

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

)	
In re:)	
)	Case No. 04-0_____(____)
ACR MANAGEMENT, L.L.C., <u>et al.</u> , ¹)	
)	Chapter 11
)	
Debtors.)	(Jointly Administered)
)	
)	Docket No. ____
ACR MANAGEMENT, L.L.C., et al.,)	
)	Hearing Date and Time: _____
Movants,)	
)	Objection Deadline: _____
v.)	
)	
NO RESPONDENT.)	
)	

**EMERGENCY EX PARTE MOTION FOR DESIGNATION
AS COMPLEX CHAPTER 11 BANKRUPTCY CASES**

The above-captioned bankruptcy cases were filed on June 14, 2004. The Debtors believe that these cases qualify as Complex Chapter 11 Bankruptcy Cases pursuant to the Local Rules because:

1. There is need for emergency consideration of the following "First Day" Motions:

Each of the motions listed in the [Proposed] Agenda of First Day Motions, attached hereto as Exhibit A, as going forward, which are items 2-20 thereon.

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. As of December 31, 2003, the Debtors had total debt of more than \$795.3 million.
3. There are more than 10,000 parties-in-interest in this case.

Notice

No trustee, examiner or creditors' committee has been appointed in the Chapter 11 Cases. Notice of this Motion has been provided to: (a) the United States Trustee; (b) those parties listed on the Consolidated List of Creditors Holding Largest Twenty Unsecured Claims Against The Debtors, as identified in their chapter 11 petitions; (c) counsel to the Agent for the DIP Lenders; (d) counsel to the Agent for the Prepetition Senior Lenders; (e) counsel to the Term B Lenders; (f) counsel to the Term C Lender; (g) the Indenture Trustee for the New Senior Notes; and (h) the Indenture Trustee for the New Debentures. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is required.

WHEREFORE, the Debtors respectfully request entry of an order designating the above-captioned chapter 11 cases as Complex Chapter 11 Bankruptcy Cases and such other relief as is just and proper under the circumstances.

Dated: Pittsburgh, Pennsylvania
June 14, 2004

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-and-

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[Proposed] Co-Counsel for the Debtors and Debtors in Possession