

EXHIBIT A

[Proposed] Stipulation and Agreed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:)	Chapter 11
)	
ACR MANAGEMENT, L.L.C., <u>et al.</u> ¹ ,)	Case No. 04-27848-MBM
)	(Jointly Administered)
Debtors.)	
)	DOCKET NO:
)	
TIMOTHY J. KOENIG,)	Related Docket Nos.: 1004
)	
Movant,)	Hearing Date and Time: March 7, 2005,
)	at 2:30 p.m. (EST)
v.)	
)	Objection Deadline: n/a
)	
ACR MANAGEMENT, L.L.C., <u>et al.</u> ,)	
)	
Respondents.)	

**STIPULATION AND AGREED ORDER OF COURT
RESOLVING [CM/ECF#1004] MOTION OF TIMOTHY J. KOENIG TO
EXTEND TIME TO FILE PROOF OF CLAIM AND AUTHORIZATION TO
FILE PROOF OF CLAIM AFTER THE BAR DATE**

WHEREAS, on June 14, 2004 (the "Petition Date"), each of the above-captioned debtors and debtors-in-possession (the "Debtors") filed voluntary petitions for relief (these "Chapter 11 Cases") pursuant to Chapter 11 of Title 11 of the United States Code, §§101, et seq., with the United States Bankruptcy Court for the Western District of Pennsylvania;

WHEREAS, on December 30, 2004, this Court entered an Order confirming the Debtors' proposed plan of reorganization (the "Plan"²) and such Plan became effective pursuant to its terms on January 28, 2005;

WHEREAS, as of the Petition Date, Timothy J. Koenig ("Koenig," together with the Debtors, the "Parties") was a judgment creditor against the Debtors in the 16th Judicial Circuit in and for Monroe County, Florida, Case No. CA-K-01-867 in the approximate amount

¹ The Debtors are the following entities: ACR Management, L.L.C., Anthony Crane Rental Holdings, L.P., ACR/Dunn Acquisition, Inc., Anthony Crane Capital Corporation, Anthony Crane Holdings Capital Corporation, Anthony Crane International, L.P., Anthony Crane Sales & Leasing, L.P., Anthony International Equipment Services Corporation, Anthony Sales & Leasing Corporation, Carlisle Equipment Group, L.P., Carlisle GP, L.L.C., Husky Crane, Inc., Anthony Crane Rental, L.P., d/b/a Maxim Crane Works, Maxim Crane Works, LLC, Sacramento Valley Crane Service, Inc., The Crane & Rigging Company, LLC, Thompson & Rich Crane Service, Inc.

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

\$116,046.88, which judgment was the subject of an appeal pending in the Third District Court of Appeals for the State of Florida;

WHEREAS, the Bankruptcy Court set November 17, 2004, as the bar date (the “Bar Date”) for creditors to file a proof of claim in these cases;

WHEREAS, a dispute exists as to whether Koenig received proper and adequate notice of the Bar Date;

WHEREAS, on December 16, 2004, Koenig filed in these Chapter 11 Cases, a motion for enlargement of time to file proof of claim and authorization to file proof of claim after the Bar Date (the “Enlargement Motion,” CM/ECF#1004);

WHEREAS, on January 18, 2005, the Debtors objected to this Enlargement Motion (the “Objection,” CM/ECF#1157);

WHEREAS, Koenig filed a reply to the Debtors’ Objection and a hearing was held on January 25, 2005, on the Enlargement Motion;

WHEREAS, this Court scheduled an evidentiary hearing to be held on March 7, 2005, at 2:30 p.m. with regarding to this matter;

NOW, THEREFORE, in resolution of all disputes between the Parties, it is hereby stipulated and agreed by and between the Parties, through their respective undersigned counsel, that:

- i. Koenig is granted an Allowed Claim in these Chapter 11 Cases in the amount of \$58,023.44, which shall be treated as a Class 7 general unsecured claim.
- ii. Any and all other claims filed in these Chapter 11 Cases by Koenig shall be disallowed in their entirety.

STIPULATED AND AGREED TO BY:

Dated: February 28, 2005

/s/ Peter Pross
Peter Pross (Pa. Id. #36890)
ECKERT SEAMANS CHERIN MELLOTT, LLC
U.S. Steel Tower
600 Grant Street, 44th Floor
Pittsburgh, PA 15219-2788

Counsel for Timothy J. Koenig

[SIGNATURES CONTINUED ON NEXT PAGE]

Dated: February 28, 2005

/s/ Salene R. Mazur
Salene R. Mazur (Pa. Id. #86422)
CAMPBELL & LEVINE, LLC
1700 Grant Building
Pittsburgh, PA 15219-2399

Counsel for the Debtors

It is so Ordered this _____ day of _____, 2005.

BY THE COURT:

M. BRUCE McCULLOUGH
U.S. Bankruptcy Judge