

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

IN RE: § Chapter 11  
§  
ORECK CORPORATION, *et al.*, § Case No. 13-04006  
§ (Jointly Administered)  
§  
Debtors. § Judge Lundin

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**EXPEDITED MOTION FOR BRUCE R. KRAUS  
TO APPEAR TELEPHONICALLY AT SALE APPROVAL HEARING**

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1. Pursuant to Rule 9075-1 of the Local Rules of Bankruptcy Procedure, Royal Appliance Manufacturing Company and Hoover Inc. (collectively, the “Parties”), wholly-owned subsidiaries of Techtronic Industries Co. Ltd., move for entry of the proposed order submitted herewith (the “Order”) so that primary counsel, Bruce Kraus of the firm of Kelley Drye & Warren LLP (“Kelley Drye”), may appear telephonically at the hearings scheduled for 9:00 AM on Tuesday, July 16, 2013 (the “Hearings”).

2. Expedited relief is necessary because routine notice and motion procedures would not provide adequate timely relief since the Hearings are scheduled for tomorrow. As a result, expedited consideration of this motion and order are required.

3. Notice of this motion will be given to all parties receiving electronic notice through the Court’s CM/ECF system, which includes the United States Trustee. The Parties submit that service of the Order, if entered, is sufficient if given through the Court’s CM/ECF system.

4. The Parties request that the motion and Order be entered immediately. The Parties submit that no further or other notice is required and no hearing on the motion is

necessary because the relief is not controversial and is administrative in nature.

5. The Parties wish to have their counsel of record, Bruce Kraus, who has previously been admitted *pro hac vice*, appear at the hearing in order to protect their interests. Local counsel, as well as Gilbert Saydah and Benjamin Feder of Kelley Drye (whose admissions *pro hac vice* have also been granted), will also attend the Hearings. Royal Appliance Manufacturing Company was the successful bidder for the assets of the Debtors and believe that Mr. Kraus can adequately address any material related to the Hearings via telephone.

WHEREFORE, the Parties pray this Court grant the requested relief, enter the Order, and for such other and further relief as is just and equitable.

Dated: July 15, 2013

RESPECTFULLY SUBMITTED:

*/s/ Robert J. Welhoelter*

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and Hoover Inc.

*\*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via the Court's CM/ECF system on this the 15th day of July, 2013.

*/s/ Robert J. Welhoelter*