

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

In re:)	
)	
ADAM AIRCRAFT INDUSTRIES, INC.)	Case No. 08-11751 MER
EIN: 161643299,)	Chapter 7
)	
Debtor.)	

TRUSTEE’S MOTION TO LIMIT AND SHORTEN NOTICE

Jeffrey A. Weinman, as Chapter 7 Trustee for the Adam Aircraft Industries, Inc. bankruptcy estate (the “Trustee”), for his Motion to Limit and Shorten Notice (this “Limit Notice Motion”), states:

1. On February 15, 2008 (the “Petition Date”), Adam Aircraft Industries, Inc. (the “Debtor”), filed its voluntary petition for relief under Chapter 7 of Title 11, U.S.C. (the “Bankruptcy Code”). The Trustee is the duly appointed Chapter 7 Trustee in the Debtor’s bankruptcy case.

2. Before the Petition Date, the Debtor designed and manufactured advanced carbon composite aircraft and airframes for sale in civilian and government markets. The Trustee anticipates that a bulk sale of the Debtor’s assets at auction will maximize value for creditors.

3. Toward that end, and contemporaneously with this Limit Notice Motion, the Trustee has filed the following (together, the “Pending Motions”):

(a) Motion For Orders: (A) Authorizing and Scheduling an Auction to Solicit Bids for the Sale of Substantially all Assets of Debtor’s Bankruptcy Estate, Free and Clear of Liens, Claims, Interests and Encumbrances; (B) Approving Bid and Auction Procedures; (C)

Scheduling a Hearing to Consider Approval of the Sale; and (D) Establishing the Form and Manner of Notice;

(b) Motion to Establish Procedures for Determination of Cure Amounts and for Approval of Assumption and Assignment of Executory Contracts and Unexpired Leases Pursuant to an Auction Sale; and

(c) Motion for Limited Authority to Operate Business Pending Auction;

4. Although the Trustee does not believe that the relief requested in any of the Pending Motions requires notice and a hearing under the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, in an abundance of caution, the Trustee has served the Pending Motions together with a form of Notice Pursuant to Local Bankruptcy Rule 202 (the "Notice").

5. Through this Limit Notice Motion, the Trustee respectfully requests that the Court enter an order: (a) shortening the Notice period for any objections to the procedural relief requested by the Trustee to seven (7) calendar days, including mailing; and (b) limiting the scope of the parties in interest receiving the Notice.

6. In the absence of otherwise controlling deadlines for objections to the Pending Motions, L.B.R. 202 fixes the notice period at fourteen (14) days, plus an additional three (3) days for mailing. As set forth in the Pending Motions, time is of the essence in the Debtor's case to maximize value for the estate. The Trustee believes that a Notice period of seven (7) calendar days, including mailing, will afford parties an opportunity to review the Pending Motions and lodge any objections thereto, without substantial prejudice to the relief sought by the Trustee. In the absence of any objections, the Trustee respectfully seeks prompt entry of orders on the Pending Motions by March 7, 2008 – 21 days after the Petition Date (and thus not implicating

Fed. R. Bankr. P. 6003, to the extent it may bear on the procedural relief requested in the Pending Motions).

7. Rule 9006 of the Federal Rules of Bankruptcy Procedure authorizes the Court, in the exercise of its discretion, to reduce any notice period for cause. Fed. R. Bankr. P. 9006(c)(1). Reduction of a notice period may be afforded “with or without motion or notice . . . and ex parte motions for material reductions in the notice period are routinely granted by bankruptcy courts.” *State Bank of Southern Utah v. Gledhill (In re Gledhill)*, 76 F.3d 1070, 1084 (10th Cir. 1996) (quoting *Hester v. NCNB Texas Nat'l Bank (In re Hester)*, 899 F.3d 361, 364 n.3 (5th Cir. 1990)).

8. The Trustee has served the Notice on: (a) all parties who have entered an appearance in the Debtor's bankruptcy case to date; (b) the Office of the United States Trustee; (c) all parties known to the Trustee who may have interests in property of the estate; (d) all taxing authorities who may have an interest in the Debtor's case; (e) all parties known to the Trustee with executory contracts or unexpired leases; (f) the Debtor and its attorneys; and (g) utility service providers. That service list comprises approximately 100 entities.

9. Absent a limited list for service of the Notice, the Trustee would be required to serve the Notice on almost 800 unsecured creditors, equity holders and potential claimants.

10. The Trustee believes that the relief requested in this Limit Notice Motion is warranted under the circumstances of the Debtor's case and in the best interest of the estate.

WHEREFORE, the Trustee respectfully requests entry of an order granting this Limit Notice Motion and entering such other relief as deemed appropriate.

Dated this 28th day of February, 2008.

LINDQUIST & VENNUM P.L.L.P.

By:  /s/ Theodore J. Hartl

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Counsel for Jeffrey A. Weinman, Chapter 7 Trustee

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 28th day of February, 2008, a true and correct copy of the foregoing **TRUSTEE'S MOTION TO LIMIT AND SHORTEN NOTICE** was deposited in the United States mail, proper postage prepaid, addressed to the parties on the attached list.


/s/Laura Lee Rippe

Label Matrix for local noticing
1082-1
Case 08-11751-MER
District of Colorado
Denver
Thu Feb 28 14:54:06 MST 2008

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End of Label Matrix
Mailable recipients 10
Bypassed recipients 0
Total 10