

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

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In re: :  
: Case No. 06-51848  
CEP HOLDINGS, LLC, et al.,<sup>1</sup> : (Jointly Administered)  
: :  
Debtors. : Chapter 11  
: :  
: Honorable Marilyn Shea-Stonum  
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**MOTION FOR AN EXPEDITED HEARING ON  
MOTION FOR APPROVAL OF STIPULATED ORDER**

CEP Holdings, LLC and its debtor affiliates, debtors and debtors-in-possession in the above-captioned cases (the “**Debtors**”), hereby file this Motion for an Expedited Hearing (this “**Motion**”) on the Motion for Approval of Stipulated Order (the “**Approval Motion**” filed contemporaneously herewith). In support of this Motion, the Debtors respectfully state as follows:

**BACKGROUND**

1. Concurrently herewith the Debtors filed the Approval Motion requesting that this Court approve and enter the Stipulated Order which is attached thereto as Exhibit A. In the Stipulated Order, the Debtors and the United States Trustee have agreed to an extension to October 27, 2006 of the time within which the Debtors must file schedules and statements of financial affairs. The current deadline is October 20, 2006.

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<sup>1</sup> The Debtors include: CEP Holdings, LLC, Creative Engineered Polymer Products, LLC and Thermoplastics Acquisition, LLC.

**RELIEF REQUESTED**

2. By this Motion, the Debtors request that the Court enter an Order pursuant to Bankruptcy Rule 9006 shortening the time required for notice of the Approval Motion and scheduling an expedited hearing on the Approval Motion or, in the alternative, enter the Stipulated Order based on the consent of the United States Trustee.

**BASIS FOR RELIEF**

3. Bankruptcy Rule 9006 permits the Court to reduce the time period prescribed for notice of certain actions “for cause shown.” The Debtors submit that there is sufficient cause to justify shortening the standard notice period for the relief requested in the Approval Motion.

4. Given the consent of the United States Trustee to the Stipulated Order and given the current deadline of October 20, 2006, the relief requested herein is warranted and in the best interests of the Debtors’ estates.

WHEREFORE, The Debtors respectfully requests that the Court enter an Order substantially in the form of Exhibit A hereto scheduling an expedited hearing on the Approval Motion or, in the alternative, approving the Stipulated Order.

Dated: October 19, 2006  
Cleveland, Ohio

Respectfully submitted,

CEP HOLDINGS, LLC, et. al.,  
Debtors and Debtors-in-possession

By: /s/ Joseph F. Hutchinson, Jr.  
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