

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

KATTEN MUCHIN ROSENMAN LLP  
Craig A. Barbarosh (SBN 160224)  
craig.barbarosh@kattenlaw.com  
650 Town Center Drive, Suite 700  
Costa Mesa, CA 92626-7122  
Telephone: (714) 966-6822

Jessica M. Mickelsen (SBN 277581)  
jessica.mickelsen@kattenlaw.com  
2029 Century Park East, Suite 2600  
Los Angeles, CA 90067-3012  
Telephone: (310) 788-4425  
Facsimile: (310) 788-4471

Peter A. Siddiqui (*pro hac vice*)  
peter.siddiqui@kattenlaw.com  
525 W. Monroe Street  
Chicago, IL 60661-3693  
Telephone: (312) 902-5455  
Facsimile: (312) 902-1061

[Proposed] Counsel for Debtors and Debtors-In-Possession  
Hashfast Technologies LLC and Hashfast LLC

**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)**

<p>In re:</p> <p>HASHFAST TECHNOLOGIES LLC, a California limited liability company,</p> <p style="padding-left: 40px;">Debtor and Debtor-In-Possession</p> <hr style="width: 30%; margin-left: 0;"/> <p><input type="checkbox"/> Affects HASHFAST LLC, a Delaware limited liability company,</p> <p style="padding-left: 40px;">Debtor and Debtor-In-Possession</p>	<p>) Lead Case No. 14-30725</p> <p>) (Proposed to be) Jointly Administered with:</p> <p>) Case No. 14-30866</p> <p>) <b>AMENDED EX PARTE APPLICATION</b></p> <p>) <b>FOR ORDER SHORTENING TIME</b></p> <p>) <b>AND SETTING HEARING ON</b></p> <p>) <b>DEBTORS' MOTION TO AMEND</b></p> <p>) <b>STIPULATION AND FURTHER</b></p> <p>) <b>ORDER WITH RESPECT TO</b></p> <p>) <b>EMERGENCY MOTION OF</b></p> <p>) <b>LIQUIDBITS CORP. FOR ENTRY OF</b></p> <p>) <b>AN ORDER APPOINTING A</b></p> <p>) <b>CHAPTER 7 TRUSTEE PURSUANT TO</b></p> <p>) <b>SECTION 303(G) OF THE</b></p> <p>) <b>BANKRUPTCY CODE OR FOR</b></p> <p>) <b>ALTERNATIVE RELIEF</b></p> <p>) <u>[Proposed] Hearing</u></p> <p>) Date: June 27, 2014</p> <p>) Time: 10:00 a.m.</p> <p>) Place: 235 Pine St., 19<sup>th</sup> Floor</p> <p>) San Francisco, CA 94104</p> <p>) Judge: Honorable Dennis Montali</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FIRST AMENDED EX PARTE APPLICATION FOR ORDER SHORTENING TIME ON THE MOTION TO  
AMEND THE STIPULATED AND FURTHER ORDER [DOCKET NO. 31]

**Katten**  
KattenMuchinRosenman LLP  
2029 Century Park East, Suite 2600  
Los Angeles, CA 90067-3012  
310.788.4400 tel 310.788.4471 fax

1 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**  
2 **JUDGE:**

3 The above-captioned debtors and debtors-in-possession (the “Debtors”) hereby file this  
4 amended *ex parte* application (“Application”) to set a hearing on their motion (the “Motion”) to  
5 amend the *Stipulated and Further Order with Respect to Emergency Motion of Liquidbits Corp.*  
6 *for Entry of an Order Appointing a Chapter 7 Trustee pursuant to Section 303(g) of the*  
7 *Bankruptcy Code or for Alternative Relief* (the “Stipulated Order”) [Doc. No. 31] on June 27,  
8 2014, at 10 a.m. This Motion is being brought to clarify that the Debtors may sell their inventory  
9 in their own judgment, in the ordinary course of business, without being subject to the strictures  
10 of the Stipulated Order.

11 Debtors respectfully request the Court to set this Motion on shortened time so that the  
12 Debtors may operate their business and sell their inventory in the ordinary course of business,  
13 according to their rights under Section 363 of the United States Bankruptcy Code (“Code”), as  
14 further set forth in the Motion. Debtors also respectfully request the Court to set this Motion on  
15 shortened time to be heard on the same date and time as the other matters set to be heard on June  
16 27, 2014, at 10 a.m., in the above-captioned case, for the sake of judicial economy and to  
17 preserve estate assets.

18 The basis in support of the Motion is set forth in the concurrently filed *Amended*  
19 *Declaration of Jessica M. Mickelsen* and the previously filed *Declaration of Monica Hushen In*  
20 *Support of the Motion* [Docket No. 68-1]. Debtors have separately noticed the Motion, as  
21 proposed to be heard on June 27, 2014, at 10 a.m. In that notice, Debtors indicated that should  
22 the Court set another date and time for the hearing, Debtors will notice that new date and time.

23 Debtors, thus, respectfully request that:

24 1. The Court enter an order shortening time for a hearing on the Motion, and setting  
25 the hearing on June 27, 2014 at 10:00 a.m.;

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

2. The Court order that no further notice is required on the Motion, if the hearing is set on June 27, 2014 at 10:00 a.m.;
3. The Court authorize that any objections to the relief requested in the Motion be raised at the hearing thereon; and
4. The Court grant Debtors such other and further relief as may be just and proper.

Dated: June 19, 2014

Katten Muchin Rosenman LLP  
Peter A. Siddiqui  
Jessica M. Mickelsen

By: /s/ Jessica M. Mickelsen  
[Proposed] Counsel for Debtors and  
Debtors-In-Possession Hashfast  
Technologies LLC and Hashfast LLC