

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:	)	
	)	Chapter 11
<b>ORECK CORPORATION, et al</b>	)	Case No. 13-04006
	)	Judge Lundin
565 Marriott Dr., Suite 300	)	
Nashville, TN 37214	)	(Jointly Administered)
Debtors.	)	

**MOTION FOR EXPEDITED HEARING ON MOTION TO  
APPROVE DIP FINANCING WITH  
BLACK DIAMOND COMMERCIAL FINANCE, L.L.C.**

Pursuant to Local Rule 9075-1, the Debtors do hereby request as follows:

1. Relief Requested. The Debtors request the Court set an expedited hearing on the Motion to Approve DIP Financing with Black Diamond Commercial Finance, L.L.C., acting as administrative agent for itself and the lenders that are party from time to time thereto with such DIP facility (the "Motion") and that the court set the hearing on or before Friday, May 17, 2013.

2. Need for Expedited Hearing. The Debtors are in urgent need of an expedited hearing on the Motion. At the hearing on the first day motions on May 8, 2013, the Court denied the Debtors' Motion for DIP financing. Following the hearing, the Debtors have only been able to make payroll expenditures through the use of cash collateral. The Debtors have been unable to purchase any inventory and are essentially out of inventory. Such inventory is critical to continue producing vacuum cleaners and related products to continue the business operations of the Debtors. Moreover, the Debtors have been unable to pay any other postpetition operating expenses. This DIP funding is critical to the continue operations of the Debtors until the proposed § 363 sale and are needed as soon as possible. An expedited hearing on the Motion is

essential to maintain the Debtors' going concern value, and without an expedited hearing on the Motion, the Debtors' value to potential buyers will surely decline.

3. Notice. Notice of this Motion will be served by BMC Group on May 17, 2013 pursuant to the Master Service List approved by the Court on May 8, 2013.

4. Request Hearing Date. Debtors request this Court schedule an expedited hearing on these motions at an available time for the Court on Monday, May 20, 2013, and if none, to be heard on Tuesday, May 21, 2013.

Respectfully Submitted,

/s/ William L. Norton III.

William L. Norton III  
Alexandra E. Dugan  
Bradley Arant Boult Cummings LLP  
1600 Division St., Suite 700  
Nashville, TN 37203  
615-252-2397  
bnorton@babbc.com  
adugan@babbc.com

*Attorneys for Debtor*