

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AT CANTON**

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In re: : Chapter 11
 :
SCHWAB INDUSTRIES, INC., *et al.*, : Case no. 10-60702
 : (Jointly Administered)
 :
Debtors. :
 : Judge Russ Kendig
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**SUPPLEMENT TO REQUEST OF ALLEN CONCRETE & MASONRY, INC.
AND ALLEN CONCRETE PUMPING FOR ALLOWANCE AND
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM [DOCKET NO. 427]**

Allen Concrete & Masonry, Inc. (“Allen Concrete”) and Allen Concrete Pumping (“ACP” and together with Allen Concrete, “Claimants”), by and through their undersigned counsel, hereby supplement their pending Request for Allowance and Payment of Administrative Expense Claim [Docket No. 427] to cover the claim period through July 13, 2010. In support of this Supplement to Request, Allen Concrete and ACP state as follows:

BACKGROUND

1. The Debtors (including Schwab Ready-Mix, Inc.) filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on February 28, 2010 (the "Petition Date").
2. Currently pending before the Court is the Request of Allen Concrete & Masonry, Inc. and Allen Concrete Pumping for Allowance and Payment of Administrative Expense Claim and Motion to Compel Assumption or Rejection by Debtors of Partnership Agreement for Allen Concrete Pumping [Docket No. 427], which has been set for hearing on October 5, 2010

pursuant to an Amended Order Scheduling Evidentiary Hearing and Continuing Evidentiary Hearing [Docket No. 527] entered by the Court on July 7, 2010.

3. On July 9, 2010 the Court entered an Order Approving Debtors' Motion for Order Establishing Bar Date for Filing Prepetition Claims and Postpetition Administrative Claims and Approving Form and Manner of Notice thereof [Docket No. 529] ("Bar Date Order") which requires the filing of administrative expense claims accruing during the period from the Petition Date through July 13, 2010, on or before the bar date of August 12, 2010.

MODIFIED AND EXTENDED ADMINISTRATIVE EXPENSE CLAIM

4. The Request of Claimants only covered the period through May 31, 2010. This Supplement to Request modifies certain claim amounts and extends the claim period through July 13, 2010 in accordance with the Bar Date Order.

5. In connection with ACP and pursuant to the Partnership Agreement, Claimants have rendered inter-partnership loans and partnership advances to the Debtors in the amount of \$63,863.80 through July 13, 2010 and have incurred additional partnership liabilities of \$62,874.41 allocable to the Debtors, from the Petition Date through July 13, 2010, for a total administrative expense claim through July 13, 2010 of \$126,738.21 (collectively, the "Allen Concrete Administrative Expense Claim"). Attached hereto as Exhibit A is account detail supporting calculation of the Allen Concrete Administrative Expense Claim.¹

RESERVATION OF RIGHTS

6. Allen Concrete and ACP reserve all rights to further supplement and modify the Request and this Supplement to Request, to object to any assignment of the Partnership Agreement, and to file subsequent requests for payment of administrative expense claims for any

¹ Claimants have also filed proofs of claim to evidence the administrative obligations.

additional amounts determined as owing through July 13, 2010 and for the period from and after July 14, 2010.

WHEREFORE, Claimants respectfully request that the Court accept this Supplement to Request and enter an order (a) allowing an administrative expense claim in the amount of \$126,738.21 for the Debtors' obligations to Allen Concrete and ACP through July 13, 2010 and providing all other relief as sought pursuant to the Request, and (b) otherwise providing Claimants with all other just and proper relief.

Dated: August 10, 2010

Respectfully submitted,

/s/Michael P. Shuster

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2010, a copy of the foregoing *Supplement to Request of Allen Concrete & Masonry, Inc. and Allen Concrete Pumping for Allowance and Payment of Administrative Expense Claim [Docket No. 427]* was filed electronically. Notice of this filing will be sent by operation of this Court's electronic filing system to all parties indicated on the electronic filing receipt. Any other parties requiring service will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Michael P. Shuster
One of the Attorneys for Allen Concrete & Masonry, Inc. and Allen Concrete Pumping

Allen Concrete & Masonry, Inc.
 Allen Concrete Pumping
 Admin Expense Claim Schedule
 3-1-10 Through 7-13-10

Description	Total Due	Partner Split	Due Per Partner
Net Loan Due 3-1-10 through 7-13-10	127,727.59	50%	63,863.80
Accounts Payable	114,996.49	50%	57,498.25
Accrued Property Taxes	10,489.45	50%	5,244.73
Accrued Payroll Taxes	262.88	50%	131.44
Admin Expense Claim Amount 3-1-10 through 7-13-10	253,476.41	50%	126,738.21

EXHIBIT A

Allen Concrete & Masonry, Inc.
 Allen Concrete Pumping
 Claim Schedule
 3-1-10 Through 7-13-10

Net Loan Due to Partner (ACP) 3-1-10 through 7-13-10	127,727.59
Includes: \$3,783.94 of Interest on Loan (10%)	
Accrued Property Taxes	10,489.45
Accrued Payroll Taxes	262.88
Accounts Payable	
Includes:	
Schwab (Insurance 09-10)	30,492.00
PorterWright (Legal)	12,586.56
Grant Fridkin ((Legal)	1,760.75
TCF Financing (Debt Service)	52,093.42
Westfield (Insurance)	16,853.36
Bridgefield (Insurance)	1,069.90
Cintas(Uniforms)	61.00
Dorias (R&M)	79.50
Total Accounts Payable	114,996.49
Total Claim 3-01-10 Through 7-31-10	253,476.41

Allen Concrete Pumping
 Intercompany Loan Due to Allen Concrcte & Masonry, Inc.
 3-1-10 Through 7-13-10

Description	Actual			
	3/1/2010 thru 7/13/10			
		ACP for ACM	ACM for ACP	End Balance
ACP Uniforms for ACM	-	174.92		
ACP Wages for ACM		17,524.78		
ACP Burden for ACM		5,432.69		
ACM Postage by ACP		501.30		
ACM Wages for ACP by ACM			11,882.37	
ACM Burden for ACP by ACM			3,549.25	
ACP Office & Yard Rent			5,260.26	
ACP Mobile Phone Charges by ACM			537.16	
ACP Employee Dental by ACM			625.03	
ACP Employee Health by ACM			11,019.85	
ACP Employee 401K by ACM			1,065.50	
ACP SUTA by ACM			154.65	
ACP Legal by ACM			3,541.75	
ACP Allocated ACM OH Expenses			29,947.50	
ACP Fuel by ACM			14,495.95	
ACP Loan Int by ACM			3,783.94	
Inter Co. Debt & Op Cash Funding Transfers		25,006.00	88,750.00	
ACP Equip & Supplies by ACM			1,754.07	
Total		48,639.69	176,367.28	127,727.59
Balance Due from ACP				127,727.59