

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : Case No. 1:17-bk-00581-RNO  
OUTSOURCING STORAGE, INC. :  
: Chapter 11

**MOTION TO APPROVE DISCLOSURE STATEMENT AND  
VOTING PROCEDURES, AND TO FIX TIME FOR  
CONFIRMATION HEARING AND FOR FILING  
ACCEPTANCES OR REJECTIONS OF PLAN**

The Motion of Outsourcing Storage, Inc. ("Debtor") to Approve Disclosure Statement and Voting Procedures, and to Fix Time for Filing Acceptances or Rejections of the Plan of Reorganization proposed by the Debtor is as follows:

1. On February 14, 2017, the Debtor filed a Petition for Relief under Chapter 11 of the Bankruptcy Code.

2. The Debtor has now filed a Plan of Reorganization ("Plan") and a Disclosure Statement ("Disclosure Statement") in support thereof.

3. The Debtor requests that an Order be entered setting the time for the approval of the Disclosure Statement, providing for twenty-eight (28) days' notice thereof. The Debtor also requests that following the approval by the Court of the Disclosure Statement, that the hearing for the confirmation of the Plan occur upon twenty-eight (28) days' notice thereof. The Debtor requests that there be included in such Order the following:

a. That the Court fix a date not less than seven (7) days after entry of an Order approving the Disclosure Statement, for service of the Order Approving Ballot Procedures and Fixing Time for Filing of Acceptances or Rejections of the Plan, the Plan, Disclosure Statement and Ballots on those parties entitled to receive such Ballots.

Service is to be made on those parties in interest and creditors as required by the

Bankruptcy Code, Bankruptcy Rules and in further accordance with the Order requested by the Debtor through this Motion.

b. Ballots shall be distributed only to those classes which are impaired. In order to be counted, ballots must be sent to counsel for the Debtor at the following address:

Robert E. Chernicoff, Esquire  
CUNNINGHAM, CHERNICOFF & WARSHAWSKY, P.C.  
2320 North Second Street  
P. O. Box 60457  
Harrisburg, PA 17106-0457

c. To be effective, a ballot must be received at the address set forth above by 4:00 p.m., Harrisburg, Pennsylvania time, on a date certain to be set by the Court which date is to be set no less than twenty-eight (28) days after service of the Disclosure Statement, Plan and ballot.

d. That the same date fixed for ballots to be received by counsel for the Debtor also be fixed for the last day for the filing of ballots setting forth a written acceptance or rejection of the Plan also be fixed as the last day for filing and serving, pursuant to Rule 3020(b)(1), written objections to the confirmation of the Plan.

e. That the Debtor be required to file with the Court a tabulation of ballots accepting or rejecting the Plan within five (5) days after the deadline for the receipt of ballots setting forth written acceptances or rejections.

f. That the Court fix a date for the hearing on the confirmation of the Plan which date shall be as soon as practical after the last date for the receipt of ballots, but not less than seven (7) days after such date.

g. That any misstatement by a creditor as to its classification may be corrected by the Debtor.

h. That any statement contained in a ballot as to an amount which a claim holder alleges is due shall not fix the amount of the claim which can only occur as set forth in the Bankruptcy Code and Rules, and that the amount of any claim shall be as set forth on the Debtor's Schedules unless a particular creditor has an allowed claim as a result of a proof of claim or as otherwise set forth in the Plan.

**WHEREFORE**, it is respectfully requests that the Court enter an Order approving the Disclosure Statement, fixing a time for the hearing on confirmation of the Plan of Reorganization and fixing the time for filing acceptances or rejections to the Plan, together with the voting procedures as set forth above, in the within case.

Respectfully submitted,

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

By: /s/ Robert E. Chernicoff  
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Date: December 11, 2017