

of Substantially All of the Debtors' Assets Free and Clear of Any and All Liens, Claims, Encumbrances, and Other Interests, (III) Authorizing Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [Docket No. 108] (the "U.S. Sale Motion"),² hereby files this motion (the "Motion to Shorten"), pursuant to Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), requesting that this Court enter an order (the "Proposed Order"): (a) shortening the time for notice of the hearing to consider the U.S. Sale Motion by one day so that the matter may be heard at the hearing scheduled for July 17, 2012 at 10:00 a.m. (prevailing Eastern Time) (the "Sale Hearing"); and (b) setting a deadline of July 11, 2012 at 4:00 p.m. (prevailing Eastern Time) for objections or responses to the U.S. Sale Motion (the "Objection Deadline"). In support of the Motion to Shorten, the Monitor respectfully represents as follows:

1. Rule 2002(a)(2) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") requires that the Monitor give at least 21 days' notice to parties in interest with respect to the relief requested in the U.S. Sale Motion. Pursuant to Local Rule 9006-1(e), however, that required notice period may be shortened by order of the Court upon written motion specifying the exigencies supporting shortened notice. The Monitor submits that there is sufficient cause to justify shortening the notice period, by one day, for the Sale Hearing.

2. On June 21, 2012, the Canadian Court granted the CCAA Vesting Order, pursuant to which the Canadian Court authorized and approved the sale (the "Sale") of the Debtors' right, title, and interest in and to substantially all of the Debtors' assets to the Purchaser,

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the U.S. Sale Motion.

free and clear of all Claims and Encumbrances, except as otherwise set forth in the Purchase Agreement.

3. On June 26, 2012, the Monitor filed the U.S. Sale Motion, which requests that this Court: (a) recognize and enforce the CCAA Vesting Order of the Canadian Court; (b) authorize and approve, pursuant to section 363(f) of the Bankruptcy Code, the Sale of the Debtors' right, title, and interest in and to the Purchased Assets to the Purchaser free and clear of all Interests, except as otherwise provided in the Purchase Agreement; (c) authorize and approve, to the extent provided in the CCAA Vesting Order, the assumption and assignment of the Assigned Contracts; and (d) grant certain related relief, including payment of the Lender Claims. Pursuant to the U.S. Sale Motion, the Monitor requested that objections or responses, if any, to the U.S. Sale Motion be received no later than July 10, 2012 at 4:00 p.m. (prevailing Eastern Time).

4. Contemporaneously with the filing of the U.S. Sale Motion, on June 26, 2012, the Monitor caused the U.S. Sale Motion to be served (by and through Kurtzman Carson Consultants LLC ("KCC")) upon the persons identified on Exhibits A, B, and C to the *Affidavit of Service*, dated June 27, 2012 [Docket No. 109] (the "109 Affidavit"). The persons identified in the 109 Affidavit include, among others, all persons upon whom notice is required pursuant to this Court's *Order Scheduling Hearing and Specifying Form and Manner of Service of Notice* [Docket No. 30] (the "Form and Manner Order"), the Debtors' prepetition secured lenders, the Debtors' postpetition secured lenders, the Office of the United States Trustee for the District of Delaware, the Internal Revenue Service, the United States Department of Justice, and all counterparties to material contracts that are being assigned to the Purchaser pursuant to the Purchase Agreement (collectively, the "109 Affidavit Parties").

5. However, through no fault of KCC, the Monitor, the Purchaser, or the Debtors, service to approximately 50% of the persons (the “June 27 Notice Parties”) identified on Exhibit A to the *Affidavit of Service*, dated June 27, 2012 [Docket No. 110] (the “110 Affidavit”), was not completed until one day later, June 27, 2012, due to (a) time constraints resulting from obtaining final approvals of the U.S. Sale Motion and related filings, and (b) the logistical difficulties associated with printing and mailing over 285,000 pages of documents to approximately 5,000 persons. Based on information that KCC has provided to the Monitor, approximately 50% (or 2,000) of the persons identified on Exhibit A to the 110 Affidavit were in fact provided with notice on June 26, 2012 (these persons, together with the 109 Affidavit Parties, the “June 26 Notice Parties”).

6. Moreover, substantially all of the June 26 Notice Parties and the June 27 Notice Parties had previously received notice of the hearing in the Canadian Court to consider entry of the CCAA Vesting Order.³ As of the date hereof, no party has filed any objection to or appeal from the CCAA Vesting Order.

7. The Monitor believes that it has substantially complied with applicable notice requirements contained in the Bankruptcy Rules, the Local Rules, and this Court’s Form and Manner Order. However, out of an abundance of caution, and to eliminate any ambiguity as to due process issues that could be used to delay the Debtors’ ability to consummate the Sale in the timeframe provided for in the Purchase Agreement and the SISF, the Monitor has determined to file the Motion to Shorten.

³ A small subset of the June 26 and/or the June 27 Notice Parties were not provided with timely notice of the hearing to consider the CCAA Vesting Order. In order to rectify this matter, the Debtors requested, and the Monitor supported, that the Canadian Court schedule a hearing for July 12 to allow such persons to object to the CCAA Vesting Order. The Canadian Court granted the Debtors’ request.

8. The Monitor submits that sufficient cause exists for this Court to enter the Proposed Order. Absent entry of the Proposed Order, it is possible that there could be ambiguity concerning compliance with notice requirements of the applicable Bankruptcy Rules and Local Rules. Such ambiguity could be used as a distraction to delay consideration of the U.S. Sale Order, which could affect the ability of the parties to close the Sale by the Outside Date (as defined in the SISP) of July 31, 2012.

9. As described more fully in the U.S. Sale Motion, the Sale represents a very positive realization of value for the Debtors' creditors and other stakeholders. The Purchaser not only submitted the highest and best offer under the SISP (and with the fewest conditions to closing of all bids received under the SISP), but the consideration provided under the Purchase Agreement (a) is sufficient to satisfy all known creditor claims, and, (b) subject to the completion of a claims process and the payment of obligations arising from the completion of the Sale, may be sufficient to make a distribution to the Debtors' unitholders. Furthermore, the Sale contemplates that the Purchaser will extend offers to hire all of the current employees of the Debtors in the U.S. and Canada. Thus, any uncertainty surrounding the Sale, no matter how technical or small, could be a detriment to the Debtors, their creditors, and other parties in interest.

10. Moreover, because (a) the proceeds of the Sale will be sufficient to satisfy all known creditor claims, and (b) the Monitor is requesting that this Court extend the Objection Deadline to July 11, 2012, the Monitor submits that no party in interest will be unduly prejudiced by shortening notice by one day so that the U.S. Sale Motion can be considered at the Sale Hearing.

11. For the foregoing reasons, the Monitor respectfully requests that this Court (a) shorten notice of the Sale Hearing by one day and, (b) set an objection deadline of July 11, 2012 at 4:00 p.m. (prevailing Eastern Time) for any party in interest that wishes to file a response or objection to the U.S. Sale Motion.

WHEREFORE, the Monitor respectfully requests that the Court enter the Proposed Order, substantially in the form annexed hereto as Exhibit A, granting the relief requested herein and any further relief the Court may deem just and proper.

Dated: Wilmington, Delaware
June 28, 2012

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Ian J. Bambrick

Robert S. Brady (No. 2847)
Matthew B. Lunn (No. 4119)
Ian J. Bambrick (No. 5455)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

- and -

WILLKIE FARR & GALLAGHER LLP

Marc Abrams
Mary K. Warren
Alex W. Cannon
787 Seventh Avenue
New York, New York 10019-6099
Telephone: (212) 728-8000
Facsimile: (212) 728-8111

*Co-Counsel to the Monitor and
Foreign Representative*

EXHIBIT A

Proposed Order

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

In re	:	Chapter 15
ARCTIC GLACIER INTERNATIONAL INC.,	:	Case No. 12-10605 (KG)
<i>et al.</i> , ¹	:	
	:	(Jointly Administered)
Debtors in a Foreign Proceeding.	:	
	:	Ref. Docket No. ____

**ORDER SHORTENING THE TIME FOR NOTICE OF
THE HEARING TO CONSIDER, AND SETTING DEADLINE
TO OBJECT OR RESPOND TO, THE MONITOR'S U.S. SALE MOTION**

Upon consideration of the motion (the "Motion to Shorten") of the Monitor for entry of an order: (a) providing that the applicable notice period for the U.S. Sale Motion² be shortened pursuant to Rule 9006-1(e) of the Local Rules; and (b) establishing a deadline for entities to object or respond to the U.S. Sale Motion; and the Court having determined that granting the relief requested by the Motion to Shorten is in the best interests of the Debtors, the Debtors' creditors, and other parties in interest; and it appearing that due and adequate notice of this Motion to Shorten and the U.S. Sale Motion has been given; and that no other or further

¹ The last four digits of the United States Tax Identification Number or Canadian Business Number, as applicable, follow in parentheses: (i) Arctic Glacier California Inc. (7645); (ii) Arctic Glacier Grayling Inc. (0976); (iii) Arctic Glacier Inc. (4125); (iv) Arctic Glacier Income Fund (4736); (v) Arctic Glacier International Inc. (9353); (vi) Arctic Glacier Lansing Inc. (1769); (vii) Arctic Glacier Michigan Inc. (0975); (viii) Arctic Glacier Minnesota Inc. (2310); (ix) Arctic Glacier Nebraska Inc. (7790); (x) Arctic Glacier New York Inc. (2468); (xi) Arctic Glacier Newburgh Inc. (7431); (xii) Arctic Glacier Oregon, Inc. (4484); (xiii) Arctic Glacier Party Time Inc. (0977); (xiv) Arctic Glacier Pennsylvania Inc. (9475); (xv) Arctic Glacier Rochester Inc. (6989); (xvi) Arctic Glacier Services Inc. (6657); (xvii) Arctic Glacier Texas Inc. (3251); (xviii) Arctic Glacier Vernon Inc. (3211); (xix) Arctic Glacier Wisconsin Inc. (5835); (xx) Diamond Ice Cube Company Inc. (7146); (xxi) Diamond Newport Corporation (4811); (xxii) Glacier Ice Company, Inc. (4320); (xxiii) Ice Perfection Systems Inc. (7093); (xxiv) ICEsurance Inc. (0849); (xxv) Jack Frost Ice Service, Inc. (7210); (xxvi) Knowlton Enterprises Inc. (8701); (xxvii) Mountain Water Ice Company (2777); (xxviii) R&K Trucking, Inc. (6931); (xxix) Winkler Lucas Ice and Fuel Company (0049); (xxx) Wonderland Ice, Inc. (8662). The Debtors' executive headquarters is located at 625 Henry Avenue, Winnipeg, Manitoba, R3A 0V1, Canada.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion to Shorten.

notice of such motions is necessary or required; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion to Shorten is granted.
2. The Sale Hearing will be held on July 17, 2012 at 10:00 a.m. (prevailing Eastern Time).
3. The Objection Deadline is extended to July 11, 2012 at 4:00 p.m. (prevailing Eastern Time).
4. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

Dated: Wilmington, Delaware
_____, 2012

The Honorable Kevin Gross
Chief United States Bankruptcy Judge