

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

IN RE:

**PICCADILLY RESTAURANTS, LLC,
ET AL.,**

DEBTORS

* **CASE NO. 12-51127**
*
* **(JOINT ADMINISTRATION)¹**
*
* **CHAPTER 11**
*
* **JUDGE ROBERT SUMMERHAYS**

DEBTORS' MOTION FOR EXPEDITED HEARING

NOW INTO COURT, through undersigned counsel, come the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"),² and move the Court, for an expedited hearing (this "Motion for an Expedited Hearing") on the *Motion for (I) Final Order Approving and Authorizing the Debtor's Execution of the Master Agreement Governing the Restructuring of Certain Master Leases with Circus Property I, LLC and Circus Property II, LLC, (II) Subject to the Conditions Contained Therein Being Satisfied, Approving and Authorizing the Execution of All Documents Contemplated in the Master Agreement, and the Implementation of the Transactions Contemplated Therein, (III) Subject to and Effective as of the Closing of the Transactions Contemplated in the Master Agreement, Authorizing and Approving the Assumption of the Circus I Lease, as Amended, and the Rejection of the Circus II Lease, as Amended, and (IV) Granting Related Relief* (the "Circus Motion") (Docket #1001). In support of the Motion for an Expedited Hearing, the Debtors represent that both counsel for Atalaya Administrative, LLC and the Unsecured Creditors' Committee have no objection to the setting of

¹ Jointly administered with *In re Piccadilly Food Service, LLC*, 12-51128 (Bankr. W.D. La. 2012), and *In re Piccadilly Investments, LLC*, 12-51129 (Bankr. W.D. La. 2012).

² The debtors in these Chapter 11 cases include Piccadilly Restaurants, LLC, Piccadilly Food Service, LLC, and Piccadilly Investments, LLC.

the Circus Motion at this Court's hearing on August 20, 2013, at 10:00 a.m. Additionally, time is of the essence because the current deadline to assume or reject the master leases at issue in the Circus Motion is August 31, 2013, and (pursuant to the Master Agreement attached to the Circus Motion) an order granting the relief requested in the Circus Motion must be entered so that Proposed Transaction can close August 31, 2013. Additionally, even if another assumption deadline is granted, the Debtors would be forced to incur another month's rent under the master lease that it intends to reject.

NOTICE

Notice of this Motion to Expedite Hearing has been given to (a) the secured lenders and DIP Lenders, through Atalaya Administrative, LLC and its counsel of record, Brent R. McIlwain and David F. Waguespack, (b) the thirty (30) largest unsecured creditors, the identity of which may be amended from time to time, (c) the twenty (20) additional random unsecured creditors, (d) all parties who have requested special notice pursuant to Bankruptcy Rule 2002, (e) the Committee's counsel, and (f) the Office of the United States Trustee. The Debtors submit that no further notice is necessary for this Court to enter an Order granting the relief requested by the Motion for Expedited Hearing.

WHEREFORE, the Debtors pray that this Court grant their Motion for Expedited be granted.

Respectfully submitted,

/s/ Elizabeth J. Futrell

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