

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF KANSAS  
(Kansas City Division)**

<b>In Re:</b>	)	<b>In Proceedings Under Chapter 11</b>
	)	
<b>CRESCENT OIL COMPANY, INC.,</b>	)	<b>Case No.</b>
<i>et al.,</i>	)	
<b>Debtors.</b>	)	

**MOTION FOR JOINT ADMINISTRATION OF AFFILIATED CASES**

Debtors Crescent Fuels, Inc.; Crescent Realty, Inc.; Crescent Oil Company, Inc.; Crescent Stores Corporation; and Crescent Business Development Corp. (collectively, “Debtors”), pursuant to Federal Rule of Bankruptcy Procedure 1015(b), hereby request that the Court enter an Order authorizing the joint administration of the captioned cases (the “Motion”) and state as follows:

1. Debtor Crescent Oil Company, Inc. filed its voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Code”) on February 7, 2009.
2. The remaining Debtors commenced the captioned cases by filing separate voluntary petitions for relief under Chapter 11 of the (“Code”) on February 8, 2009 (the “Filing Date”).
3. Debtors continue to manage their property as debtors-in-possession pursuant to Code §§ 1107 and 1108.
4. Federal Rule of Bankruptcy Procedures Rule 1015(b) authorizes the joint administration of separate cases filed by a debtor and its affiliates without further Order of the Court. Code § 101(2)(B) defines “affiliate” to include a “corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled or held with power to vote. . . by an entity that directly or indirectly owns, controls, or holds the power to vote 20 percent or more of the outstanding voting securities of the debtors.” Crescent Realty, Inc.;

Crescent Oil Company, Inc.; Crescent Stores Corporation; and Crescent Business Development Corp. are wholly-owned subsidiaries of Crescent Fuels, Inc. and are eligible for joint administration with Crescent Fuels, Inc.

5. Joint administration of the captioned cases will result in significantly reduced administrative expenses and simplify the administration of these cases for all parties. Additionally, judicial economy will clearly be served by joint administration. The Motion neither requests, nor suggests, substantive consolidation of the captioned bankruptcy cases.

WHEREFORE, each of the separate entities comprising Debtors respectfully pray that this Court enter an Order:

- a. authorizing the joint administration of the captioned bankruptcy proceedings of Crescent Fuels, Inc.; Crescent Realty, Inc.; Crescent Oil Company, Inc.; Crescent Stores Corporation; and Crescent Business Development Corp.;
- b. providing that all pleadings be filed in the Crescent Oil Company, Inc. case; and
- c. granting such other and further relief as is just and proper.

Date: February 8, 2009

SPENCER FANE BRITT & BROWNE LLP

s/ Lisa A. Epps

Scott J. Goldstein      KS Fed. # 70505

Nicholas A. Franke    MO #37402

Lisa A. Epps            KS #18480

[sgoldstein@spencerfane.com](mailto:sgoldstein@spencerfane.com)

[nfranke@spencerfane.com](mailto:nfranke@spencerfane.com)

[lepps@spencerfane.com](mailto:lepps@spencerfane.com)

1000 Walnut, Suite 1400

Kansas City, MO 64106

(816) 474-8100

(816) 474-3216– Fax

ATTORNEYS FOR DEBTORS AND  
DEBTORS-IN-POSSESSION