

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In The Matter Of:)	
)	
Briggs and Stratton Corporation)	Case Number: 20-43597-399
)	
Debtor)	
)	Chapter 11
Troy Craig, Diana Craig, and Amy Craig)	
)	
Movant,)	Millsap & Singer, LLC
)	612 Spirit Drive
vs.)	St. Louis, MO 63005
)	(636) 537-0110
Briggs & Stratton Corporation)	
)	Hearing Date: September 3, 2020
Respondent)	Hearing Time: 11:00 AM
)	Objection Deadline: September 3, 2020
)	

EXPEDITED NOTICE OF HEARING AND
MOTION TO EXPEDITE HEARING

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY SEPTEMBER 3, 2020. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.

IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.



REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS. THE HEARING TO BE HELD ON THE DATE AND TIME ABOVE BEFORE THE HONORABLE BARRY S. SCHERMER, IN THE UNITED STATES BANKRUPTCY COURT, EASTERN DISTRICT OF MISSOURI, THOMAS F. EAGLETON U.S. COURTHOUSE, 111 SOUTH TENTH STREET, FLOOR 5, NORTH COURTROOM, ST. LOUIS, MO 63102.

COMES NOW, Troy Craig, Diana Craig, and Amy Craig ("Movant"), and for its Motion for Expedited Hearing states as follows:

1. On July 20, 2020, Debtor filed a Petition under Chapter 11 of the Bankruptcy Code. The Official Unsecured Creditors Committee is composed of: Andrew W. Carty, Alexander L Moen, James W. Stoll, and Gregory D Willard.

2. Movants have filed a product liability lawsuit ("Lawsuit") against a number of entities which includes the Debtor. The suit is filed in the state of Wisconsin, Milwaukee County, Case Number 2020CV003953.

3. Movants' suit was filed on July 6, 2020, and an Answer and affirmative defenses were filed on August 6, 2020 by Defendant Wood Industries, Inc.

4. Movants were obligated under Wisconsin Statute 893.54 to bring its action within three years, and in order to comply with Wisconsin Statute 801.02, must complete service on all defendants in its Lawsuit within ninety (90) days after filing.

5. Movants intends to call for expedited hearing, the Motion for Relief from the Automatic Stay filed August 31, 2020 as document #655.

6. As more clearly illustrated in the Motion for Relief from the Automatic Stay, Movants must complete service on Debtor in order to properly identify Debtor's insurance providers and policies. Movants have also demonstrated sufficient cause in its Motion for the automatic stay to be lifted, that the hardship to Movants will greatly outweigh any prejudice to Debtor, and that Movants have a probability of prevailing on the merits of its Lawsuit.

7. An expedited hearing is necessary in order to prevent Movant from having to forego its litigation and chances of recovery.

WHEREFORE, Movants respectfully prays for an Order of this Court granting its Motion for Expedited Hearing on Movant's Motion for Relief from the Automatic Stay and for such further Orders as this Court deems just and proper in the premises.

Dated August 31, 2020

Respectfully Submitted:
Millsap & Singer, LLC

/s/ Cynthia M. Kern Woolverton

Cynthia M. Kern Woolverton, #47698, #47698MO
Stewart C. Bogart, #67956, #67956MO
Muhammad Esa Ahmed, #70619, #70619MO
Christopher D. Lee, #63024, #63024MO
612 Spirit Drive
St. Louis, MO
Telephone: (636) 537-0110
Facsimile: (636) 537-0067
bkty@msfirm.com

Attorneys for Troy Craig, Diana Craig, and Amy Craig

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on August 31, 2020, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ Cynthia M. Kern Woolverton

Electronic Mail Notice List

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Lauren Z. Alexander
Lauren.Alexander@weil.com

Ronit J. Berkovich
Ronit.Berkovich@weil.com

Corey D. Berman
Corey.Berman@weil.com

Andrew Citron
Andrew.Citron@weil.com

Lindsay Combs
lcl@carmodymacdonald.com

Angela L Drumm
ald@carmodymacdonald.com

Robert E. Eggmann
ree@carmodymacdonald.com

Debora A. Hoehne
Debora.Hoehne@weil.com

Christopher J. Lawhorn
cjl@carmodymacdonald.com

Martha E. Martir
Martha.Martir@weil.com

Janiel Jodi-ann Myers
Janiel.Myers@weil.com

Nicholas J. Pappas
nicholas.pappas@weil.com

Edward Soto
Edward.Soto@weil.com

Danielle A. Suberi
das@carmodymacdonald.com

Andrew M. Carty
acarty@brownrudnick.com

Alexander L Moen
amoen@dubllc.com

James W. Stoll
jstoll@brownrudnick.com

Gregory D Willard
gwillard@dubllc.com

Andrew M. Carty
acarty@brownrudnick.com

Alexander L Moen
Amoen@dubllc.com

James W. Stoll
jstoll@brownrudnick.com

Gregory D Willard
gwillard@dubllc.com

Office of the United States Trustee

Manual Notice List

The following is a list of parties who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

Briggs & Stratton Corporation
PO Box 702
Milwaukee, WI 53201

All Creditors on the Master Service List

Wilmington Trust N.A. 50 South Sixth Street, Suite 1290 Minneapolis, Minnesota 55402	MuniStrategies, LLC Muni Strategies Sub- CDE#24, LLC 2819 North State Street (39216- 4306) P.O. Box 2170 Jackson, MS 39225-2170	DV Community Investment, LLC DVCi CDE XXXIV, LLC c/o Dudley Ventures 22 E. Jackson Street Phoenix, AZ 85004
Zhejiang Zhouli Industrial Co Jinyanshan Industrial Zone Wuyi 130, CN 321210	Sears, Roebuck & Co. Bankruptcy 2600 Eagan Woods Drive, Suite 400 St. Paul, MN 55121	SunTrust Community Capital, LLC BS Statesboro Investment Fund, LLC ST CDE XXXVIII 1155 Peachtree Street, Suite 300 Atlanta, GA 30309
American Honda Motor Company Inc 1919 Torrance Blvd Torrance, CA Us 90501-2746	Jiangsu Jianghuai Engine Co Ltd No 58 South Xiwang Road Yancheng 100 CN 224007	Hydro-Gear Lp 120 South Lasalle St Chicago, IL US 60603-3403
Starting Usa Corporation 1676 Rowe Pkwy Poplar Bluff, MO US 63901-7014	Leslie and Daniel Fassett re: Matter #454 c/o Ross Feller Casey, LLP 1650 Market Street Suite 3450 Philadelphia, PA 19103	Zhejiang Constant Engine Yueying Road Paojiang Ind Com Park Shaoxing 130 Cn 312000
Anthem Blue Cross Blue Shield 1671 W Streetsboro Rd Peninsula, OH 44264	Changzhou globe co ltd no. 65 (3-4) Xinggang Road Zhonglou Zone, Changzhou 100 CN 213023	Metal Technologies 2260 Reliable Pkwy Chicago, IL US 60686-0022
Mazak Optonics Corporation 39003 Treasury Ctr Chicago, IL US 60694-9000	Accurate Fabrication Llc 2050 Constitution Ave Hartford, WI US 53027-8915	Green Bay Packaging Inc Bin 53139 Milwaukee, WI US 53288-0001
Trend Technologies LLC 4626 Eucalyptus Ave Chino, CA 91710	Hoffer Plastics Corporation Lock Box 6617 131 S. Dearborn Chicago, IL 60678-6617	R R Donnelley & Sons Company 7810 Solution Ctr Chicago, IL US 60677-0001
Plastocon Inc 1200 W 2nd St Oconomowoc, WI 53066-3403	Wright Metal Products Crates LLC 111 Franklin St Lavonia, GA US 30553-4403	Dantherm S.P.A. Via Gardesana 11 37010 Pastrengo (vr), Italy

Dutchland Plastics Llc
54 Enterprise Ct
Oostburg, WI UU 53070-1656

G H Tool & Mold Inc
28 Chamber Dr
Washington, MO US 63090-5279

Pro Unlimited, Inc.
7777 Glades Road Suite 208
Boca Raton, FL 33434

A R North America
140 81st Ave Ne
Minneapolis, MN US 55432-1770

CDW Limited
200 N Milwaukee Avenue
Vernon Hills, IL 43785

Leland Powell
Fasteners LLC 2
88 Holbrook Drive
Wheeling, IL 60090