

EXHIBIT A

[PROPOSED] STIPULATION AND AGREED ORDER

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

In re:)	
)	
ACR MANAGEMENT, L.L.C., ET AL., ¹)	Case No. 04-27848-MBM
Debtors.)	Chapter 11
)	(Jointly Administered)
)	
ACR MANAGEMENT, L.L.C., ET AL.,)	Docket No.: _____
Movants,)	
)	Related Docket No.: 1008
v.)	
)	Objection Deadline:
INTRASTATE CONSTRUCTION CORP.,)	Hearing Date:
Respondent.)	
)	

**STIPULATION AND AGREED ORDER OF COURT
RESOLVING MOTION [CM/ECF#1008] FILED BY INTRASTATE CONSTRUCTION
CORP. TO CONSIDER PROOF OF CLAIM AS TIMELY-FILED**

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, on the Debtors' Schedules filed in these Chapter 11 Cases, the Debtors listed Intrastate Construction Corp. ("Intrastate," together with the Debtors, the "Parties") as an unsecured creditor with a claim in an unknown amount;

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 Chapter 11 Cases;

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.

WHEREAS, on December 17, 2004, Michael E. Stearns, Esquire, filed an unsecured, non-priority proof of claim on behalf of Intrastate in the amount of \$133,594.03 for an alleged breach of contract for non-performance, which was assigned Claim No. 936 (the "Claim");

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

WHEREAS, on December 17, 2004, Intrastate filed a motion for consideration of its Claim as timely-filed (the "Enlargement Motion," CM/ECF#1008);

WHEREAS, on January 18, 2005, the Debtors objected to this Enlargement Motion (the "Objection," CM/ECF#1158), 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 10, 2005, at 2:30 p.m. with regard 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. Intrastate is granted an Allowed Claim in these Chapter 11 Cases in the amount of \$50,000, which shall be treated as a Class 7 general unsecured claim.
- ii. Any and all other claims filed in these Chapter 11 Cases by Intrastate shall be disallowed in their entirety.

STIPULATED AND AGREED TO BY:

Dated: March 2, 2005

/s/ Kimberly A. Coleman
Kimberly A. Coleman, Esq.
LEECH TISHMAN FUSCALDO & LAMPL, LLC
Citizens Bank Building, 30th Floor
525 William Penn Place
Pittsburgh, PA 15219
Phone: (412) 261-1600
Fax: (412) 227-5551

Counsel for Intrastate Construction Corp.

-and-

Dated: March 2, 2005

/s/ Salene R. Mazur
Salene R. Mazur (Pa. Id. #86422)
CAMPBELL & LEVINE, LLC
1700 Grant Building
Pittsburgh, PA 15219-2399
Phone: (412) 261-0310, ext. 120
Fax: (412)-261-5066

Counsel for the Debtors

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

BY THE COURT:

M. BRUCE McCULLOUGH
U.S. Bankruptcy Judge