

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLORADO**

In re:)	
)	
POSEIDON CONCEPTS CORP.,)	Chapter 15
Debtor in Foreign Proceeding.)	Case No. 13-15893-HRT
In re:)	
)	
POSEIDON CONCEPTS LTD.,)	Chapter 15
Debtor in Foreign Proceeding.)	Case No. 13-15894-HRT
In re:)	
)	
POSEIDON CONCEPTS LIMITED)	Chapter 15
PARTNERSHIP,)	Case No. 13-15895-HRT
Debtor in Foreign Proceeding.)	
In re:)	
)	
POSEIDON CONCEPTS INC.,)	Chapter 15
Debtor in Foreign Proceeding.)	Case No. 13-15896-HRT

**MOTION FOR EXPEDITED HEARING ON THE MONITOR’S:
(I) *EX PARTE* APPLICATION FOR ORDER TO SHOW CAUSE WITH TEMPORARY
RESTRAINING ORDER AND, AFTER NOTICE AND A HEARING, PRELIMINARY
INJUNCTIVE RELIEF, PURSUANT TO SECTIONS 105(a) AND 1519 OF THE
BANKRUPTCY CODE; AND (II) MOTION FOR ORDER DIRECTING
JOINT ADMINISTRATION OF THE DEBTORS’ CASES**

PricewaterhouseCoopers Inc. (“PWC”), as the court-appointed monitor (the “Monitor”) and authorized foreign representative of Poseidon Concepts Corp., Poseidon Concepts Ltd., Poseidon Concepts Limited Partnership, and Poseidon Concepts Inc. (collectively referred to as the “PC Debtors”) in the proceeding pending in the Court of Queen’s Bench of Alberta, Canada (the “Canadian Proceeding”) under the Companies’ Creditors Arrangement Act (the “CCAA”), by and through its undersigned counsel, respectfully moves this Court to expedite the hearing

(the “Expedited Hearing Motion”) on its: (i) Ex Parte Application For Order to Show Cause With Temporary Restraining Order and, After Notice and a Hearing, Preliminary Injunctive Relief, Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code (the “Injunction Application”), and scheduling a hearing on the Monitor’s request for a preliminary injunction as set forth therein; and (ii) Motion For Order Directing Joint Administration of the Debtors’ Cases (the “Joint Administration Motion”). In support of the Expedited Hearing Motion, the Monitor states as follows:

1. The Monitor seeks an expedited hearing on its Injunction Application because, as set forth more fully in the Injunction Application, the temporary restraining order requested therein (which will enjoin creditors from taking actions against the PC Debtors, its assets or the Monitor) is absolutely necessary to the PC Debtors’ restructuring efforts in the Canadian Proceeding. The Monitor further submits that irreparable harm will occur if the temporary restraining order is not entered as soon as possible. Accordingly, it is essential that the Monitor obtain the temporary restraining order on an expedited basis.

2. The Monitor also seeks an expedited hearing on the Joint Administration Motion, as the relief requested therein will streamline filing and notice procedures in these cases, resulting in reduced administrative burden to the Monitor, the PC Debtors, the Court, and other parties-in-interest. Such relief will not affect the substantive rights of any party in interest.

3. The Monitor respectfully requests that the Court schedule expedited hearings on the Injunction Application and the Joint Administration Motion.

WHEREFORE, the Monitor respectfully requests that the Injunction Application and Joint Administration Motion be heard on an expedited basis, and requests such other relief as this Court deems just and proper.

Dated: April 15, 2013

Respectfully submitted,

PRICEWATERHOUSECOOPERS INC.,
as Monitor and authorized foreign representative of
the PC Debtors

By: /s/ Chad S. Caby

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