

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 Pay Pre-Petition Employee Wages and Related Obligations nunc pro tunc to Petition Date* (the "Emergency Employee 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 Pay Pre-Petition Employee Wages and Related Obligations nunc pro tunc to Petition Date*.

1. 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 it is necessary and essential that the CHSSI pay and reimburse its employees on a regular basis so as to retain their loyalty and service to the CHSSI.

5. The Emergency Employee 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 Employee 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*