

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>HII TECHNOLOGIES, INC., <i>et al.</i>,</b>	§	<b>Case No. 15-60070</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>Jointly Administered</b>
	§	
	§	
	§	

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**AGREED MOTION FOR CONTINUANCE OF HEARING ON CLAIM OBJECTIONS**

[Relates to Dkt. Nos. 431-438, 481-488, 515 & 517]

**To The Honorable David R. Jones, Chief United States Bankruptcy Judge:**

Elizabeth M. Guffy, Litigation Trustee (the “Trustee”) and William Mark Hamilton, Sharon K. Hamilton, William Craig Hamilton, and S&M Assets, LLC (collectively, the “Claimants”) file this agreed motion seeking a continuance of the hearing on the objections filed as to the Claimants’ claims, and respectfully represent as follows:

1. The Claimants filed eight proofs of claim against the debtors in these chapter 11 cases, HII Technologies, Inc., *et al.*, (the “Debtors”). On March 28, 2016, the Debtors filed separate objections to each of the Claimants’ claims [Dkt. Nos. 431-438] (the “Claim Objections”).

2. The hearing on the Claim Objections was originally scheduled for May 17, 2016, but was later continued to June 28, 2016, at 11:00.

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Apache Energy Services, L.L.C. (4404), HII Technologies, Inc. (3686), Aqua Handling of Texas, L.L.C. (4480), Hamilton Investment Group, Inc. (0150), and Sage Power Solutions, Inc. (1210).

3. On April 26, 2016, the Court entered an amended order confirming the Debtors' Third Amended Joint Plan of Reorganization (the "Plan"). The Plan became effective on May 20, 2016.

4. Under the terms of the Plan, the Trustee was authorized to pursue all objections to claims asserted against the Debtors, including the pending Claim Objections.

5. The Trustee has conferred with counsel for the Claimants, and the parties have reached an agreement to request that the Court continue the hearing on the Claim Objections to August 26, 2016, at 9:00 a.m. The parties believe that the requested continuance will give them additional time to attempt to resolve their disputes, or, should resolution not occur, to provide the Trustee time to consolidate the issues raised by the Claim Objections into an adversary proceeding.

WHEREFORE, the Trustee and the Claimants respectfully request that the Court enter an order continuing the hearing on the Claim Objections to August 25, 2016, at 9:00 a.m., and grant them such other and further relief as the Court deems just and proper.

Date: June 23, 2016

Respectfully submitted,

/s/ Elizabeth M. Guffy

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**LITIGATION TRUSTEE**

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**ATTORNEYS FOR CLAIMANTS**

**CERTIFICATE OF SERVICE**

I certify that, on June 23, 2016, a true and correct copy of the foregoing pleading was served via ECF on all parties who receive service in these Bankruptcy Cases via electronic case filing.

/s/ Elizabeth M. Guffy  
Elizabeth M. Guffy

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**ORDER GRANTING AGREED MOTION FOR CONTINUANCE  
OF HEARING ON CLAIM OBJECTIONS  
[Relates to Docket Nos. 431-438, 481-488, 515 & 517]**

The Court has considered the Agreement Motion for Continuance of Hearing on Claim Objections filed by Elizabeth M. Guffy, Litigation Trustee, and William Mark Hamilton, Sharon K. Hamilton, William Craig Hamilton, and S&M Assets, LLC, and is of the opinion that the requested relief should be granted. It is, therefore,

ORDERED that the hearing with regard to Docket Nos. 431-438 currently scheduled for Tuesday, June 28, 2016, at 11:00 a.m., is continued and rescheduled for August 25, 2016, at 9:00 a.m. (Houston time) before the Honorable David R. Jones, 515 Rusk, Courtroom 40, Houston, Texas 77002.

Dated: \_\_\_\_\_

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DAVID R. JONES,  
CHIEF UNITED STATES BANKRUPTCY JUDGE

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