

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re:	)	Case No. 06-51848
	)	(Jointly Administered)
CEP HOLDINGS, LLC, <i>et al.</i> ,	)	Chapter 11
	)	
Debtors.	)	Honorable Marilyn Shea-Stonum
	)	United States Bankruptcy Judge
	)	
WASHINGTON PENN PLASTIC COMPANY, INC.,	)	Document No. _____
	)	
Movant,	)	
	)	
V.	)	
	)	
NO RESPONDENT.	)	
	)	

**MOTION FOR EXPEDITED HEARING ON WASHINGTON PENN PLASTIC  
COMPANY, INC.’S MOTION TO APPOINT EXAMINER PURSUANT TO 11  
U.S.C. § 1104(c)(1)**

AND NOW, comes Washington Penn Plastic Company, Inc. (“Washington Penn”), by and through its undersigned counsel, and files the within Motion for Expedited Hearing on Washington Penn Plastic Company, Inc.’s Motion to Appoint Examiner Pursuant to 11 U.S.C. § 1104(c)(1) (the “Motion”) and in support thereof avers as follows:

1. In its Motion, Washington Penn seeks the appointment of an examiner to investigate the facts and circumstances surrounding highly leveraged prepetition transactions that resulted in the creation of the debtor entities.

2. In addition to the highly leveraged transactions, Washington Penn requests that an examiner investigate the facts and circumstances surrounding releases granted in the Final DIP Order, as well as the proposed releases to be granted in a Joint Plan.

3. Washington Penn's Motion is properly heard on an expedited basis in as much as:

- a. Section 1104(c), the statutory basis for Washington Penn's Motion, requires an examiner be appointed prior to plan confirmation;
- b. A Disclosure Statement has been filed and is before this Court for approval; and
- c. Washington Penn believes the examiner's investigation should be concluded prior to Plan confirmation, in as much as the outcome of the investigation could impact the terms of the Plan and/or its acceptance by creditors.

4. The timely appointment of an examiner in this case is imperative to ensure full and fair disclosure prior to the entry of a confirmation order.

WHEREFORE, Washington Penn respectfully requests this Court enter an Order granting its request for an expedited hearing on its Motion to Appoint Examiner Pursuant to 11 U.S.C. § 1104(c)(1).

Respectfully submitted,

LEECH TISHMAN FUSCALDO & LAMPL, LLC

/s/ Richard J. Cromer

Richard J. Cromer

Pa. I.D. #79214

Citizens Bank Building

30th Floor

525 William Penn Place

Pittsburgh, PA 15219

(412) 261-1600