

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)	Chapter 11
)	
COMPLETE HYDRAULIC SERVICE)	CASE NO. 13-04677-JKC-11
& SALES, INC.,)	
)	
Debtor.)	

MOTION TO SHORTEN NOTICE PERIOD
AND REQUEST FOR EXPEDITED HEARING

Complete Hydraulic Service & Sales, Inc. ("CHSSI"), by counsel, hereby moves for an expedited hearing on its *Emergency Motion for Authority to: (A) Maintain Certain Existing Bank Accounts; (B) Continue Using Its Existing Cash Management System; and (C) Continue Using Its Existing Business Forms* (the "Emergency Motion"). By way of its Emergency Motion, CHSSI respectfully advises the court as follows:

1. Contemporaneously herewith, CHSSI has filed its *Emergency Motion for Authority to: (A) Maintain Certain Existing Bank Accounts; (B) Continue Using Its Existing Cash Management System; and (C) Continue Using Its Existing Business Forms*.

2. On May 2, 2013 (the "Petition Date"), CHSSI filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. CHSSI continues to operate its business and manage its properties as a debtor-in-possession under section 1107(a) and 1108 of the Bankruptcy Code.

3. An emergency exists because CHSSI has a checking account at KeyBank ("KeyBank") for automatic credit card deposits and for its primary operating account ("Pre-Petition Account"). KeyBank owns and operates an equipment distributor and service center, and in order to continue accepting and processing credit cards for purchases of equipment and/or services, it is necessary to continue to utilize its Pre-Petition Account.

4. The Emergency Motion has been served upon the United States Trustee, all interveners and counsel of record, secured creditors, and the 20 largest unsecured creditors by facsimile transmission, e-mail transmission, or overnight delivery, on or about May 10, 2013.

WHEREFORE, CHSSI requests that the court shorten the notice period on the Emergency Motion, that an expedited hearing be set, and for any and all other relief just and proper in the premises.

Respectfully submitted,

TUCKER HESTER BAKER & KREBS, LLC

By: /s/ David R. Krebs
David R. Krebs
Tucker Hester Baker & Krebs, LLC
One Indiana Square, Suite 1600
Indianapolis, IN 46204
Tel: (317) 833-3030
Fax: (317) 833-3031
Email: dkrebs@thbklaw.com

Proposed Attorneys for Debtor