UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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IN RE:	)	
	)	
Kiel Bros. Oil Co., Inc. and	)	**Case No. 04-11121BHL11**
KP OIL, Inc.,	)	**Jointly Administered**
Debtors.	)	

MOTION TO SHORTEN AND LIMIT NOTICE ON STOP 3 TRUCK PLAZA, INC.'S AMENDED APPLICATION FOR ADEQUATE PROTECTION PAYMENTS PURSUANT TO 11 U.S.C. §363 AND/OR MOTION TO LIFT AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362

Comes now Stop 3 Truck Plaza, Inc., by and through the undersigned counsel, Eric N. Allen and Jonathan M. Brown, respectfully request that this Court shorten and limit notice of the Amended Application for Adequate Protection Payments pursuant to 11 U.S.C. §363 and/or Motion to Lift Stay pursuant to 11 U.S.C. §362 filed by the Debtors on August 30, 2004. In support of the Motion, Stop 3 Truck Plaza, Inc. represents as follows:

1. The Debtors filed their petitions under Chapter 11 of the U.S. Bankruptcy Code, 11 U.S.C. §§ 101 *et. seq.* (the "Bankruptcy Code") on or about June 15, 2004 (the "Petition Date"), and are presently operating as a debtor-in-possession case in accordance with §1107 and §1108 of the Bankruptcy Code;
2. A hearing is scheduled on Stop 3 Truck Plaza, Inc.'s Application for Adequate Protection for September 8, 2004;
3. An emergency exists which justifies the shortening and limitation of notice to only those parties set forth in the Certificate of Service below in order that the Motion may be heard at the next hearing scheduled September 8, 2004 in that The Debtors

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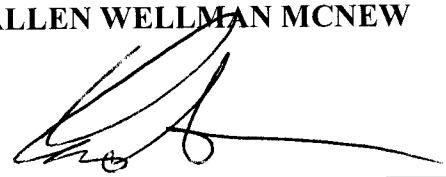
continue to operate their business on the real estate without making any payments to Stop 3 for the use of that property. Further, it has been indicated by counsel for the Debtor that they will likely be abandoning the property in this case;

4. Stop 3 Truck Plaza, Inc. will cause the Motion and Notice of Hearing to be served by expedited delivery to each of the parties identified below on August 30, 2004;

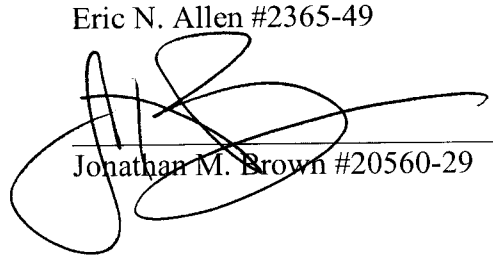
WHEREFORE, Stop 3 Truck Plaza, Inc. request that the Court limit notice of the Motion to the United States Trustee, counsel for the Official Committee of Unsecured Creditors, counsel for the Debtor, counsel for the banks, and all counsel and intervenors of record and shorten notice as described herein.

Respectfully Submitted,

ALLEN WELLMAN MCNEW



Eric N. Allen #2365-49



Jonathan M. Brown #20560-29

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following by regular U.S. Mail, postage prepaid, this 30th day of August, 2004:

U.S. Trustee
101 West Ohio, Suite 2700
Indianapolis, Indiana 46204

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Unsecured Creditor's Committee Co-Chair
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Bill Kaye
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East Rockaway, NY 11518

Unsecured Creditor's Committee Co-Chair
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Neal Mayes
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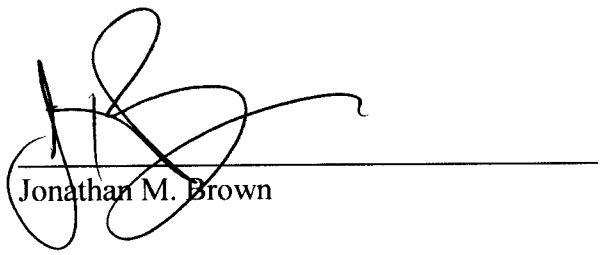

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