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IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re:)	Chapter 11
HARTFORD COMPUTER HARDWARE, INC., <i>et al.</i> , ¹		Case No. 11-49744 (PSH) (Joint Administration Pending)
Debtors.))	Hon. Pamela S. Hollis

DEBTORS' MOTION FOR AN ORDER EXTENDING THE TIME WITHIN WHICH THE DEBTORS MUST FILE THEIR (I) SCHEDULES OF ASSETS AND LIABILITIES, (II) SCHEDULE OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, <u>AND (III) STATEMENT OF FINANCIAL AFFAIRS</u>

The above-captioned debtors and debtors in possession (the "<u>Debtors</u>") submit this motion for entry of an order extending the time within which the Debtors must file their (i) schedules of assets and liabilities, (ii) schedule of executory contracts and unexpired leases, and (iii) statement of financial affairs (collectively, the "<u>Schedules and Statements</u>"). In support of this motion, the Debtors respectfully represent as follows:

INTRODUCTION

1. On the date hereof (the "<u>Petition Date</u>"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "<u>Bankruptcy Code</u>"), together with various motions and applications seeking certain typical "first day" orders.

2. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. No request has been made for the appointment of a trustee or examiner, and no official committee(s) has been appointed in these cases.



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4. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue of the Debtors' chapter 11 cases and this motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

5. The statutory bases for the relief requested herein are sections 105(a) and 521 of the Bankruptcy Code and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>").

BACKGROUND

6. The Debtors are one of the leading providers of repair and installation services in North America for consumer electronics and computers. The Debtors operate in three complementary business lines: parts distribution and repair, depot repair, and onsite repair and installation. Products serviced include laptop and desktop computers, commercial computer systems, flat-screen television, consumer gaming units, printers, interactive whiteboards, peripherals, servers, POS devices, and other electronic devices.

7. A more detailed explanation of the Debtors' businesses and operations, and the events leading to the commencement of these cases, is provided in the Affidavit of Brian Mittman filed in Support of First Day Relief contemporaneously herewith and which is incorporated herein by reference.

Relief Requested

8. By this motion, the Debtors respectfully request the entry of an order, pursuant to section 521(a) of the Bankruptcy Code and Rule 1007(c) of the Bankruptcy Rules, extending the time to file the Schedules and Statements to January 23, 2012.

¹ The Debtors are Hartford Computer Hardware, Inc. (FEIN 27-4297525), Nexicore Services, LLC (FEIN 03-0489686), Hartford Computer Group, Inc. (FEIN 36-2973523), and Hartford Computer Government, Inc (FEIN 20-0845960).

BASIS FOR RELIEF

9. Pursuant to Rules 1007(b) and (c) of the Bankruptcy Rules, a chapter 11 debtor must file its Schedules and Statements with its voluntary petition or within 14 days thereafter. Bankruptcy Rule 1007(c) provides a bankruptcy court with the ability to extend a debtor's time to file its Schedules "for cause." Fed. R. Bankr. P. 1007(c).

10. The Debtors submit that "cause" exists to extend the Debtors' time to file the Schedules and Statements. Due to the complexity of the Debtors' business, the diversity of their operations and assets, and the limited staffing available to gather, process and complete the required Schedules and Statements in the limited time available prior to the commencement of this case, the Debtors do not believe the 14 day automatic extension of time provided for by Rule 1007(c) of the Bankruptcy Rules will be sufficient to permit completion of the Schedules and Statements. The Debtors require additional time to bring their books and records up to date and to collect the data needed for the preparation and filing of the Schedules and Statements.

11. The Debtors further submit that the vast amount of information that must be assembled and compiled, the multiple locations of such information, and the large amount of employee and professional hours required for the completion of the Schedules and Statements all constitute good and sufficient cause for granting the extension of time requested herein.

12. Accordingly, the Debtors respectfully request that the Court extend by an additional 14 days, for a total of 28 days, until January 9, 2012, the date by which the Schedules and Statements must be filed pursuant to Bankruptcy Rule 1007.

13. Similar relief has been granted by this court in other chapter 11 cases. *See, e.g., In re Giordano's Enters., Inc.*, Case No. 11-06098 (ERW) (Bankr. N.D. Ill. Mar. 1, 2011); *In re Gas City, Ltd.*, Case No. 10-47879 (ERW) (Bankr. N.D. Ill. Nov. 19, 2010); *In re Hartmarx*

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14. *Corp.*, Case No. 09-02046 (BWB) (Bankr. N.D. Ill. Jan. 26, 2009); *In re Kimball Hill, Inc.*, Case No. 08-10095 (SPS) (Bankr. N.D. Ill. May 1, 2008).

NOTICE

15. The Debtors will provide notice of this motion to the following parties or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee; (b) the Debtors' secured lenders; (c) the creditors holding the thirty (30) largest unsecured claims on a consolidated basis; and (d) all known taxing authorities that have claims against the Debtors. In light of the nature of the relief requested, the Debtors submit that no further notice is required.

NO PRIOR REQUEST

16. No previous motion for the relief requested herein has been made by the Debtors to this or any other court.

WHEREFORE, the Debtors respectfully request entry of an order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

[Continued on Following Page]

Dated: December 12, 2011

Respectfully submitted,

By: <u>/s/ John P. Sieger</u>

John P. Sieger (ARDC No. 6240033) Peter J. Siddiqui (ARDC No. 6278445) Paige E. Barr (ARDC No. 6282474) KATTEN MUCHIN ROSENMAN LLP 525 West Monroe Street Chicago, Illinois 60661-3693 Telephone: (312) 902-5200 Facsimile: (312) 902-5200 Facsimile: (312) 902-1061 John.Sieger@kattenlaw.com Peter.Siddiqui@kattenlaw.com Paige.Barr@kattenlaw.com

Proposed Counsel to the Debtors and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re:)	Chapter 11
HARTFORD COMPUTER HAR INC., <i>et al.</i> , ¹) DWARE,))	Case No. 11-49744 (PSH) (Joint Administration Pending)
Debto) prs.)	Hon. Pamela S. Hollis

ORDER EXTENDING THE TIME WITHIN WHICH THE DEBTORS MUST FILE THEIR (I) SCHEDULES OF ASSETS AND LIABILITIES, (II) SCHEDULE OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, <u>AND (III) STATEMENT OF FINANCIAL AFFAIRS</u>

This matter coming before the Court on the Motion of the Debtors for an Order Extending the Time Within Which the Debtors Must File Their (i) Schedules of Assets and Liabilities, (ii) Schedule of Executory Contracts and Unexpired Leases, and (iii) Statement of Financial Affairs (the "<u>Motion</u>")²; the Court having reviewed the Motion and the Declaration in Support of First Day Relief; the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. § 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (d) notice of the Motion having been sufficient under the circumstances; and the Court having determined that the legal and factual basis set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED as follows:

1. The Motion is GRANTED.

¹ The Debtors are Hartford Computer Hardware, Inc. (FEIN 27-4297525), Nexicore Services, LLC (FEIN 03-0489686), Hartford Computer Group, Inc. (FEIN 36-2973523), and Hartford Computer Government, Inc. (FEIN 20-0845960).

² Capitalized terms not defined herein shall have the meaning given to them in the Motion.

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2. All objections to the Motion or the relief requested therein that have not been made, withdrawn, waived, or settled, and all reservations of rights included therein, hereby are overruled on the merits.

3. Notice of the Motion was proper, timely, adequate and sufficient under the particular circumstances.

4. The time within which the Debtors shall file their Schedules and Statements is extended to and including January 9, 2012.

5. Entry of this order shall be without prejudice to the Debtors' right to apply to this Court, upon appropriate notice, for further extension(s) of time to prepare and file such lists, schedules and statements.

6. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this order.

7. The terms and conditions of this order shall be immediately effective and enforceable upon its entry.

8. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this order.

Dated: _____, 2011

UNITED STATES BANKRUPTCY JUDGE