

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:)	
)	Case No. 20-43597-399
BRIGGS & STRATTON)	
CORPORATION,)	
)	Chapter 11
Debtors.)	
)	
)	Hearing Date: September 17, 2020
BRENDA KELLEY,)	
)	Hearing Time: 10:00 a.m.
Movant,)	
)	Hearing Location: Eagleton Federal Courthouse
)	Courtroom 5 North
v.)	
)	Response Due: September 17, 2020
BRIGGS & STRATTON)	
CORPORATION,)	
)	
Respondent.)	

**MOTION TO EXPEDITE HEARING DATE ON MOTION FOR
RELIEF FROM STAY**

COMES NOW Movant BRENDA KELLEY, by and through the undersigned Counsel and for its Motion to Expedite Hearing on Motion for Relief from Stay respectfully states as follows:

1. BRIGGS & STRATTON CORPORATION (Debtor herein) commenced this case by filing a voluntary petition under Chapter 11 of the U.S. Bankruptcy Code on July 20, 2020.
2. Movant was suffered injury related to a product of the debtor as set out in the related Motion
3. Counsel for Movant has been advised by Movant's co-counsel that certain statutes of limitation are approaching which could preclude recovery is the suit is not timely filed.
4. Debtor has consolidated numerous cases and the Court has entered into Scheduling orders which have no other dates currently available other than the September hearing date.



5. Movant has expended significant time and monies investigating its cause of action and has not been dilatory in same and wishes only to proceed with the litigation in order to ascertain insurance coverage and seek to liquidate its claim.

6. There appear to be very few scenarios that the sale of the Debtors assets, as contemplated, will allow distribution to unsecured creditors.

7. On information and belief if this hearing is not held on an expedited basis Movant will not be able to seek redress before this Court due to the lack of other hearing dates currently scheduled in the case.

8. The interests of justice and the interests of the bankruptcy case will be best served by shortening the notice period and allowing Movant to proceed with its motion on an expedited basis.

9. The Debtor will suffer new prejudice through the Court allowing shortening of time as requested.

WHEREFORE, Movant BRENDA KELLEY respectfully requests that this Court issue an order shortening the notice period for the motion referenced herein and set said motion for hearing on September 17th at 10:00 A.M. before this Court and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

WALTRIP & SCHMIDT, LLC

/s/Michael A. Becker
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on September 2nd, 2020, with the United States Bankruptcy Court and has been served on all counsel of record and the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Mail Service, first class, postage fully pre-paid, address to the party listed below on September 2nd, 2020.

Briggs & Stratton Corporation

PO Box 702

Milwaukee, WI 53201

dba **Briggs & Stratton Power Products Group, LLC**

dba **Briggs & Stratton Power Products, LLC**

dba **Briggs & Stratton Power Products Group**

/s/ Michael A. Becker