

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

IN RE:	§	CASE NO. 17-51926-rbk
CROSSROADS SYSTEMS, INC.	§	
Debtor	§	CHAPTER 11 PROCEEDING

**EMERGENCY MOTION TO EXPEDITE HEARING ON DEBTOR’S EXPEDITED
MOTION FOR AN ORDER AUTHORIZING EMPLOYMENT AND PAYMENT OF
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

COMES NOW CROSSROADS SYSTEMS, INC., Debtor herein ("Debtor") and files this, its Motion to Expedite Hearing on Debtor’s Expedited Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business (the “Ordinary Course Professionals Motion”) and in support thereof, Debtor would respectfully show the Court as follows:

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On August 13, 2017, the Debtor filed its Voluntary Petition (the "Petition Date") under Chapter 11 of Title 11 of the Bankruptcy Code. Debtor is operating its business as a Debtor-in-Possession pursuant to §§ 107(a) and 1108 of the Bankruptcy Code.

3. Debtor requires immediate consideration of the Ordinary Course Professionals Motion because the professionals listed therein must provide essential services for the Debtor during the pendency of this Case.

4. A hearing on the Ordinary Course Professionals Motion is immediately necessary for the Debtors to be able to have their professionals in place as soon as possible in order to continue to operate their businesses and preserve the value of the estates.

5. Based on the foregoing, Debtor believes good cause exists to hear these matters on an emergency basis, and requests that the Court hear these matters as soon as possible.

WHEREFORE, Debtor respectfully requests this Court grant this motion and set the Debtor’s motions described herein for hearing as soon as possible, and grant it such other and

further relief, at law or in equity, to which it may be justly entitled.

Respectfully submitted this August 18, 2017.

ERIC TERRY LAW PLLC

By: /s/ Eric Terry

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PROPOSED COUNSEL FOR DEBTOR

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for 210, and he does not oppose the Motion. I have also conferred with the US Trustee and he does not oppose this Motion.

By: /s/ Eric Terry

Eric Terry

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this documents has been served on this 18th day of August, 2017 via Court's ECF System and/or via U.S. First Class Mail and email/fax if known to the top twenty unsecured creditors, counsel for 210, the United States Trustee, the holders of Preferred Interests, and any party requesting notice in this case. A copy of this document can also be downloaded on the Debtor's website at <https://www.crossroads.com>.

By: /s/ Eric Terry

Eric Terry