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

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

MOTION FOR EXPEDITED HEARING ON USE OF CASH COLLATERAL

Pursuant to Local Rule 9075-1, the Debtors do hereby request an expedited hearing on the use of cash collateral. In support of this motion, the Debtors state as follows:

- 1. <u>Relief Requested</u>. The Debtors request the Court schedule an expedited hearing on the entry of the attached Agreed Order Pursuant to §§ 361 and 363 of the Bankruptcy Code (I) Authorizing the Debtors' Use of Cash Collateral on an Interim Basis and Granting Adequate Protection and (II) Granting Related Relief (the "<u>Agreed Order</u>").
- 2. <u>Need for Expedited Hearing</u>. The above nine cases were filed on Monday, May 6, 2013. At the first day hearing on May 8, 2013, the Debtors' proposed DIP loan was denied. An expedited hearing on the Agreed Order is needed in order for the Debtors to meet their payroll obligations until a revised DIP financing agreement can be proposed.
- 3. <u>Notice.</u> Notice of this Motion will be served pursuant to the Master Service List approved by the Court on May 8, 2013.
- 4. <u>Requested Hearing Date</u>. Debtors request this Court schedule an expedited hearing on these motions on or before Tuesday, May 14, 2013.

Respectfully Submitted,

/s/ William L. Norton III.

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