

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

In re)	
)	
FREEDOM INDUSTRIES, INC.)	Chapter 11
)	
Debtor.)	Case No. 2:14-bk-20017
)	

**MOTION FOR AN EXPEDITED HEARING ON THE DEBTOR'S MOTION TO
AUTHORIZE THE RETENTION OF EXPERTS WITHOUT FURTHER ORDER
OF COURT AND PAYMENT OF CERTAIN PREPETITION OBLIGATIONS
PURSUANT TO DEBTOR'S INSURANCE POLICIES**

The debtor and debtor-in-possession ("Freedom" or the "Debtor") in the above-captioned case has simultaneously filed the *Motion to Authorize the Retention of Experts Without Further Order of Court and Payment of Certain Obligations Pursuant to Debtor's Insurance Policies* (the "Motion").¹ The Debtor respectfully requests that the Court consider the Motion on an expedited basis. In support of this request, the Debtor states as follows:

1. Pursuant to Local Rule 9013-1(f), the Debtor requests expedited consideration of the Motion by the Court.
2. Expedited relief is necessary to ensure that the Debtor can retain Experts to assess the cause and circumstances surrounding the Incident before evidence is removed and/or destroyed in connection with the cleanup and remediation of the Charleston Facility as may be required by environmental agencies exercising their police powers. Decommissioning of the Charleston Facility is set to commence on March 15, which is less than thirty (30) days away, and ground and metallurgical testing has already commenced by parties with interests adverse to the Debtor and the bankruptcy estate.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. If the Debtor is not granted expedited consideration of this Motion, the Debtor may be irreparably damaged.

4. As such, the Debtor requests an expedited hearing on the Motion.

WHEREFORE, the Debtor respectfully requests that the Court enter the accompanying Order scheduling a hearing on the Motion on an expedited basis, and for all other relief that the Court may deem just and proper.

Dated: February 14, 2014

Respectfully submitted,

BARTH & THOMPSON

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