

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	:	Chapter 11
	:	
UNITED ROAD TOWING, INC. et al.,	:	Case No. 17-10249 (LSS)
	:	
Debtors.¹	:	Jointly Administered
	:	
	:	Ref. Nos. 44 and 57
	:	
	:	Hearing Date: March 6, 2017 at 11:00 am (ET)
-----	:	Obj. Deadline: February 27, 2017 at 4:00 pm (ET)

RE-NOTICE OF MOTIONS AND HEARING AND OBJECTION DEADLINES

PLEASE TAKE NOTICE that United Road Towing, Inc. and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), have filed the following motions (collectively, the “Motions”)² with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”):

1. Debtors’ First Omnibus Motion for Entry of an Order (A) Authorizing Rejection of Certain Unexpired Leases and Subleases, Effective Nunc Pro Tunc to February 8, 2017, and (B) Granting Related Relief [D.I. 44] (“Rejection Motion”); and
2. Debtors’ Motion for Entry of (A) Order (I) Scheduling a Hearing to Consider Approval of the Sale or Sales of Substantially All of the Debtors’ Assets, and the Assumption and Assignment of certain Executory Contracts and Unexpired Leases, (II) Approving Certain Bidding Procedures, Assumption and Assignment Procedures, and the Form and Manner of Notice Thereof, and

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: United Road Towing, Inc. (6962); URT Holdings, Inc. (8341); City Towing Inc. (2118); URS West, Inc. (3518); Bill & Wag’s, Inc. (3518); Export Enterprises of Massachusetts, Inc. (5689); Pat’s Towing, Inc. (6964); Keystone Towing, Inc. (6356); Ross Baker Towing, Inc. (9742); URT Texas, Inc. (3716); Mart-Caudle Corporation (1912); Signature Towing, Inc. (3054); WHW Transport, Inc. (3055); URS Southeast, Inc. (7289); URS Northeast, Inc. (7290); URS Southwest, Inc. (7284); Fast Towing, Inc. (5898); E&R Towing & Garage, Inc. (8500); Sunrise Towing, Inc. (7160); Ken Lehman Enterprises Inc. (1970); United Road Towing of South Florida, Inc. (9186); Rapid Recovery Incorporated (1659); United Road Towing Services, Inc. (2206); Arri Brothers, Inc. (7962); Rancho Del Oro Companies, Inc. (3924); CSCBD, Inc. (2448); URS Leasing, Inc. (9072); UR VMS LLC (4904); UR Vehicle Management Solutions, Inc. (0402). The Debtors’ mailing address is c/o United Road Towing, Inc., 9550 Bormet Drive, Suite 301, Mokena, Illinois 60448.

² **You were previously served with a copy of the each of the Motions.**

(III) Granting Related Relief and (B) One or More Orders (I) Approving the Sales or Other Acquisition Transactions for the Properties, (ii) Authorizing the Sales Free and Clear of all Encumbrances, (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (iv) Granting Related Relief [D.I. 57] (“Bid Procedures Motion” and the order requested in Part A, the “Bid Procedures Order”).

PLEASE TAKE FURTHER NOTICE that, **notwithstanding any prior notice to the contrary**, any responses or objections to the relief requested in (i) the Rejection Motion or (ii) the Bidding Procedures Motion with respect to entry of the Bidding Procedures Order must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned proposed counsel for the Debtors on or before **February 27, 2017 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, **notwithstanding any prior notice to the contrary**, if an objection is timely filed, served and received and such objection is not otherwise timely resolved, a hearing to consider such objection and the relief requested in (i) the Rejection Motion or (ii) the Bidding Procedures Motion with respect to entry of the Bidding Procedures Order as described above will be held before the Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, Courtroom No. 2, 824 North Market Street, 6th Floor, Wilmington, Delaware 19801 on **March 6, 2017 at 11:00 a.m. (ET)** (the “Hearing”).

IF NO OBJECTIONS TO EITHER (I) THE REJECTION MOTION OR (II) THE BIDDING PROCEDURES MOTIONS WITH RESPECT TO ENTRY OF THE BIDDING PROCEDURES ORDER ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE RESPECTIVE MOTIONS (TO THE EXTENT SCHEDULED FOR THE HEARING) WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 16, 2017
Wilmington, Delaware

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Ryan M. Bartley

M. Blake Cleary (No. 3614)
Ryan M. Bartley (No. 4985)
Andrew L. Magaziner (No. 5426)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

-and-

WINSTON & STRAWN LLP
Daniel J. McGuire
Grace D. D'Arcy
35 West Wacker Drive
Chicago, Illinois 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Carrie V. Hardman
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700

*Proposed Counsel for Debtors and
Debtors in Possession*