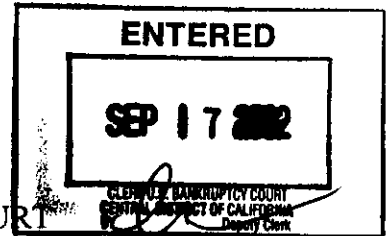
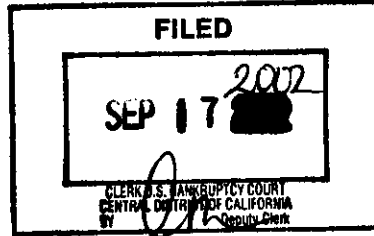


1 LATHAM & WATKINS
Michael S. Lurey, CA State Bar No. 048235
2 Gregory O. Lunt, CA State Bar No. 173297
Shira Roth, CA State Bar No. 217463
3 633 West Fifth Street, Suite 4000
Los Angeles, California 90071-2007
4 Telephone: (213) 485-1234
Facsimile: (213) 891-8763

ORIGINAL

5 Proposed Counsel for
6 Debtors and Debtors-in-Possession



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11 UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RIVERSIDE DIVISION

12 In re
13 CONSOLIDATED FREIGHTWAYS
CORPORATION OF DELAWARE, et al.,
14 Debtors.
15 Fed. Tax I.D. No. 77-0425334

Case No.: RS 02-24284 MG

Chapter 11

(Jointly Administered with Case Nos. RS 02-24287 MG, RS 02-24289 MG, RS 02-24293 MG, RS 02-24294 MG and RS 02-24295 MG)

Hearing:

Times: 10:30 and 11:00 a.m.
Date: October 1, 2002
Place: Courtroom 301
3420 12th Street
Riverside, CA 92501

Judge: Hon. Mitchel R. Goldberg

20
21 **STIPULATION BETWEEN THE DEBTORS AND THE COMMITTEE**
22 **REGARDING EXTENSION OF CERTAIN OBJECTION AND**
23 **REPLY FILING AND SERVICE DEADLINES; ORDER THEREON**

24 TO THE HONORABLE MITCHEL R. GOLDBERG, THE OFFICE OF THE UNITED
25 STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS AND
OTHER PARTIES IN INTEREST:

26 Consolidated Freightways Corporation, Consolidated Freightways Corporation of
27 Delaware, Redwood Systems, Inc., Leland James Service Corporation, CF Airfreight
28 Corporation, and CF MovesU.com Incorporated, debtors and debtors-in-possession herein

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02 SEP 17 PM 2:00

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1 (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors (the
2 “Committee”), by and through their respective counsel, hereby stipulate as follows (this
3 “Stipulation”):

4 RECITALS

5 1. On September 3, 2002 (the “Petition Date”), each of the Debtors filed a
6 voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Court has entered an
7 order granting the joint administration of these chapter 11 cases. The Debtors are continuing to
8 operate their businesses and manage their properties as debtors and debtors-in-possession
9 pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

10 2. On the Petition Date, the Debtors filed, among others, the following
11 motions (the “First Day Motions”):

- 12 a. Emergency Motion for Entry of Interim and Final Orders
13 Authorizing the Debtors to: (i) Obtain Postpetition Financing on a
14 Secured and Superpriority Basis; (ii) Authorizing Use of Cash
15 Collateral; and (iii) Authorizing Termination of Pre-Petition
16 Securitization Facility and Reacquisition of Receivables Subject
17 Thereto;
- 18 b. Emergency Motion for Order Authorizing (i) Continued Use of
19 Existing Business Forms and Records; (ii) Maintenance of Existing
20 Corporate Bank Accounts and Cash Management System; and (iii)
21 Continued Use of Existing Investment Policy;
- 22 c. Emergency Motion for Order (i) Prohibiting Utility Companies
23 from Altering, Refusing or Discontinuing Services and (ii)
24 Establishing Procedures for Determining Requests for Adequate
25 Assurance of Payment for Future Services;
- 26 d. Emergency Motion for Order Authorizing Implementation of
27 Employee Retention Plan; and
- 28 e. Application for Order Authorizing the Retention of Poorman-

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Douglas Corporation as Noticing and Claims Agent to the Debtors and Debtors-in-Possession and Authorizing Poorman-Douglas Corporation to Serve Certain Notices.

3. On September 9, 2002, the Debtors filed the following motions that were served on September 7, 2002 (the "Second Day Motions"):

- a. Motion for Order Authorizing Debtors-In-Possession to Employ and to Compensate Certain Professionals in the Ordinary Course of Business;
- b. Motion for Order Authorizing the Debtors to Reject Certain Equipment Leases, Employment Agreements and Real Property Leases Nunc Pro Tunc to the Petition Date; and
- c. Debtors' Motion for the Establishment of Procedures for Interim Compensation and Reimbursement of Expenses of Professionals.

4. A hearing was held on September 4, 2002, and the Court granted interim relief with respect to the First Day Motions. A hearing with respect to the First Day Motions is set for October 1, 2002, at 10:30 a.m. and a hearing with respect to the Second Day Motions (together with the First Day Motions, the "Motions") is set for October 1, 2002, at 11:00 a.m.

5. The deadline for any party to serve and file an objection (an "Objection") with respect to any of the Motions is September 17, 2002 (the "Objection Deadline") and the deadline for the Debtors or any party in interest (each a "Respondent") to serve and file a reply (a "Reply") to any such Objection is September 24, 2002 (the "Reply Deadline").

STIPULATION

Based upon the foregoing, the parties hereby stipulate, subject to the approval of the Court:

1. The Objection Deadline shall be extended, with respect to the Committee and its members only, until September 23, 2002. Any Objection shall be served upon the individuals set forth in the list attached hereto as Exhibit "A" (the "Service List") by hand delivery, facsimile, electronic mail or such other means so that the Objection is received on or

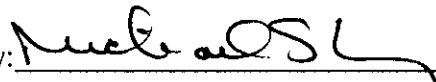
1 before 5:00 p.m. (PDT) on September 23, 2002.

2 2. The Reply Deadline shall be extended, with respect to any Objection by
3 the Committee or any of its members, until September 27, 2002. Each Respondent shall serve
4 each Reply upon the Service List and the party that filed the Objection by hand delivery,
5 facsimile, electronic mail or such other means so that the Reply is received on or before 5:00
6 p.m. (PDT) on September 27, 2002.

7 WHEREFORE, the parties pray this Court to enter an order substantially in the
8 form attached hereto (the "Order") approving and giving effect to this Stipulation.

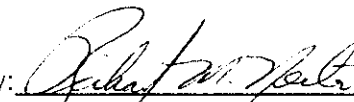
9
10 DATED: September 17, 2002

LATHAM & WATKINS

11
12 By: 
13 Michael S. Lurey
14 Proposed Counsel for the Debtors and
15 Debtors-in-Possession

16 DATED: September 17, 2002

STUTMAN, TREISTER & GLATT

17
18 By: 
19 Richard Neiter
20 Proposed Counsel for the Official
21 Committee of Unsecured Creditors

22 [ORDER ON NEXT PAGE]
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EXHIBIT A

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Timothy J. Farris, Esq. Senior Staff Attorney Office of U.S. Trustee 3420 West 12 th Street Riverside, California 92501 Fax: (909) 276-6973	Bruce S. Schildkraut, Esq. Senior Staff Attorney Office of U.S. Trustee 725 South Figueroa St., 26 th Floor Los Angeles, CA 90017 Fax: (213) 894-2603
Michael S. Lurey, Esq. Latham & Watkins 633 West 5 th Street, Suite 4000 Los Angeles, California 90071 Fax: (213) 891-8763 Proposed Counsel for Debtors and Debtors in Possession	Kathryn J. Halford, Esq. Wohlner Kaplon Phillips Young & Cutler 15760 Ventura Boulevard, suite 1510 Encino, CA 91436 Fax: (818) 501-5306 Counsel for International Brotherhood of Teamsters
Todd C. Meyers, Esq. Kilpatrick Stockton LLP 1100 Peachtree Street, Suite 2800 Atlanta, GA 30309-4530 Fax: (404) 815-6555 Counsel for G.E. Capital Corporation	Eric Sagerman, Esq. Murphy, Sheneman, Julian & Rogers 2049 Century Park East, Suite 2100 Los Angeles, CA 90067 Fax: (310) 788-3777 Counsel for G.E. Capital Corporation

NOTE TO USERS OF THIS FORM:

*Physically attach this form as the last page of the proposed Order or Judgment.
Do not file this form as a separate document.*

In re CONSOLIDATED FREIGHTWAYS CORPORATION OF DELAWARE, et al., Debtor.	CASE NUMBER: RS 02-24284 MG CHAPTER 11 (Jointly Administered With Case Nos. RS 02-24287 MG, RS 02-24289 MG, RS 02-24293 MG, RS 02-24294 MG and RS 02-24295 MG)
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**NOTICE OF ENTRY OF JUDGMENT OR ORDER
AND CERTIFICATE OF MAILING**

TO ALL PARTIES IN INTEREST ON THE ATTACHED SERVICE LIST:

1. You are hereby notified, pursuant to Local Bankruptcy Rule 116(1)(a)(iv), that a judgment or order entitled (*specify*):

STIPULATION BETWEEN THE DEBTORS AND THE COMMITTEE REGARDING EXTENSION OF CERTAIN OBJECTION AND REPLY FILING AND SERVICE DEADLINES; ORDER THEREON

was entered on (*specify date*): **SEP 17 2002**

2. I hereby certify that I mailed a copy of this notice and a true copy of the order or judgment to the persons and entities on the attached service list on (*specify date*):

SEP 17 2002

Dated: **SEP 17 2002**

**JON D. CERETTO
Clerk of the Bankruptcy Court**

By: 
Deputy Clerk

Limited Notice Service List

John P. Brinko
Consolidated Freightways Corporation
16400 S. E. CF Way
Vancouver, WA 98683

Michael S. Lurey
Latham & Watkins
633 West Fifth Avenue
Los Angeles, CA 90071

Alice Whitfield
Poorman-Douglas Corporation
Legal Services, Bankruptcy Division
10300 S. W. Allen Boulevard
Beaverton, OR 97005

Timothy J. Farris
Office of US Trustee
Senior Staff Attorney
3420 Twelfth Street, Suite 200
Riverside, CA 92591

Richard M. Neiter
Stutman, Treister & Glatt
3699 Wilshire Boulevard, Suite 900
Los Angeles, CA 90010