

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Case No. 06-51848
)	Jointly Administered
CEP Holdings, LLC, et al.,)	
)	Chapter 11
Debtors)	
)	Judge Marilyn Shea-Stonum

**MOTION FOR EXPEDITED HEARING ON EMERGENCY MOTION FOR RELIEF
FROM STAY**

Ford Motor Company ("Ford"), a party in interest, by and through its undersigned counsel, hereby requests an expedited emergency hearing and shortening of notice of hearing and time to object ("Expedited Hearing Motion"), and that the Court, pursuant to Section 105 of Title 11 ("Bankruptcy Code") of the United States Code, grant an expedited hearing on Ford's Emergency Motion¹ at the Court's earliest convenience so that Ford may seek relief from the automatic stay authorizing Ford to exercise its

¹ All capitalized terms not defined herein, shall have the meaning ascribed to them in Ford's Emergency Motion for Relief From Stay.

available state law remedies for recovery of equipment being wrongfully retained by the Debtors at their Canton, Ohio facility. In support of this Expedited Hearing Motion, Ford respectfully states the following.

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper under 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is Section 105 of the Bankruptcy Code.

2. Debtor Creative Engineered Polymer Products, LLC ("CEPP") operates manufacturing operations in several locations, including one located in Canton, Ohio ("Canton Facility"). As more fully explained in the Emergency Motion,² Ford owns certain tools (commonly referred to collectively as the "Blow Mold") that currently sit at the Canton Facility.³ CEPP has utilized Ford's Blow Mold to form and manufacture "Console Heater Ducts" for use by Ford in all of Ford's F-Series vehicles.

3. Upon information and belief, the Canton Facility is one of the "Closing Facilities"⁴ that is being wound down to be sold at auction. CEPP is Ford's only supplier of Console Heater Ducts and Ford has approximately **three weeks** of inventory of Console Heater Ducts remaining.

² All assertions contained in the Emergency Motion are fully incorporated herein.

³ Upon information and belief, CEPP acknowledges that Ford owns the Blow Mold.

⁴ As that term is defined in the Debtor's Motion for Order (A) Granting Authority for the Sale of Assets pursuant to Section 363(b); (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with such Sale and Determining and Adjudicating Cure Amounts with respect to such Contracts and Leases pursuant to Section 365; (C) Establishing Bidding Procedures; (D) Setting Date for Auction and Hearing on Approval of Sale of Assets; and (E) Approving Form of Notice [docket # 103].

4. CEPP is the only supplier for this part. Ford has identified another supplier that is prepared to install the Blow Mold, but it could take longer than **four weeks** from the time the Blow Mold is removed from the Canton Facility and then installed and operational at the new supplier's plant. Without the Console Heater Ducts, assembly lines in Michigan, Missouri and Virginia will be forced to shut down. For this reason, Ford urgently requests that the Court grant its request for an expedited emergency hearing to consider its Emergency Motion and shorten the required notice of hearing period and time to object.

5. By way of this Expedited Hearing Motion, Ford is respectfully requesting that the Court enter an order setting an expedited emergency hearing and shortening the notice period and time to object, so the Court and the parties in interest may consider Ford's Emergency Motion.

6. Ford requests that the Court waive the requirement of Rule 9013-1(a) of the Local Bankruptcy Rules that any motion filed shall have an accompanying memorandum of law. As this Motion does not present a novel issue of law, Ford submits that waiver is appropriate.

7. Due to the critical time considerations and the dire consequences that any delay will produce specifically, the idling of several major Ford assembly lines, and for the reasons set forth in the Emergency Motion, Ford respectfully submits that it is entitled to an expedited emergency hearing to determine the disposition of Ford's Emergency Motion. Given that as little as three weeks worth of Console Heater Duct inventory remains, this situation has become dire, possibly resulting

the shutdown of several major assembly plants and the layoff of thousands of workers.

WHEREFORE, Ford requests that the Court enter an Order (i) granting an expedited hearing on the Emergency Motion at its earliest convenience; (ii) shortening the notice of hearing period; (iii) shortening the time to object to the Emergency Motion; and (iv) such other and further relief to which it may be entitled.

Dated: October 18, 2006

Respectfully submitted,

/s/ Andrew L. Turscak, Jr.

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