

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

Chapter 11

IN RE:

ACR MANAGEMENT, L.L.C., et al.,

Debtors.

Jointly Administered at:
Case No. 04-27848-MBM

Document No. _____

Related to Doc. No. 1317

Hearing Date & Time: 5/31/05, 3:00
Objection Deadline: 5/24/05

MOTION FOR CONTINUANCE OF HEARING DATE
AND RESPONSE DEADLINE

AND NOW, comes the Movant, Albert C. Bove, by and through his counsel, Paul R. Yagelski and the law firm of Rothman Gordon, P.C., and files this Motion For Continuance Of Hearing Date And Response Deadline, setting forth as follows:

1. The Movant, Albert C. Bove, has filed a Request For Approval And Payment Of Administrative Expense ("Request"), Document No. 1317.
2. On March 17, 2005, this Court entered an Order granting a continuance on the aforesaid Request and setting a new hearing date of May 31, 2005 and response date of May 24, 2005. A true and correct copy of said Order is attached hereto.
3. Currently, the Movant and the Debtor have entered into a Settlement Agreement. The parties are simply awaiting full execution of the Settlement Agreement. Once the Movant receives the signed Settlement

Agreement, the Movant will withdraw his Application For Administrative Expenses.

4. In view of the Settlement Agreement, the Movant requests a thirty (30) day continuance of the hearing that has been scheduled, and the response deadline that has been set, on the Movant's Request.

5. The Debtor through its counsel has consented to this Motion for a continuance.

WHEREFORE, the Movant respectfully requests that the hearing date and response deadline that have been set on his Request For Approval And Payment Of Administrative Expense be continued for a period of thirty (30) days.

ROTHMAN GORDON, P.C.

/s/ Paul R. Yagelski

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