

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: : Chapter 11
: :
DG LIQUIDATION CORP., *et al*¹ : Case No. 08-10601 (CSS)
: :
Debtors. : (Jointly Administered)
: :
: **Hearing Date:** **Date to be determined**
: :
: **Objection Date:** **Date to be determined**
: :

**MOTION OF ALFRED T. GIULIANO, PLAN ADMINISTRATOR, FOR AN ORDER
EXTENDING THE DEADLINE TO OBJECT TO CLAIMS**

Alfred T. Giuliano, the Plan Administrator (the “Plan Administrator”) for DG Liquidation Corp. *et al* (the “Debtors”), moves for entry of an Order extending the deadline to object to Claims (as defined under the Debtors’ confirmed plan), and in support thereof, respectfully represents as follows:

Background

1. On April 1, 2008 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. By Order of the Court dated April 2, 2008 [Docket No. 30], the Debtors’ bankruptcy cases were consolidated for procedural, administrative purposes.

the deadline to object to Claims shall be 120 days from the Effective Date; provided, however, the deadline may be extended by the Court upon motion of the Plan Administrator.

3. By Order dated March 25, 2009, the Bankruptcy Court confirmed the Plan [Docket No. 808] (the "Confirmation Order").

4. On April 7, 2009 (the "Effective Date"), the Plan became effective, and the
Notice of (I) Entry of the Confirmation Order

(II) Occurrence of the Effective Date of the Plan, (III) Bar Date for Filing Rejection Damages for Contracts and Leases Rejected through the Plan, (IV) Bar Date for Filing Administrative Expense Claims, and (V) Deadline for Filing Fee Claims [Docket No. 831; Filed 4/7/2009].

Relief Requested

7 More than 760 proofs of claims have been filed in the District since 1984.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]