

EXHIBIT P
(Notice of Motion)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

THE PRIVATEBANK AND TRUST COMPANY, as)	
Administrative Agent,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:15-CV-01600
)	
)	
GLOBAL STORAGE SOLUTIONS, LLC (F/K/A/ BELL)	Honorable Sara L. Ellis
VENTURES, LLC), ALL STATE TANK)	
MANUFACTURING, L.L.C., USA TANK SALES &)	
ERECTION COMPANY INC., M & W TANK)	Hearing Date: May 1, 2015
CONSTRUCTION CO., C&C TANK ERECTORS LLC,)	Hearing Time: 10:00 a.m.
TOTAL TANKS, LLC, and TANK HOLDINGS, INC.)	
)	
Defendants.)	
)	
)	

**NOTICE OF (I) ENTRY OF SALES PROCEDURE ORDER AND (II) RECEIVER’S
MOTION FOR ENTRY OF AN ORDER CONFIRMING SALES OF
SUBSTANTIALLY ALL OF CERTAIN OF THE RECEIVERSHIP
ENTITIES’ ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS,
ENCUMBRANCES AND INTERESTS AND GRANTING RELATED RELIEF**

Please Take Notice that on **May 1, 2015 at 10:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Sara L. Ellis, or any other Judge sitting in her stead in Courtroom 1403 of the Dirksen Federal Courthouse, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the **Receiver’s Motion for Entry of an Order Confirming Sales of Substantially all of Certain of the Receivership Entities’ Assets Free and Clear of all Liens, Claims, Encumbrances and Interests and Granting Related Relief** (the “Sales Confirmation Motion”)¹ a copy of which is available, free of charge, at <http://www.pedersenhoupt.com/eaccess.html>

**PURSUANT TO THE SALES PROCEDURE ORDER (as hereinafter defined),
OBJECTIONS TO THE SALES CONFIRMATION MOTION ARE DUE BY APRIL 29, 2015.**

The Receiver is seeking confirmation of the sales of substantially all of the assets (real property and personal property) of the following receivership entities: Global Storage Solutions, LLC (f/k/a/ Bell Ventures, LLC), USA Tank Sales & Erection Company Inc., M & W Tank Construction Co., Total Tanks, LLC and All State Tank Manufacturing, L.L.C.

On April 21, 2015, the Court entered the attached Order (A) Authorizing Sale of Substantially all of Certain of the Receivership Entities’ Assets Free and Clear of all Liens, Claims, Encumbrances and Interests; (B) Approving Sale Procedures and Manner Of Notice; (C) Scheduling a Hearing to Consider

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Sales Confirmation Motion.

Final Approval of Sale; and (D Granting Related Relief (the “Sales Procedure Order”). The Sales Procedure Order sets for the procedure by which the Receiver shall conduct the sales of the aforementioned assets.

Objections to the Sales Confirmation Motion shall be filed with the Court and served by electronic mail and overnight delivery upon the following: (i) counsel for the Receiver; Bryan E. Minier, Pedersen & Houpt, 161 N. Clark St., Ste. 2700, Chicago, Illinois, 60613, bminier@pedersenhaupt.com; (ii) counsel for the Lender: John P. Sieger, Katten Muchin Rosenman, 525 W. Monroe St., Chicago, Illinois, 60661, john.sieger@kattenlaw.com; (iii) counsel for the Subordinated Lender: Brian W. Hockett, Thompson Coburn LLP, One US Bank Plaza, St. Louis, Missouri, 63101, bhockett@thompsoncoburn.com; and (iv) counsel for the Proposed Purchaser, Randell D. Wallace and Dan Nelson, Lathrop & Gage LLP, 910 E. St. Louis, Ste. 100, Springfield, Missouri 65806, rwallace@lathrop.com, dnelson@lathrop.com, and Pat Corless, Waterous Holden Amey Hitchon, PO Box 1510, 20 Wellington St., Brantford, Ontario, N3T 5V6, pcorless@waterousholden.com.

You should consult with an attorney as to whether you should file an objection to the Sales Confirmation Motion.

Dated: April 24, 2015

Respectfully Submitted,

Tank Operations, LLC, not in its corporate capacity, but solely as court appointed receiver in that certain action entitled The PrivateBank and Trust Company, as Administrative Agent v. Global Storage Solutions, LLC (F/K/A Bell Ventures, LLC), et al., currently pending in the United States District Court for the Northern District of Illinois under case number 15-cv-01600

By: /s/ Bryan E. Minier
One of Its Attorneys

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