

**Motion of Nelson for Entry of Order Allowing Late Filing of Proofs of Claim (the “Nelson Extension Motion”)**

By the Nelson Extension Motion, Brian and Victoria Nelson (together, the “Nelsons”) seek permission to file their proof of claim approximately one month after the deadline established for filing proofs of claim (the “Bar Date”).

The Nelsons allege (i) that they are a subsequent purchaser of a home (the “Home”) in Parkland, Florida built by the Debtors, (ii) the Home shows symptoms of, and likely contains, “Chinese Wallboard” and other tainted wallboard (the “Wallboard Claims”), (iii) the Nelsons notified the Debtors of certain symptoms of Chinese Wallboard before the Bar Date, but were not fully apprised of the Wallboard Claims on the Bar Date, (iv) the Debtors did not generally acknowledge the problems of Chinese Wallboard prior to the Bar Date, (v) the Nelsons did not receive notice of the Bar Date, and therefore were prejudiced, and (vi) promptly after learning of the Wallboard Claims and the Bar Date, the Nelsons contacted the Debtors’ counsel and hired counsel to file a proof of claim.

As a result of the foregoing allegations, the Nelsons assert that (i) the Debtors were generally aware of the assertion of the Wallboard Claims prior to the Bar Date, and (ii) allowing the Nelsons to file their claims would not prejudice other creditors.