

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
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In re: Chapter 11
Gulfstream Crane, LLC, Case No. 09-37091-RBR
Debtor.

EX PARTE MOTION TO CONTINUE HEARING ON EMERGENCY MOTION FOR CLARIFICATION OF COURT'S RULING ON DEBTOR'S MOTION TO ENFORCE COMPLIANCE WITH DEBTOR'S FIRST AMENDED PLAN OF LIQUIDATION AND CONFIRMATION ORDER

Steve Retterath, Palm Beach Trucking, LLC d/b/a Merchant Transport and Royal Crane, LLC d/b/a Hunter Crane (the "Interested Parties") requests that the Court reschedule the February 24, 2011 hearing on the *Emergency Motion for Clarification of Court's ruling on Debtor's Motion to Enforce Compliance with Debtor's First Amended Plan of Liquidation and Confirmation Order* (the "Motion") [DE #878] as undersigned counsel has a conflict and has to be in Miami for a 341 meeting and hearings starting at 2:30 p.m. In addition, counsel for the Debtor is scheduled for hearing in West Palm Beach at 2:30 p.m. In support of this motion, Interested Parties state as follows:

Relevant Background

1. On February 15, 2011, the Court conducted a preliminary hearing on the Motion.
2. On February 21, 2011, Interested Parties filed the *Emergency Motion for Clarification of Court's Ruling on Debtor's Motion to Enforce Compliance with Debtor's First Amended Plan of Liquidation and Confirmation Order* (the "Motion for Clarification").
3. The Court has scheduled a hearing on the Motion for Clarification for February 24, 2011.

4. Undersigned counsel and counsel for the Debtor are scheduled to be in Bankruptcy Court in Miami and West Palm Beach, respectively, at 2:30 p.m. that day. Undersigned counsel will be attending a meeting of creditors and hearings immediately thereafter and anticipates that the matters will take the entire afternoon.

5. The representative for the Interested Parties that would be able to testify as to the issues subject of the Motion for Clarification is not available on February 25, 28 or March 1. However, undersigned counsel and representative of Interested Parties is available March 2, 3 or 4, 2011.

6. I hereby certify that I contacted counsel for the Debtor, Bank Midwest and Allegiance regarding the relief sought herein. Counsel for the Debtor indicated that he also had a conflict on February 24, 2011. I have not received a response from counsel for Bank Midwest or Allegiance regarding the requested continuance.

WHEREFORE, the Interested Parties respectfully request that the Court grant this motion, reschedule the February 24, 2011 hearing to either March 2, 3, or 4, 2011 and grant such other and further relief as the Court deems just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on February 23, 2011 upon those parties receiving notices of electronic filing.

Respectfully Submitted,

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By: /s/ Grace E. Robson
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