

**Motion of Florida Chinese Drywall Plaintiffs for Entry of an Order Allowing Late Filed Claim (the “Florida Extension Motion”)**

By the Florida Extension Motion, owners (collectively, the “Movants”) of approximately 32 homes constructed by the Debtors in Parkland, Florida (the “Homes”) seek permission to file their proofs of claim approximately two months after the deadline established for filing proofs of claim (the “Bar Date”).

The Movants allege that (i) as of August 4, 2008 (the petition date), the Debtors had completed construction of the Homes, (ii) the Homes show symptoms of containing tainted drywall imported from China (“Chinese Drywall” and the claims related thereto, the “Drywall Claims”), (iii) the Movants were not fully apprised of the Drywall Claims prior to the Bar Date, (iv) the Debtors did not generally acknowledge the problems of Chinese Drywall prior to the Bar Date, and (v) the Debtors continue to inspect homes in Parkland, and such inspections are scheduled to occur for some of the Movants.

As a result of the foregoing allegations, the Movants assert that (i) they were not aware of the existence of the Drywall Claims prior to the Bar Date and acted expeditiously to have their Drywall Claims deemed timely filed, (ii) the Debtors were generally aware of the assertion of the Drywall Claims prior to the Bar Date, and (ii) allowing the Movants to file their claims would not prejudice other creditors.