

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 Order under 11 U.S.C. §366(A) Prohibiting Utilities from Altering, Refusing or Discontinuing Services, and (B) Determining Adequate Assurances of Payment for Future Services* (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 Order under 11 U.S.C. §366(A) Prohibiting Utilities from Altering, Refusing or Discontinuing Services, and (B) Determining Adequate Assurances of Payment for Future Services*.

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 The Debtor's business activities and services require extensive use of water, gas and electricity for the bathroom and laundry facilities for the hotel operation as well as for the day to day operations of the restaurant and bar. In addition, the Debtor's business activities and services also require use of computers and other equipment to meet the needs of its guests. Accordingly, the Debtor's operations are

highly dependent on continued utility services. An interruption of utility service would severely disrupt the Debtor's business operations.

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

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