

130000-07

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**RECEIVED-FPSC  
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COMMISSION  
CLERK**

IN RE

**KLN STEEL PRODUCTS COMPANY LLC,  
DEHLER MANUFACTURING CO., INC.,  
FURNITURE BY THURSTON, AND  
4200 PAN AM LLC  
DEBTORS**

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**CASE NO. 11-12855  
CASE NO. 11-12856  
CASE NO. 11-12858  
CASE NO. 11-13154**

**4200 N. PAN AM EXPRESSWAY  
SAN ANTONIO, TX 78218  
EINS: 20-5668753, 36-3571107; 68-0085339,  
26-2726699**

**Jointly Administered Under  
CASE NO. 11-12855  
(Chapter 11)**

**DEBTORS' MOTION FOR EXPEDITED HEARING**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW UPH Holdings, Inc., ("UPH"), Pac-West Telecom, Inc., ("Pac-West"), Tex-Link Communications, Inc. ("Tex-Link"), UniPoint Holdings, Inc. ("UniPoint Holdings"), UniPoint Enhanced Services, Inc. ("UniPoint Enhanced"), UniPoint Services, Inc., ("UniPoint"), nWire, LLC ("nWire"), and Peering Partners Communications, LLC ("Peering Partners") (collectively the "Debtors"), by and through their proposed, undersigned counsel, file this Motion for Expedited Hearing on the Debtors' Motion for Order Authorizing (1) the Payment of Pre-Petition Contract Amounts to Contract Labor; and (2) the Payment of Certain Pre-Petition Employee Benefits ("Motion"), and in support, would show the Court as follows:

**COM \_\_\_\_\_  
AFD \_\_\_\_\_  
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CLK Ng**

1. On March 28, 2013, the Debtors filed their voluntary Chapter 11 petitions (the "Petition Date") in the above-styled and numbered bankruptcy cases (the "Bankruptcy Cases"). On April 2, 2013, the Court entered an order authorizing joint administration of the reorganization cases. The Debtors continue in possession of their property and management of their business as debtors-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

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2. On April 4, 2013, the Debtors filed their Motion for Order Authorizing (1) the Payment of Pre-Petition Contract Amounts to Contract Labor; and (2) the Payment of Certain Pre-Petition Employee Benefits [Dckt. No. 49].

3. The Debtors have several matters set before the Court for hearings on April 15, 2013, including a final hearing on its Cash Collateral. An expedited hearing is necessary in order for the Motion to be heard prior to the Cash Collateral being heard so that a revised cash flow projection may be submitted. In addition, an expedited hearing is necessary on the Motion because the relief requested in the Motion is essential to maintain stability of the Debtors' operations in terms of retaining current staff.

4. Accordingly, the Debtors thus respectfully request a hearing date of April 15, 2013, at 1:30 p.m., on the Motion.

WHEREFORE, the Debtors respectfully request that the Court set a hearing on the above motions for April 15, 2013 at 1:30 p.m., and that the Court grant the Debtors such other and further relief as is just and equitable.

Dated: April 4, 2013.

Respectfully submitted,

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**PROPOSED COUNSEL FOR  
DEBTORS-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of April 2013, a true and correct copy of the foregoing Order was served via the Court's CM/ECF electronic notification system on all parties requesting same, and via US first class mail, post prepaid to the parties listed on the attached service list.

UPH Holdings, Inc.  
Pac-West Telecomm, Inc.  
Tex-Link Communications, Inc.  
UniPoint Holdings, Inc.  
UniPoint Enhanced Services, Inc.  
UniPoint Services, Inc.  
nWire, LLC  
Peering Partners Communications, Inc.  
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Austin, Texas 78730

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Chapter 11 Trustee  
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Ilana Volkov  
COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.  
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Hackensack, New Jersey 07601

/s/Patricia B. Tomasco  
Patricia B. Tomasco