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6 [Proposed] Attorneys for OFFICIAL COMMITTEE
OF UNSECURED CREDITORS

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re
12 HASHFAST TECHNOLOGIES, LLC, *et al.*,¹
13 Debtors.

Case No.: 14-30725
(Jointly Administered with HashFast LLC,
Case No. 14-30866)
Chapter 11
[Proposed] Hearing
Date: July 28, 2014
Place: 235 Pine St., 19th Floor
San Francisco, CA 94104
Judge: Honorable Dennis Montali

14 **UNOPPOSED *EX PARTE* APPLICATION FOR ORDER SETTING THE OFFICIAL**
15 **COMMITTEE OF UNSECURED CREDITORS' MOTION FOR SUBSTANTIVE**
16 **CONSOLIDATION FOR HEARING ON JULY 28, 2014 AT 2:00 P.M.**

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21 The Official Committee of Unsecured Creditors (the "Committee") in the above-captioned
22 bankruptcy case of HashFast Technologies, LLC hereby files this unopposed² ex parte application
23 ("Application") to set a hearing on the Committee's Motion for Substantive Consolidation
24 [D.E. 148] (the "Motion"), which requests that the Court substantively consolidate the jointly-
25 administered estates of the Debtors into one bankruptcy estate, on July 28, 2014 at 2:00 p.m. The
26 Debtors consent to the relief requested in this Application.

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28 ¹ The Debtors are HashFast LLC (FEIN 46-2943354) and HashFast Technologies LLC (FEIN 38-3913245).
² The Debtors consent to the relief requested in this Application.

1 The Committee respectfully requests that the Court set this Motion on shortened time so
2 that the Court may consider the Committee's Motion at the same hearing that the Court considers
3 the Debtors' motion to sell property of the estates [D.E. 134] which is scheduled for hearing at the
4 same date and time. The Committee's position at July 28, 2014 hearing may depend, in part, on
5 the Court's ruling on the Committee's Motion.

6 The Committee has not made any previous time modifications related to the subject of this
7 Application.

8 The Committee respectfully requests that:

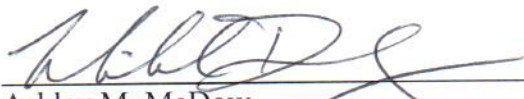
- 9 1. The Court enter an order setting the Motion for hearing on July 28, 2014 at 2:00
10 p.m.
- 11 2. The Court authorize that any objections to the relief requested in the Motion be
12 raised at the July 28, 2014 hearing; and
- 13 3. The Court grant all other relief that is appropriate under the circumstances.

14 Dated: July 23, 2014

Respectfully submitted,

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16 BAKER & HOSTETLER LLP

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18 By:


Ashley M. McDow
Michael T. Delaney

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20 [Proposed] Attorneys for Official Committee of
21 Unsecured Creditors

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28 UNOPPOSED *EX PARTE* APPLICATION FOR ORDER SETTING THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR
SUBSTANTIVE CONSOLIDATION FOR HEARING ON JULY 28, 2014 AT 2:00 P.M.

603836522.1

DECLARATION OF ASHLEY M. MCDOW

I, Ashley McDow, hereby declare as follows:

1. I am an attorney at Baker & Hostetler LLP, which serves as proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned bankruptcy case of HashFast Technologies, LLC. I have personal knowledge of the facts set forth below, to which I could and would testify if called upon to do so.

2. This Declaration is submitted in support of the Committee’s unopposed *ex parte* application (“Application”) to set a hearing on its Motion for Substantive Consolidation (the “Motion”) on July 28, 2014 at 2:00 p.m.


3. The reason for this request to shorten time is so the Court may consider the Committee’s Motion at the same hearing that the Court considers the Debtors’ motion to sell property of the estates [D.E. 134] which is scheduled for hearing at the same date and time. The Committee’s position at July 28 hearing may depend, in part, on the Court’s ruling on the Committee’s Motion.

4. There have been no previous time modifications related to the subject matter of this request, and the effect of the requested time modification on the schedule of this case does not cause any delay or have a negative effect on the administration of these cases. Instead, the requested time modification assists in consolidating matters on the Court’s calendar regarding these cases, assists with the efficiency of case administration and will preserve assets of the estates from fees and costs incurred in attending a second hearing in these cases on this sole matter.

5. The Committee has conferred with counsel for the Debtors, who consent to the relief requested in the Application.

6. A copy of the proposed order granting the Application is attached hereto as **Exhibit A**.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed at Los
2 Angeles, California, on this 23rd day July, 2014.

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5 _____
6 Ashley M. McDow

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BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
LOS ANGELES

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UNOPPOSED *EX PARTE* APPLICATION FOR ORDER SETTING THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR
SUBSTANTIVE CONSOLIDATION FOR HEARING ON JULY 28, 2014 AT 2:00 P.M.

603836522.1

EXHIBIT “A”

1 Ashley M. McDow (245114)
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7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re

12 HASHFAST TECHNOLOGIES, LLC, *et al.*,¹
13 Debtors.

Case No.: 14-30725

(Jointly Administered with HashFast LLC,
Case No. 14-30866)

Chapter 11

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15
16 **ORDER GRANTING UNOPPOSED *EX PARTE* APPLICATION FOR ORDER SETTING**
17 **THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR**
18 **SUBSTANTIVE CONSOLIDATION FOR HEARING ON JULY 28, 2014 AT 2:00 P.M.**

19 The Court having considered the Official Committee of Unsecured Creditors of HashFast
20 Technologies, LLC's Unopposed *Ex Parte* Application ("Application") for an order shortening
21 time on the motion (the "Motion") to substantively consolidate the above-captioned Debtors and
22 the declaration of Ashley McDow in support of the Application,

23 IT IS HEREBY ORDERED as follows:

- 24 1. The Application is approved.
25 2. The hearing on the Motion is hereby set for July 28, 2014 at 2:00 p.m.

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28 ¹ The Debtors are HashFast LLC (FEIN 46-2943354) and HashFast Technologies LLC (FEIN38-3913245).

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3. Any objection to the relief requested in the Motion may be filed prior to the hearing or presented orally at the hearing.

END OF ORDER

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11601 Wilshire Boulevard, Suite 1400, Los Angeles, CA 90025-0509

A true and correct copy of the foregoing document entitled (*specify*): **UNOPPOSED EX PARTE APPLICATION FOR ORDER SETTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR SUBSTANTIVE CONSOLIDATION FOR HEARING ON JULY 28, 2014 AT 2:00 P.M.** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 23, 2014**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL OR EMAIL (*state method for each person or entity served*): On (*date*) **July 23, 2014**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, addressed and/or by email as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Ray E. Gallo: rgallo@gallo-law.com
Via Email

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, OR FACSIMILE TRANSMISSION (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **July 23, 2014**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), and/or by facsimile transmission as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Dennis Montali
U.S. Bankruptcy Court Northern
Division of California
235 Pine Street, 19th Floor
San Francisco, CA 94104
Via Personal Delivery

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 23, 2014

Date

Sonia Gaeta

Printed Name

/s/ Sonia Gaeta

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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