STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

CASE TYPE: MISC

In Re: Wayzata Home Products, LLC
and cliqstudios.com LLC

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THE ASSIGNEE'S NOTICE OF
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MOTION AND MOTION
TO EXTEND THE STAY

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Assignee in the above-referenced matter, Lighthouse Management Group, Inc., ("Lighthouse" or "the Assignee"), will bring this Motion to Extend the Stay ("Motion") before the Honorable David L. Piper at the Hennepin County Court, 300 South Sixth Street, Minneapolis, MN 55415. The Assignee does not specifically request a hearing on this Motion, but will follow the Court's guidelines for motion hearings during the current COVID-19 pandemic policy. If the court determines a hearing is not necessary, the Assignee proposes any objections should be filed on, or before July 17, 2020. If no objections are received, the Court may grant this motion any time on or after July 28, 2020 without further notice.

If the Court wishes to hold a hearing on this matter, the Assignee requests that the hearing be held *remotely*, via telephonic and/or Zoom appearance, and further requests that the Court provide instructions for parties to attend the hearing remotely.

MOTION

Pursuant to Minnesota Statute § 576.42, Assignee hereby moves this Court for an order extending the stay for an additional one hundred and eighty (180) days, through and including

January 7, 2021, in the above-captioned action. This Motion is supported by the memorandum of law and supporting affidavit, which will be filed in accordance with the Minnesota Rules of General Practice. The Motion is also based on the files, records, pleadings, and other documents previously submitted by the parties, as well as the arguments of counsel presented in written submissions, or argued at a future motion hearing.

Dated: July 7, 2020. Respectfully submitted,

BARNES & THORNBURG LLP

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COUNSEL FOR LIGHTHOUSE MANAGEMENT GROUP, INC.

ACKNOWLEDGMENT REQUIRED BY MINNESOTA STATUTES SECTION 549.211, SUBDIVISION 1

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, subd. 2, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned acted in bad faith, asserted a claim or defense that is frivolous and that is costly to the other party, asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

Dated: July 7, 2020. Respectfully submitted,

BARNES & THORNBURG LLP

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