

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF KANSAS**

In re:)	In Proceedings Under Chapter 11
)	
GATEWAY ETHANOL, L.L.C.)	Case No. 08-22579-DLS
)	
Debtor.)	

**MOTION FOR EXPEDITED HEARING ON CERTAIN
MOTIONS AND APPLICATIONS FILED BY DEBTOR**

COMES NOW Gateway Ethanol, L.L.C., as debtor and debtor in possession (“Debtor”), and submits its Motion for Expedited Hearing on Certain Motions and Applications Filed by Debtor (the “Motion”). In support of this Motion, Debtor respectfully represents as follows:

1. On even date with the filing of this Motion (the “Petition Date”), the Debtor filed a voluntary petition in this Court for reorganization relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532, as amended (the “Bankruptcy Code”). The Debtor continues to operate its business and manage its properties as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed, and no official committee of creditors or equity interest holders has yet been established.

3. The relief requested in each of the Motions and Applications enumerated on **Exhibit A** attached hereto is necessary to avoid immediate and irreparable harm to Debtor’s ability to reorganize. It is essential to Debtor’s reorganization efforts that Debtor be accorded the relief requested in each of the Motions and Applications. Accordingly, Debtor requests a hearing on each of the Motions and Applications on an expedited basis.

WHEREFORE, Debtor respectfully requests that the Court enter an Order setting an expedited hearing on each of the Motions and Applications enumerated on Exhibit A attached hereto and for such other and further relief as is just and proper.

Respectfully submitted,

BRYAN CAVE LLP

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EXHIBIT A

FIRST DAY MOTIONS AND APPLICATIONS

1. Application for Order Authorizing Retention and Employment of Bryan Cave LLP as Counsel for Gateway Ethanol, L.L.C., Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014
2. Emergency Motion for Order Authorizing Maintenance of Cash Management System and Continued Use of Certain Existing Bank Accounts, Investment and Deposit Practices and Certain Business Forms
3. Emergency Motion for Order Authorizing Payment of Pre-Petition Wages, Salaries, Reimbursable Employee Expenses and Medical and Other Employee Benefits
4. Emergency Motion for Order Approving Debtor's Method of Furnishing Adequate Assurance of Payment for Postpetition Utility Services
5. Motion for Order Under 11 U.S.C. §§ 105(a) and 541 Confirming Authority and/or Authorizing Debtor to Pay Various Federal, State and Local Taxes
6. Motion for Authority to Perform Obligations Necessary to Maintain Existing Insurance
7. Motion for Extension of Time for Filing Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Statements of Financial Affairs and Statements of Executory Contracts
8. Motion for an Order (A) Authorizing Debtor to Operate Its Business and (B) Implementing the Automatic Stay
9. Motion for Order Authorizing Retention of Professionals Utilized by Debtor in the Ordinary Course of Business
10. Application under 11 U.S.C. § 327 for Retention of William Blair & Company as Investment Banker and Financial Consultant for Debtor and Debtor in Possession
11. Motion to Approve Standing Order No. 1 to Establish Limited Notice and Motion Procedures
12. Motion to Approve Standing Order No. 2 Establishing Procedures for Interim Compensation and Establishing Fee and Expense Guidelines