

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE:	)	CHAPTER 11
	)	
BEAULIEU GROUP, LLC, et al.,	)	Jointly Administered Under
	)	CASE NO. 17-41677-bem
Debtors.	)	
_____	)	

**THIRD JOINT STIPULATION EXTENDING OBJECTION DEADLINE**

IT IS HEREBY STIPULATED AND AGREED by PMCM2, LLC, in its capacity as the liquidating trustee of the Beaulieu Liquidating Trust (the “**Liquidating Trustee**”), and Lakeshore Equipment Company d/b/a Lakeshore Learning Materials (“**Lakeshore**”, and together with the Liquidating Trustee, the “**Parties**”, and each singularly, a “**Party**”), that the time within which the Liquidating Trustee is required to file an objection to Lakeshore’s *Request for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503* [Dkt. No. 911] (the “**Administrative Expense Request**”) is hereby extended through and including the date that is thirty (30) days after the later of (a) the date the Court denies approval of the proposed settlement agreement between the Parties, (b) the date that either Party terminates the proposed settlement agreement pursuant to the terms thereof, and (c) in, and only in, the event the proposed settlement agreement is not fully executed, June 30, 2020, and any objection filed by the Liquidating Trustee to the Administrative Expense Request on or before said date shall be deemed timely.

**[Signatures on Following Page]**

This 23rd day of April, 2020.

SCROGGINS & WILLIAMSON, P.C.

THOMPSON, O'BRIEN, KEMP &  
NASUTI, P.C.

By: /s/ Matthew W. Levin

J. ROBERT WILLIAMSON  
Georgia Bar No. 765214  
MATTHEW W. LEVIN  
Georgia Bar No. 448270

4401 Northside Parkway  
Suite 450  
Atlanta, GA 30327  
T: (404) 893-3880  
F: (404) 893-3886  
E: rwilliamson@swlawfirm.com  
mlevin@swlawfirm.com

*Counsel for the Liquidating Trustee*

By: /s/ Michael B. Pugh (with express  
permission by Matthew W. Levin)

ALBERT F. NASUTI  
Georgia Bar No. 535209  
MICHAEL B. PUGH  
Georgia Bar No. 150170  
VIRAJ P. DESHMUKH  
Georgia Bar No. 925812

40 Technology Parkway South, Suite 300  
Peachtree Corners, Georgia 30092  
T: (770) 925-0111  
E: anasuti@tokn.com  
mpugh@tokn.com  
vdeshmukh@tokn.com

*Counsel for Lakeshore Equipment Company  
d/b/a Lakeshore Learning Materials*

**CERTIFICATE OF SERVICE**

This is to certify that I have on this date electronically filed the foregoing *Third Joint Stipulation Extending Objection Deadline* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program, including the following persons:

Albert F. Nasuti  
Vanessa A. Leo

This 23rd day of April, 2020.

SCROGGINS & WILLIAMSON, P.C.

By: /s/ Matthew W. Levin

J. ROBERT WILLIAMSON  
Georgia Bar No. 765214  
ASHLEY REYNOLDS RAY  
Georgia Bar No. 601559  
MATTHEW W. LEVIN  
Georgia Bar No. 448270

4401 Northside Parkway  
Suite 450  
Atlanta, Georgia 30327  
T: (404) 893-3880  
F: (404) 893-3886  
E: rwilliamson@swlawfirm.com  
aray@swlawfirm.com  
mlevin@swlawfirm.com

*Counsel for the Liquidating Trustee*