

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 Entry of Interim Order (i) Authorizing Debtor to Use Cash Collateral Pursuant to 11 U.S.C. §363, and (ii) Granting Adequate Protection to Pre-Petition Secured Lender Pursuant to 11 U.S.C. §361, Nunc Pro Tunc to Petition Date* (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 Entry of Interim Order (i) Authorizing Debtor to Use Cash Collateral Pursuant to 11 U.S.C. §363, and (ii) Granting Adequate Protection to Pre-Petition Secured Lender Pursuant to 11 U.S.C. §361, Nunc Pro Tunc to Petition Date*.

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 an immediate need to use cash collateral which is the subject of the liens in favor of the Lender, in order to permit, among other things, the orderly continuation of the operation of the CHSSI's business, to pay

employees, to maintain business relationships with vendors and suppliers and to satisfy other working capital needs. Use of cash collateral is necessary to prevent the immediate and irreparable harm to the Debtor and its estate that would otherwise result if CHSSI is prevented from obtaining use of cash collateral for the foregoing purposes.

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*