell

CERTIFICATE OF SERVICE

This is to certify that the above document has been served on all counsel of record by the Court's cm/ecf system and has also been served on John Litzler, Trustee, In re Jeffrey Baron, Case No. 12-37921-sgj7, United States District Court, Northern District of Texas by United States mail at the following address:

John Litzler
Trustee
1412 Main St Ste 2400
Dallas, Texas 75202

s/s Stephen R. Cochell
s/s Stephen R. Cochell