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Attorney for Grunstead Family Limited Partnership

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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In re : Chapter 11  
LandAmerica Financial Group, Inc., et al :  
: Case No. 08-35994 (KRH)  
Debtors  
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**JOINT MOTION TO EXTEND TIME TO REPLY TO JOINT OBJECTION  
OF THE DEBTOR, THE LES COMMITTEE, AND THE LFG COMMITTEE TO  
PLAINTIFF'S NOTICE OF APPEAL**

LandAmerica 1031 Exchange Services, Inc. ("LES" or "Debtor"), the Official Committee of Unsecured Creditors of LandAmerica 1031 Exchange Services (the "LES Committee") and Plaintiff Grunstead Family Limited Partnership, by counsel, pursuant to Local Rule 9013-1 (K), hereby move the Court for an order extending the time by which Grunstead may file a reply to the Joint Objection of the Debtor, the LES Committee and the LFG Committee to Plaintiff's Notice of Appeal (the "Joint Objection") until July 29, 2009.

1. Grunstead filed its Notice of Appeal on July 9, 2009.
2. The Joint Objection was filed on July 20, 2009 pursuant to Federal Rules of Bankruptcy Procedure 8003(a) and 8003(c).
3. To the extent the Joint Objection is construed as an opposition to a motion by Grunstead for leave to appeal under Bankruptcy Code 158(a)(3), and to the extent Grunstead has

any right to file a reply to such opposition, Grunstead's reply would be due July 23, 2009 under the Local Rules 9013-1(H)(3)(a).

4. The Joint Objection is 15-pages and contains extensive legal arguments. Counsel for Grunstead requires the additional time requested in order to prepare a response to these arguments.

5. Counsel for the LFG Committee has consented to the extension of time requested in this Motion.

5. For the reasons stated above, good cause exists to grant this motion.

**WAIVER OF MEMORANDUM OF LAW**

6. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion and all applicable authority is set forth in the Motion, Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

**NO PRIOR REQUEST**

7. No prior request for the relief sought herein has been made to this Court in this bankruptcy case or to any other court.

**WHEREFORE**, the Movant respectfully requests that this Court enter an order extending the time by which Grunstead may file a Reply to the Joint Objection until July 29, 2009.

Dated: July 23, 2009

Respectfully submitted,

/s/ Thomas R Lynch

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/s/ Lynn Tavenner, Esq. (with permission via  
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Of Unsecured Creditors of LandAmerica 1031  
Exchange Services, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of July 2009, a true and correct copy of the foregoing was served on all persons receiving electronic notice in these cases, including the following:

Dion W. Hayes, Esq.  
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Attorney for Grunstead Family Limited Partnership

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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In re : Chapter 11  
LandAmerica Financial Group, Inc., et al :  
 : Case No. 08-35994 (KRH)  
Debtors : Jointly Administered  
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**ORDER GRANTING JOINT MOTION TO EXTEND TIME TO REPLY TO JOINT  
OBJECTION OF THE DEBTOR, THE LES COMMITTEE, AND THE LFG  
COMMITTEE TO PLAINTIFF'S NOTICE OF APPEAL**

Upon the joint motion ("Motion") of LandAmerica 1031 Exchange Services, Inc. ("LES" or "Debtor"), the Official Committee of Unsecured Creditors of LandAmerica 1031 Exchange Services (the "LES Committee") and Grunstead Family Limited Partnership for an order extending the time in which Grunstead may file a reply to the Joint Objection of the Debtor, the LES Committee and the LFG Committee to Plaintiff's Notice of Appeal (Dkt. 1751), and the Court having reviewed the Motion and any objection thereto, it is hereby,

ORDERED, ADJUDGED AND DECREED that:

1. Good cause exists to grant the Motion, and;
2. The Motion is granted, and;
3. Grunstead shall have until July 29, 2009 to file a response to the Joint Objection.

Dated: July \_\_, 2009

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Kevin Huennekens  
U.S. Bankruptcy Judge

We ask for this:

/s/ Thomas R Lynch

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/s/ Lynn Tavenner, Esq. (with permission via  
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Exchange Services, Inc.*

**Local Rule 9022-1(C) Certification**

The foregoing Order was endorsed by and/or served upon all necessary parties pursuant to Local Rule 9002-1(C).