

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

THE PRIVATEBANK AND TRUST COMPANY, as)
Administrative Agent,)
)
Plaintiff,)
)
v.)
)
GLOBAL STORAGE SOLUTIONS, LLC (F/K/A/)
BELL VENTURES, LLC), ALL STATE TANK)
MANUFACTURING, L.L.C., USA TANK SALES)
& ERECTION COMPANY INC., M & W TANK)
CONSTRUCTION CO., C&C TANK ERECTORS)
LLC, TOTAL TANKS, LLC, and TANK)
HOLDINGS, INC.,)
)
Defendants.)

Case No. 1:15-CV-01600

Judge: The Honorable Sara L. Ellis

NOTICE OF MOTION

To: Parties on attached service list.

PLEASE TAKE NOTICE that on **Friday, 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 **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**, a copy of which is hereby served upon you.

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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