

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: RALPH ARNOLD SMITH, JR.  
Debtor**

**CHAPTER 11  
CASE NO. 15-01048-EE**

**MOTION TO EXTEND TIME TO FILE  
DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION**

COMES NOW Ralph Arnold Smith, Jr. (the “Debtor” or “Movant”), and files this his *Motion to Extend Time to File Disclosure Statement and Plan of Reorganization* (the “Motion”), and in support thereof, would show unto the Court the following, to-wit:

1. Movant believes, and on information and belief alleges, that Arnold Smith is going to be released from the State Mental Hospital shortly.
2. Movant’s counsel has never met Dr. Smith and Dr. Smith has (on information and belief) had limited involvement or input into a Disclosure Statement and Plan of Reorganization in this case.
3. Rather than filing a Disclosure Statement and Plan of Reorganization without Dr. Smith’s input, Movant moves the Court for an order granting Movant an additional thirty (30) days within which to finalize, formulate and file the Disclosure Statement and Plan of Reorganization in this case.
4. This is not a request to extend exclusivity, but only a request in the nature of a scheduling order to extend the time to file the Plan and Disclosure Statement.
5. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor prays upon a hearing hereof this Honorable Court will grant the Motion. The Debtor prays for general relief.

This, the 20 day of September, 2016.

Respectfully submitted,

RALPH ARNOLD SMITH, JR.

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: Craig M. Geno  
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)  
[jnichols@cmgenolaw.com](mailto:jnichols@cmgenolaw.com)

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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Ronald H. McAlpin, Esq.  
[ronald.mcalpin@usdoj.gov](mailto:ronald.mcalpin@usdoj.gov)

This, the 20 day of September, 2016.

Craig M. Geno  
Craig M. Geno