

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLORADO**

In re)	
)	Case No. 10-24238-HRT
SVS HOLDINGS, INC.,)	Chapter 7
)	
and)	
)	Case No. 14-11360-HRT
SEQUOIA VOTING SYSTEMS, INC.,)	Chapter 11
)	
Debtors.)	Jointly Administered Under
)	Case No. 10-24238 HRT

JOINT FILING OF STIPULATED TIMELINE

Pursuant to the Minutes of Proceeding Dated July 7, 2016 [Doc. No. 489] and for the Court’s convenience, the undersigned parties hereby submit their Stipulated Timeline. The parties reserve all rights.

DATED this 26th day of August, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that, on August 26, 2016, I electronically served the foregoing **JOINT FILING OF STIPULATED TIMELINE** via email and first class mail, postage prepaid, to the following:

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s/ Kimberly Means

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**STIPULATED TIMELINE
CASE NO. 10-24238 HRT**

DATE	EXH. #	DESCRIPTION
1990		
12/20/1990	D461, p. 2	Sequoia Pacific Voting Equipment Inc. (later Sequoia Voting Systems, Inc.) Certificate of Incorporation filed in Delaware
2005		
03/05/2005	D9	Acquisition of Sequoia Voting Systems, Inc. (“Sequoia”) by Smartmatic International Corp. (“Smartmatic”) from De La Rue, Inc.
2006		
12/15/2006	T2, D12	Sale and Security Agreement between the Shareholders, Smartmatic, Sequoia and CFIUS
2007		
02/07/2007	D15	Engagement Agreement between Smartmatic and Eureka Capital Markets, LLC
04/27/2007	D22	Agreement between Sequoia and Dominion Voting Systems Corp. regarding pursuit of sale of Dominion’s products in the State of New York
09/13/2007	D460, p. 2	SVS Holdings, Inc. (“SVS”) Articles of Incorporation filed in Delaware
09/18/2007	T6, D29	Date of Stock Purchase Agreement for SVS’s purchase of Sequoia’s stock from Smartmatic

DATE	EXH. #	DESCRIPTION
09/19/2007	D30, D68	U.S. Citizen Management Team Buy Out (MBO) of Sequoia Voting Systems, Inc. presentation to CFIUS
11/05/2007	T6, T7, D29	Closing of Stock Purchase Agreement; numerous agreements executed, including \$2,000,000 Unsecured Promissory Note by SVS
2008		
01/14/2008	T12	Anton Collins Mitchell (“ACM”) Agreement to Provide Auditing Services
01/18/2008	D48	State of New York Executive Department Office of General Services award of Contract No. PC63813 to Sequoia and others
02/15/2008	T17, D54	Letter from J. Bialos re: Notice of Sale to Hart InterCivic
02/19/2008	T19, D56	Letter from J. Blaine to A. Mugica and G. Burt re: Notice of Sale
02/28/2008	T23	Verified Complaint, <i>Smartmatic Corporation v. SVS Holdings, Inc. and Sequoia Voting Systems, Inc.</i> , Delaware Chancery Court
02/28/2008	D64	Motion to Expedite Proceedings, <i>Smartmatic Corporation v. SVS Holdings, Inc. and Sequoia Voting Systems, Inc.</i> , Delaware Chancery Court
03/4/2008	T27	Response to Motion to Expedite Proceedings, <i>Smartmatic Corporation v. SVS Holdings, Inc. and Sequoia Voting Systems, Inc.</i> , Delaware Chancery Court

03/07/2008	T28, D460, p. 84	SVS Board Meeting Minutes re Hart offer and Change in Control Severance Agreements
03/10/2008	T29, D67	Defendants SVS and Sequoia's Answer, Counterclaim and Third-Party Complaint, <i>Smartmatic Corporation v. SVS Holdings, Inc. and Sequoia Voting Systems, Inc.</i> , Delaware Chancery Court
03/13/2008	T31	Change of Control Severance Agreements
03/17/2008	T324	Ruling on Motion for Partial Summary Judgment - Delaware Chancery Court Hearing Transcript
04/04/2008	T325	Letter Opinion - Delaware Chancery Court
04/15/2008	T42	Verified Complaint, <i>Smartmatic Corporation v. SVS Holdings, Inc. and Sequoia Voting Systems, Inc.</i> , Delaware Chancery Court
04/15/2008	D460, p. 113	[Draft] SVS Board Meeting Minutes re sending match letter to Smartmatic for Hart offer ¹
04/15/2008	D75	Letter from Blaine to Mugica re Exercise of Right of First Refusal
04/25/2008	T44	Letter from J. Bialos to R. Bodansky, re: Notice of Match
04/25/2008	T45, D77	\$2,000,000 Revolving Line Note between Sequoia and Phoenix Graphics, Inc.
04/28/2008	D460, p.	SVS Board Meeting Minutes re update on financing for match to Hart offer

¹ Dominion points out that Mr. Blaine testified (Hear. Tr. July 14 2016 at 72:3-22) that these minutes are the minutes of the April 15, 2008 meeting of the SVS Holdings Board. The Trustee does not so stipulate.

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05/22/2008	T48, D460, p. 132	Unanimous Written Consent of Board of Directors of SVS re Blaine Loan Nos. 1-4
05/28/2008	T52, D85	Note Purchase Agreement between Smartmatic and SVS
05/30/2008	T54, D86	\$1,000,000 Promissory Note between J. Girsky and Sequoia
06/23/2008	T56, D90	Settlement Agreement between Smartmatic Services Corporation and SVS
07/08/2008	T62, D460, p. 137	SVS Board Meeting Minutes re Blaine Loan Nos. 1-4
2009		
03/02/2009	T70, D40	ACM Auditor's Report for Sequoia's 2007 Financial Statements
04/28/2009	T71	ACM Audit Wrap Up Report for 2007 Financials
06/15/2009	T91.	Letter of Intent from Hart InterCivic to Sequoia
07/15/2009	D163	Asset Purchase Agreement between Dominion Voting Systems Corporation and Sequoia regarding State of NY Contract
08/26/2009	T117	\$300,000 Promissory Note re Blaine Loan No. 5

10/01/2009	D185	Asset Purchase Agreement Between Sequoia and ProDocumentSolutions, Inc.
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10/23/2009	T125, D192	Agreement Regarding Outstanding Loan Obligations between SVS and Jack Blaine
11/24/2009	T129, D195	\$250,000 Promissory Note re Blaine Loan No. 6
12/2/2009	D196	2007 Federal Consolidated Corporation Tax Return for SVS and Subsidiary
2010		
01/14/2010	T139	Email Transmission of Promissory Notes and Security Agreements re Blaine Loan Nos. 2 and 4
01/18/2010	T146, D106	ACM Auditor's Report for Sequoia's 2007 and 2008 Financial Statements
01/18/2010	T147, D214	Sequoia Management Representation Letter to ACM
01/22/2010	T156	\$303,000 Promissory Note re Blaine Loan No. 7
02/09/2010	T169, D223	Transmittal of Letter of Intent by CAG Acquisitions, Inc. to Sequoia
02/11/2010	T183	Transmittal of proposed "SVS DVS share purchase terms"
03/11/2010	T224, D254	Addendum to ACM Agreement to Provide Audit Services
03/22/2010	T237	ACM Audit Wrap Up Report for 2007 and 2008 Financials
03/25/2010	T241	Signed Letter of Intent re Asset Purchase Transaction between Dominion Voting Systems, Inc. (collectively with Dominion Voting Systems Corp., "Dominion"), and Sequoia
04/09/2010	T245	Smartmatic Complaint against SVS in Delaware Chancery Court re NPA

04/28/2010	D283	Smartmatic Demand for Arbitration against SVS re \$3 Million Payment Under NPA
04/29/2010	D289	SVS Answer and Affirmative Defenses, <i>Smartmatic Corporation v. SVS Holdings, Inc.</i> , Del. Ch. Ct. No. 5400-VCL
06/04/2010	D314	Asset Purchase Agreement between Dominion Voting Systems, Inc., and Sequoia
06/08/2010	T277, D320	SVS Chapter 11 Bankruptcy Petition, Case No. 10-24238
08/04/2010	D109	2008 Federal Consolidated Corporation Tax Return for SVS Holdings, Inc. and Subsidiary
2011		
03/09/2011	D360	2009 Federal Consolidated Corporation Tax Return for SVS Holdings, Inc. and Subsidiary
09/15/2011	D348	2010 Federal Consolidated Corporation Tax Return for SVS Holdings, Inc. and Subsidiary
2012		
10/17/2012	D389	Notice of Appointment of Tom Connolly as Interim Trustee for SVS
11/09/2012	D392	Smartmatic USA Corporation Proof of Claim against SVS
12/07/2012	Dkt #1	Trustee's Complaint against Dominion, Adv. Pro. No. 12-1757-HRT
2013		
02/20/2013	D397	Trustee's Motion for Approval of Settlement Agreement with Jack Blaine, Case No. 10-24238-HRT
12/04/2013	Dkt #54	Trustee's Amended Complaint against Dominion and Sequoia, Adv. Pro. No. 12-1757-HRT

2014		
01/06/2014	Dkt #61	Sequoia's Answer and Joinder in Amended Complaint, Adv. Pro. No. 12-1757-HRT
02/11/2014	T304, D402	Sequoia Chapter 11 Bankruptcy Petition, Case No. 14-11360
05/29/2014	D414, D415, D416	Smartmatic Services Corporation, Smartmatic USA Corporation and Smartmatic International Corporation Proofs of Claim against Sequoia