

**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
EMERGENCY MOTION TO APPROVE STIPULATED ORDER
GRANTING EXPEDITED RELIEF AND INTERIM ORDER (I) AUTHORIZING
DEBTOR (A) TO OBTAIN SECURED POSTPETITION FINANCING PURSUANT TO 11
U.S.C. §§ 105, 361, 363, AND 364(c) AND (d); AND (B) TO GRANT SECURITY
INTERESTS, SUPERPRIORITY CLAIMS AND ADEQUATE PROTECTION; AND (II)
SCHEDULING A FINAL HEARING
PURSUANT TO BANKRUPTCY RULE 4001(c)**

COMES NOW Gateway Ethanol, L.L.C., as debtor and debtor in possession (“Debtor”), and submits its Motion for Expedited Hearing on Emergency Motion to Approve Stipulated Order Granting Expedited Relief and Interim Order (I) Authorizing Debtor (A) to Obtain Secured Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 363, and 364(c) and (d); and (B) to Grant Security Interests, Superpriority Claims and Adequate Protection; and (II) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c) (the “Financing Motion”). In support of this motion, Debtor respectfully represents as follows:

1. On October 5, 2008 (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 the Financing Motion 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 the Financing Motion. Accordingly, Debtor requests a hearing on the Financing Motion on an expedited basis, to be heard along with all the motions filed on the Petition Date, on Tuesday, October 7, 2008 at 2:00 p.m.

WHEREFORE, Debtor respectfully requests that the Court enter an Order setting an expedited hearing on the Financing Motion for Tuesday, October 7, 2008 at 2:00 p.m., and for such other and further relief as is just and proper.

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ Laurence M. Frazen

Laurence M. Frazen KS Fed. #70114
Tammee E. McVey KS #14972
BRYAN CAVE LLP
3500 One Kansas City Place
1200 Main Street
Kansas City, Missouri 64105
Telephone: (816) 374-3200
Facsimile: (816) 374-3300

Attorneys for Debtor and Debtor in Possession