

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	
	§	CHAPTER 11
BULLIONDIRECT, INC.,	§	
	§	CASE NO. 15-10940-tmd
Debtor.	§	

**MOTION TO EXTEND TIME FOR
FILING RULE 2015.3 REPORT**

COMES NOW BullionDirect, Inc. (“BDI”), Debtor-in-Possession in the above styled proceeding under Chapter 11, and respectfully requests the Court to extend the time to file the *Periodic Report Regarding Value, Operations and Profitability of Entities in Which the Estate of BullionDirect, Inc. Holds a Substantial or Controlling Interest* (“Rule 2015.3 Report”), and in support thereof would respectfully show the Court the following:

1. This Chapter 11 Voluntary Bankruptcy was filed on July 20, 2015, and the first meeting of creditors is scheduled for August 25, 2015, at 1:00 p.m. Debtor has two wholly owned subsidiaries: NBD Holdings, LLC and Nucleo Development Company, LLC. According to Bankruptcy Rule 2015.3, the Rule 2015.3 Report regarding the financial status of these two entities is due on August 18, 2015.

2. This is a Complex Chapter 11 Case dealing with thousands of customers who transacted business related to acquisition, sale or storage of precious metals through the Debtor’s website, www.bulliondirect.com. Subsidiaries were not reported separately for tax purposes. BDI tax returns, done on a consolidated basis, are delinquent for 2011 through the petition date. A significant amount of the data needed for completion of the Rule 2015.3 Report is within the Debtor’s complex database which supported the website. Other portions were recorded in QuickBooks on an infrequent basis. Debtor has had difficulty accessing BDI’s QuickBooks program. Debtor currently has no employees to extract the data, and it will take time for Unique

Strategies Group, Inc. to recover the financial information from the Debtor's system. Previous management has agreed to work with Dan Bensimon and provide the information necessary to prepare the Rule 2015.3 Report. However, the data has not yet been provided, and it may be necessary to employ former employees of Debtor to review the files and produce the necessary information.

3. The Debtor-in-Possession, therefore, needs more time than allowed by the Bankruptcy Code to file the initial Rule 2015.3 Report.

WHEREFORE, the Debtor-in-Possession requests that the time for filing the Rule 2015.3 Report in this case be extended to September 9, 2015, and for such other relief to which it may be entitled.

Respectfully submitted,

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By: /s/ Joseph D. Martinec
Joseph D. Martinec
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PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Motion to Extend Time for Filing Rule 2015.3 Report* has been served via the Court's ECF Noticing System, by First Class Mail, postage prepaid, by facsimile transmission, or by e-mail to the creditors and parties in interest on the current Master Service List on August 18, 2015.

/s/ Joseph D. Martinec
Joseph D. Martinec

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE: §
BULLIONDIRECT, INC., § CHAPTER 11
Debtor. § CASE NO. 15-10940-tmd
§

ORDER EXTENDING TIME FOR FILING RULE 2015.3 REPORT

CAME ON to be considered the Debtor’s *Motion to Extend Time for Filing Rule 2015.3 Report* and, the Court having found that the same should be granted, it is accordingly

ORDERED that the time for filing the initial *Periodic Report Regarding Value, Operations and Profitability of Entities in Which the Estate of BullionDirect, Inc. Holds a Substantial or Controlling Interest* (“Rule 2015.3 Report”) in this case is hereby extended to September 9, 2015.

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Order prepared by:

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