

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

IN RE: THINKSTREAM	*	CASE NO. 15-10553
INCORPORATED OF DELAWARE	*	
	*	CHAPTER 11 (Involuntary)
	*	
	*	JUDGE DOUGLAS D. DODD

**THINKSTREAM INCORPORATED OF DELAWARE’S
MOTION TO CONVERT PROCEEDING
TO VOLUNTARY ACTION UNDER CHAPTER 11**

NOW INTO COURT comes Thinkstream Incorporated of Delaware, who respectfully moves to convert this involuntary proceeding to a voluntary action under Chapter 11.

1. On May 11, 2015, petitioning creditors commenced this involuntary Chapter 11 action against Thinkstream Incorporated of Delaware under 11 U.S.C. §303.
2. Thinkstream desires to convert this involuntary action to a voluntary action under 11 U.S.C. § 301.
3. 11 U.S.C. § 303(h) provides that an order for relief shall be granted only upon certain findings after trial. The Court has set trial on the involuntary petition for July 20, 2015.
4. By contrast, under 11 U.S.C. § 301(b), “The commencement of a voluntary case under a chapter of this title constitutes an order for relief under such chapter.” Consequently, Thinkstream hereby moves for the immediate entry of an order for relief.
5. Thinkstream submits that conversion of this case moots the need for a hearing on July 20, 2015.
5. On July 6, 2015, the Court indicated it would grant the petitioning creditors’ motion for entry of an order appointing an interim trustee. Thinkstream nevertheless recognizes its obligations and responsibilities as a voluntary Chapter 11 debtor, and will comply with all

applicable governing provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, reserving unto all parties their rights with regard to the court's ruling with regard to appointment of the trustee.

Dated: July 8, 2015.

TAGGART MORTON, LLC

/s/ Barry Grodsky

Barry H. Grodsky, La. Bar Roll # 1388

Donald J. Miester Jr., La. Bar Roll # 20294

1100 Poydras Street, Suite 2100

New Orleans, Louisiana 70163

Telephone: (504) 599-8500

Facsimile: (504) 599-8501

bgrodsky@taggartmorton.com

dmiester@taggartmorton.com

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CASE NO. 15-10553

CHAPTER 11 (Involuntary)

JUDGE DOUGLAS D. DODD

ORDER

Considering the foregoing **MOTION TO CONVERT PROCEEDING TO
VOLUNTARY ACTION UNDER CHAPTER 11** filed by Thinkstream Incorporated of
Delaware,

It is hereby ORDERED that said motion be and the same is hereby GRANTED and the
involuntary proceeding is hereby converted to a voluntary case under Chapter 11 and the entry of
the order for relief is in effect as of the date of the granting of this order.

It is further ORDERED that the rights of all parties are reserved relating to the
appointment of a trustee made in the above-numbered and entitled proceeding as an involuntary
Chapter 11 bankruptcy.

Baton Rouge, Louisiana, _____, 2015.

UNITED STATES BANKRUPTCY JUDGE

