

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE:

BRIGGS & STRATTON CORPORATION, *et al.*,

Debtors.

ALAN D. HALPERIN, solely as Plan  
Administrator of the Wind-Down Estates of  
Briggs & Stratton Corporation,

Plaintiff,

v.

STATE OF NEBRASKA, NEBRASKA  
WORKERS' COMPENSATION COURT and  
ZURICH-AMERICAN INSURANCE  
COMPANY,

Defendants.

In Proceedings Under Chapter 11  
Hon. Kathy A. Surratt-States

Case No. 20-43597-659  
(Jointly Administered)

Adversary No. 25-04044-659

**MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

COME NOW the Nebraska Workers' Compensation Court (the "WC Court") and the State of Nebraska (the "State") (collectively, the "Movants") and move this Court for leave to exceed the page limits of Local Rule 9013-1(E) and states as follows:

1. Movants filed contemporaneously herewith a motion to dismiss or abstain in the above-captioned adversary proceeding (the "Motion") [Doc. No. 28].
2. Said Motion raises significant issues of jurisdiction and sovereign immunity, and highlights particular issues regarding the allegations in Plaintiff's Complaint which require more argument than permitted under Local Rule 9013-1(E).



3. Movants have attempted to limit their argument to fifteen (15) pages, but have slightly exceeded that limit (by a single page) and filed their Motion with the expectation of seeking an extension of the limitation in this Court's local rules.

WHEREFORE, Movants request that the Court accept their Motion and that the Court grant Movants such additional and further relief as is just and proper.

STATE OF NEBRASKA, NEBRASKA WORKERS'  
COMPENSATION COURT, Defendants

By: /s/ Robert A. Breidenbach  
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#### CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2026, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of said filing to all CM/ECF participants.

/s/ Robert A. Breidenbach