

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION**

In re:
GREENFIELD SILVER, INC.
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 7
Case No. 09-32228-HJB

MOTION TO EXTEND TIME TO FILE UPDATED SCHEDULES

(Request to Limit Notice)

NOW COMES Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (the “Debtor”) in the above-captioned Chapter 7 case and hereby requests that this Court issue an order continuing the deadline for the Debtor to file updated schedules to the bankruptcy petition. In support thereof, the Debtor respectfully states as follows:

1. On December 18, 2009, the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code with this Court in order to orderly liquidate its assets.
2. On June 1, 2015 the U.S. Trustee filed a motion to convert the bankruptcy case to a chapter 7 petition.
3. On March 2, 2016 the Judge granted the U.S. Trustee's motion and ordered the case to be converted from a chapter 11 to a chapter 7.
4. On March 2, 2016 the Bankruptcy Court issued an order to update the petition schedules.
5. The Debtor requires more time to coordinate with counsel in order to update the schedules.

REQUEST FOR LIMITED NOTICE

6. Request is hereby made to limit notice regarding this Motion upon the following: the U.S. Trustee, the Chapter 7 Trustee, the Debtor, the top twenty unsecured creditors, creditors' committee, Gary Weiner, Esquire as counsel to the creditors' committee, Donald Allison, Esquire (counsel to Realty), Paul Carey, counsel to the Accountant, MassDOR, the Internal Revenue Service and all parties requesting notice.

7. The Debtor submits that due to the nature of this Motion, no further service is necessary.

WHEREFORE, the Debtor respectfully prays:

1. That the Court enter an order extending the deadline for the Debtor to update the bankruptcy petition schedules.
2. That the Court allow the Debtor to limit service as requested.
3. For such further relief as this Court deems just and proper.

Respectfully submitted this 15th day of March, 2016.

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella

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For the Debtor

CERTIFICATE OF SERVICE

I, Edward V. Sabella, counsel to the Debtor in the above-captioned bankruptcy proceeding, do hereby certify that on March 15, 2016, I served electronically and/or by first-class mail, postage prepaid, upon the service list parties (attached as Exhibit A) the following.

Dated this 15th day of March, 2016.

Respectfully submitted,
GREENFIELD SILVER, INC.

By: /S/ Edward V. Sabella
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EXHIBIT A

SERVICE LIST

U.S. TRUSTEE

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Assistant U.S. Trustee
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Worcester, MA 01608

CHAPTER 7 TRUSTEE

Jonathan R. Goldsmith, Esquire
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UNSECURED CREDITORS COMMITTEE

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Alan B. Cabot
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INTERESTED PARTIES

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