

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

IN RE: CROSSROADS SYSTEMS, INC. Debtor	§ CASE NO. 17-51926-rbk § § CHAPTER 11 PROCEEDING
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**EMERGENCY MOTION TO EXPEDITE HEARING ON DEBTOR’S APPLICATION
FOR ORDER PURSUANT TO BANKRUPTCY CODE SECTION 327(e) AND
BANKRUPTCY RULES 2014 AND 2016 AUTHORIZING EMPLOYMENT AND
RETENTION OF OLSHAN FROME WOLOSKY LLP AS SPECIAL COUNSEL TO
THE DEBTOR IN POSSESSION**

COMES NOW CROSSROADS SYSTEMS, INC., Debtor herein ("Debtor") and files this, its Motion to Expedite Hearing on Debtor’s Application for Order Pursuant to Bankruptcy Code Section 327(e) and Bankruptcy Rules 2014 and 2016 Authorizing Employment and Retention of Olshan Frome Wolosky LLP (the “Olshan 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 Olshan Motion because the Firm brings needed expertise as outside corporate counsel, particularly as the Firm is already familiar with the Debtor’s situation and needs during the pendency of this Case.
4. A hearing on the Olshan Motion is immediately necessary for the Debtors to be able to employ the Firm 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 24, 2017.

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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 24th day of August, 2017 via Court's ECF System and/or via U.S. First Class Mail to the twenty largest unsecured creditors, counsel for 210, the United States Trustee, and the holders of Preferred Interests (and by email/fax if known). 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

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