

**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**

**PLAN PROPONENTS' JOINT MOTION FOR ENTRY OF AN ORDER APPROVING
(I) THE DISCLOSURE STATEMENT, AND (II) WITH RESPECT TO THE JOINT
REORGANIZATION PLAN, (A) THE CONFIRMATION HEARING NOTICE, THE
MANNER OF MAILING AND SERVICE OF THE SOLICITATION PACKAGE AND
NOTICE TO NON-VOTING CLASSES, (B) THE PROCEDURES FOR VOTING AND
TABULATION OF BALLOTS, (C) THE FORMS OF BALLOTS, AND (D) THE
PROCEDURES FOR ALLOWING CLAIMS FOR VOTING PURPOSES**

NOW INTO COURT, through undersigned counsel, come Atalaya Administrative, LLC, Atalaya Funding II, LP, Atalaya Special Opportunities Fund IV, LP (Tranche B), and Atalaya Special Opportunities Fund (Cayman) IV LP (Tranche B) (collectively, "Atalaya") and the Official Committee of Unsecured Creditors (the "Committee," and together with Atalaya, the "Plan Proponents") in the above-captioned chapter 11 cases of Piccadilly Restaurants, LLC and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"),² and file this joint motion (the "Motion")³ requesting entry of an Order, pursuant to sections 105, 1125 and 1126 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code") and Rules

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.

³ Capitalized but undefined terms herein shall have the meaning as ascribed to them in the Joint Plan (as defined below), as amended, supplemented or modified from time to time.

2002, 3017 and 3018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Approving (I) the Disclosure Statement, and (II) with respect to the Joint Chapter 11 Plan of Piccadilly Restaurants, LLC, Piccadilly Food Service, LLC, and Piccadilly Investments, LLC jointly proposed by the Plan Proponents, (A) the Confirmation Hearing Notice (as defined herein), the Contents of the Solicitation Package (as defined herein), and the Manner of Mailing and Service of the Solicitation Package and Notice to Non-Voting Classes, (B) the Procedures for Voting and Tabulation of Ballots, (C) the Forms of Ballots, and (D) the Procedures for Allowing Claims for Voting Purposes. In support of this Motion, the Plan Proponents respectfully represent as follows:

JURISDICTION

1. The Bankruptcy Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this proceeding pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2).
2. The authority for the relief requested herein are sections 105 and 1126 of the Bankruptcy Code and Bankruptcy Rules 2002, 3017 and 3018.

BACKGROUND

3. On September 11, 2012 (the “Petition Date”), the Debtors Filed for relief under Chapter 11 of the Bankruptcy Code. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
4. On October 23, 2012, the office of the United States Trustee appointed the Committee.

5. On September 27, 2013, the Plan Proponents Filed a Joint Chapter 11 Plan of Piccadilly Restaurants, LLC, Piccadilly Food Service, LLC, and Piccadilly Investments, LLC (the “Joint Plan”) (Docket No. 1123). On the same day, the Disclosure Statement for the Joint Plan was Filed (the “Disclosure Statement”) (Docket No. 1124).

6. Under the Joint Plan, the Holders of Claims and Interests in the following Classes are Impaired and are entitled to vote to accept or reject the Joint Plan (collectively, the “Voting Classes under the Joint Plan”): PR Class 2 (Atalaya Secured Claim); PR Class 4 (Convenience Claims); PR Class 5 (General Unsecured Claims); PR Class 7 (Unliquidated Tort Claims); PFS Class 2 (Atalaya Secured Claim); PFS Class 5 (General Unsecured Claims); PI Class 2 (Atalaya Secured Claim); and PI Class 5 (General Unsecured Claims).

7. Under the Joint Plan, the Holders of Claims in the following Classes are not entitled to vote on the Joint Plan (collectively, the “Non-Voting Classes”): PR Class 1 (Other Priority Claims); PR Class 3 (Other Secured Claims); PR Class 6 (Legacy Workers’ Compensation Claims); PR Class 8 (Interests); PFS Class 1 (Other Priority Claims); PFS Class 1 (Other Priority Claims); PFS Class 3 (Other Secured Claims); PFS Class 8 (Interests); PI Class 1 (Other Priority Claims); PI Class 3 (Other Secured Claims); and PI Class 8 (Interests).

RELIEF REQUESTED

8. In connection with the confirmation process, the Plan Proponents hereby request entry of an Order approving, with respect to the Joint Plan, the following: (a) a Confirmation Hearing Notice, the contents of the Solicitation Package, including a notice for the Holders in the Non-Voting Classes, and the manner of mailing and service of the Solicitation Package and notice to Non-Voting Classes, (b) the procedures for voting and tabulation of Ballots; (c) the forms of Ballots; and (d) the procedures for allowing Claims for voting purposes.

I.

CONFIRMATION HEARING NOTICE, THE CONTENTS OF THE SOLICITATION PACKAGE AND NOTICE TO NON-VOTING CLASSES, MANNER OF MAILING AND SERVICE OF SOLICITATION PACKAGE OR NOTICE TO NON-VOTING CLASSES

(a) Approval of Confirmation Hearing Notice

9. The Plan Proponents propose that a hearing to consider Confirmation of the Joint Plan be scheduled on a date and time convenient to the Bankruptcy Court and that is consistent with the time required for printing and distributing all Joint Plan materials and allowing sufficient time for balloting and Filing objections to the Joint Plan (such date, the “Confirmation Hearing Date”).

10. The Plan Proponents propose that the confirmation hearing notice attached hereto as **Exhibit 1** (the “Confirmation Hearing Notice”) will govern the procedures and deadlines for objecting to Confirmation of the Joint Plan. Specifically, the Plan Proponents propose that the last date for Filing written objections to Confirmation be at least eight (8) days before the Confirmation Hearing Date (the “Objection Deadline”). The Objection Deadline will occur at least twenty-eight (28) days after the service of the Confirmation Hearing Notice, in compliance with the notice requirement of Bankruptcy Rules 2002(b) and (d) and 3017(d), Bankruptcy Rule 3020(b)(1), and the solicitation procedures that are proposed in this Motion.

11. The Plan Proponents further submit that any objection to Confirmation of the Joint Plan (a) be in writing, (b) state the name and address of the objecting party and the nature of the Claim or Interest of such party, (c) state with particularity the basis and nature of any objection, and (d) be Filed in the Docket of the Bankruptcy Case on or before the Objection Deadline. The Plan Proponents propose that the Bankruptcy Court only consider timely Filed written objections, and that any objections not timely Filed in accordance with the provisions of this Motion should be deemed waived.

12. For the above and foregoing reasons, the Plan Proponents request that the Bankruptcy Court approve the Confirmation Hearing Notice (Exhibit 1).

(b) Contents of Solicitation Package for Joint Plan

13. The Plan Proponents propose that that the solicitation package (collectively, the “Solicitation Package”) consist of the following:

- (a) The Disclosure Statement as approved by this Bankruptcy Court, with a copy of the Joint Plan and related exhibits attached as exhibits thereto;
- (b) The Confirmation Hearing Notice (attached as Exhibit 1);
- (c) One or more appropriate Ballots for the Holders of Claims in the Voting Classes under the Joint Plan, together with voting instructions and information relative to the return the Ballots (attached as Exhibit 4); and
- (d) Any other material ordered by this Bankruptcy Court to be included in the foregoing package.

The Plan Proponents propose serving the Solicitation Package on the Holders of Claims in Voting Classes; *provided, however*, because the deadline for filing Proofs of Claim was March 15, 2013 (the “Bar Date”) (Docket No. 477), the Solicitation Package will not be served on any Holder with respect to a Claim that is listed on the Debtors’ Schedules of Assets of Liabilities (Docket No. 269) (the “Schedules”) as being contingent, disputed, or unliquidated (a “Disputed Scheduled Claim”) unless (a) a Proof of Claim was Filed with respect to such Disputed Scheduled Claim before the Bar Date, or (b) a Proof of Claim was deemed timely Filed by an order of the Bankruptcy Court before the Voting Deadline. Further, the Plan Proponents will not serve the Solicitation Package on the Holders of Claims and Interests in the Non-Voting Classes. Instead, in lieu of the Solicitation Package, the Holders of Claims and Interests in the Non-Voting Classes will be served with a Notice of (I) Approval of the Disclosure Statement, (II) Non-Voting Status for the Joint Chapter 11 Plan of Reorganization, and (III) Hearing to

Consider Confirmation of Joint Plan of Reorganization (the “Notice to Non-Voting Classes”), in the form attached to this Motion as **Exhibit 2**. The Notice to Non-Voting Classes includes information on the manner in which to obtain the Solicitation Package, if desired, and notice of the Confirmation Hearing and Objection Deadline.

(c) Mailing and Service of the Solicitation Package and the Confirmation Notice

14. Bankruptcy Rule 2002(b) provides, in relevant part:

Except as provided in subdivision (1) of this rule, the clerk, or some other person as the Bankruptcy Court may direct shall give the debtor, the trustee, all creditors and indenture trustees not less than 28 days’ notice by mail of . . . (2) the time fixed for filing objections and the hearing to consider confirmation of . . . a . . . chapter 11 . . . Plan.

Fed. R. Bankr. P. 2002(b). Bankruptcy Rule 2002(d) provides, in relevant part:

In a chapter 11 reorganization case, unless otherwise ordered by the Bankruptcy Court, clerk, or some other person as the Bankruptcy Court may direct, shall in the manner and form directed by the court give notice to all equity security holders of . . . (6) the time fixed for filing objections to and the hearing to consider confirmation of a plan.

Fed. R. Bankr. P. 2002(d).

15. Bankruptcy Rule 3017(d), (e) and (f) provide:

(d) Transmission and Notice to United States Trustee, Creditors, and equity security holders. Upon approval of the disclosure statement --except to the extent that the court orders otherwise with respect to one or more unimpaired classes of creditors or equity security holders - the debtor in possession, trustee, proponent of the plan, or clerk as the court orders shall mail to all creditors and equity security holders, and in a chapter 11 reorganization case shall transmit to the United States trustee:

- (1) the plan or a court approved summary of the plan;
- (2) the disclosure statement approved by the court;
- (3) notice of the time within which acceptances and rejections of the plan may be filed; and

- (4) any other information as the court may direct, including any court opinion approving the disclosure statement or a court approved summary of that opinion.

In addition, notice of the time fixed for filing objections and the hearing on confirmation shall be mailed to all creditors and equity security holders in accordance with Rule 2002(b), and a form of ballot conforming to the appropriate Official Form shall be mailed to creditors and equity security holders entitled to vote on the plan. If the court opinion is not transmitted or only a summary of the plan is transmitted, the court opinion or the plan shall be provided on request of a party in interest at the plan proponent's expense. If the court orders that the disclosure statement and the plan or a summary of the plan shall not be mailed to any unimpaired class, notice that the class is designated in the plan as unimpaired and notice of the name and address of the person from whom the plan or summary of the plan and disclosure statement may be obtained upon request and at the plan proponent's expense, shall be mailed to members of the unimpaired class together with the notice of the time fixed for filing objections to and the hearing on confirmation. For the purposes of this subdivision, creditors and equity security holders shall include holders of stock, bonds, debentures, notes, and other securities of record on the date the order approving the disclosure statement is entered or another date fixed by the court, for cause, after notice and a hearing.

(e) Transmission to Beneficial Holders of Securities. At the hearing held pursuant to subdivision (1) of this rule, the court shall consider the procedures for transmitting the documents and information required by subdivision (d) of this rule to beneficial holders of stock, bonds, debentures, notes, and other securities, determine the adequacy of the procedures and enter any orders the court deems appropriate

(f) Notice and Transmission of Documents to Entities Subject to an Injunction Under a Plan. If a plan provides for an injunction against conduct not otherwise enjoined under the Code and an entity that would be subject to the injunction is not a creditor or equity security holder, at the hearing held under Rule 3017(a), the court shall consider procedures for providing the entity with:

- (1) at least 28 days' notice of the time fixed for filing objections and the hearing on confirmation of the plan containing the information described in Rule 2002(c)(3); and

(2) to the extent feasible, a copy of the plan and disclosure statement.

Fed. R. Bankr. P. 3017(d) – (f).

16. The Plan Proponents first request that this Bankruptcy Court enter a “record date” for determining the Holders of Claims who are entitled to receive a Solicitation Package and to vote on the Joint Plan (“Voting Record Date”), in accordance with Bankruptcy Rule 3017(d). Due to the number of Holders of Claims and Interests, it is appropriate to set a Voting Record Date so that the BMC Group, Inc., the Voting Agent herein (the “Voting Agent”),⁴ can determine who is entitled to vote. The Plan Proponents request that the Voting Record Date should be the close of business on the date the Order approving the adequacy of the Disclosure Statement is entered on the Docket.

17. The Plan Proponents further propose that the following procedures be followed to provide an effective distribution of the Solicitation Package in compliance with Rules 2002(b) and 3017(d):

- (a) No later than ten (10) Business Days after entry of an Order approving the Disclosure Statement, the Voting Agent shall transmit to the United States mail service, postage pre-paid, true and correct copies of the Solicitation Package to each Holder in a Voting Class that (i) Filed a Proof of Claim, or (ii) holds a Claim that is listed on the Schedules (excluding any Disputed Scheduled Claim unless a Proof of Claim was Filed with respect to such Disputed Scheduled Claim before the Bar Date, or a Proof of Claim was deemed timely Filed by an order of the Bankruptcy Court before the Voting Record Date) (collectively, the “Solicitation Package Recipients”).
- (b) No Later than ten (10) Business Days after entry of an Order approving the Disclosure Statement, the Voting Agent shall transmit to the United States mail service, postage pre-paid, the Notice to Non-Voting Classes (attached hereto as

⁴ BMC Group, Inc. was retained by the Debtors pursuant to an Order entered on October 24, 2012 (Docket No. 244). Pursuant to that Order, and the Agreement for Services attached to the Motion for Authority (Docket No. 204) as Exhibit A, BMC Group, Inc. has been retained to perform the services of the Voting Agent as described in this Motion. In addition, the Debtors have authorized BMC Group, Inc. to serve as the Voting Agent for the Joint Plan.

Exhibit 2) that is addressed to (i) each Holder of a Claim in the Non-Voting Classes, and (ii) the Holders of Interests in the Non-Voting Classes.

- (c) Thereafter, any requests for Solicitation Packages shall be made to the Voting Agent, and the Voting Agent shall be responsible for the mailing of the same.

II.

PROCEDURES FOR VOTING AND TABULATION OF VOTES

(a) Procedures for Voting (the “Voting Procedures”)

18. Bankruptcy Rule 3017(c) provides that, on or before the approval of a disclosure statement, the Bankruptcy Court shall fix a time within which the Holders of Claims and Interests may accept or reject the Joint Plan. *See* Fed. R. Bankr. P. 3017(c). The Plan Proponents intend to cause the Voting Agent to transmit the Solicitation Packages no later than ten (10) Business Days after approval of the Disclosure Statement (the date on which the Solicitation Packages are distributed is the “Transmission Date”). Based on compliance with this schedule, the Plan Proponents propose that, to be counted, Ballots must be properly executed, completed and delivered in paper form to the Voting Agent so as to be received no later than 5:00 p.m., prevailing Central Time, on a day which is at least twenty-nine (29) days after the Transmission Date (the “Voting Deadline”).

19. Completed Ballots are to be sent to the Voting Agent at one of the following addresses so as to be received by **5:00 p. m. Prevailing Central Time** on the Voting Deadline:

By U.S. Mail:	By Delivery or Courier:
PICCADILLY VOTING AGENT Attn: Piccadilly Restaurants, LLC Ballot Processing PO Box 3020 Chanhassen, MN 55317-3020	BMC Group, Inc. Attn: Piccadilly Restaurants, LLC Ballot Processing 18675 Lake Drive East Chanhassen, MN 55317

The Voting Agent will date all Ballots when it receives them.

20. Regardless of which method set forth above is used to submit a Ballot, it must be received no later than the Voting Deadline. No Ballot received by facsimile, by e-mail, or after the Voting Deadline will be counted unless otherwise accepted and disclosed by the Plan Proponents or ordered by the Bankruptcy Court.

(b) Tabulation of Ballots

21. The Plan Proponents request that the following rules shall be applied by the Voting Agent in the tabulation of Ballots with respect to the Joint Plan:

(a) No Ballot received by facsimile, by e-mail, or after the Voting Deadline will be counted unless otherwise accepted and disclosed by the Plan Proponents to the party submitting the Ballot or ordered by the Bankruptcy Court.

(b) With respect to timely received Ballots, unless the foregoing deficiency(ies) is (are) waived, in writing, by the Plan Proponents:

(i) A Ballot containing a signature, but no designation of acceptance or rejection of the Joint Plan, shall not be counted.

(ii) A Ballot containing a signature that both accepts and rejects the Joint Plan for the same Holder shall not be counted.

(iii) A Ballot containing a signature that attempts to partially reject and partially accept the Joint Plan shall not be counted.

(iv) A Ballot containing no signature, but a designation of acceptance or rejection of the Joint Plan, shall not be counted.

(v) If two or more properly executed Ballots are timely submitted with respect to the same Claim, the last timely submitted Ballot with respect to such Claim shall govern.

(vi) Any Holder or authorized counsel for a Holder in a Voting Class who has delivered a valid Ballot to the Voting Agent may withdraw his or her vote by delivering written notice of withdrawal to the Voting Agent. To be valid, the notice of withdrawal must (a) be signed by the party who signed the Ballot to be revoked, and (b) be received by the Voting Agent before the Voting Deadline. Parties in interest retain their rights to contest the validity of any withdrawals of Ballots.

(vii) Any Holder or authorized counsel of a Holder who has delivered a valid Ballot to the Voting Agent may change the vote by delivering to the

Voting Agent a properly executed completed replacement Ballot, so as to be received on or before the Voting Deadline; provided, however, that if any Holder or authorized counsel of a Holder timely delivers to the Voting Agent a properly executed completed replacement Ballot, only the replacement Ballot shall be counted.

22. The Voting Agent shall review all Ballots as they are received to determine their compliance with the above-described rules. If the Voting Agent determines that a Ballot does not comply with the rules and, therefore, will not be counted, the Voting Agent may, but is not required to, notify the party that submitted the Ballot of the problem to advise that a replacement Ballot may be submitted; *provided, however*, that no replacement Ballot submitted after the Voting Deadline shall be considered unless ordered by the Bankruptcy Court, or agreed to in writing by counsel to the Plan Proponents.

III. **APPROVAL OF BALLOT FORMS**

23. Bankruptcy Rule 3017(4) requires the proponents of the Joint Plan to mail a form of the ballot, which substantially conforms to Official Form No. 14, only to “creditors and equity security holders entitled to vote on the plan.”

24. The Proponents propose the following Ballots:

- (a) **Ballot PR 2:** Ballot for the Holders of the PR Class 2 Claim (Atalaya Secured Claim against Piccadilly Restaurants, LLC);
- (b) **Ballot PR 4:** Ballot for Holders of PR Class 4 Claims (Convenience Claims against Piccadilly Restaurants, LLC);
- (c) **Ballot PR 5:** Ballot for the Holders Class PR 5 Claims (General Unsecured Claims against Piccadilly Restaurant, LLC);
- (d) **Ballot PR 7:** Ballot for the Holder Class PR 7 Claims (Unliquidated Tort Claims against Piccadilly Restaurant, LLC);
- (e) **Ballot PFS 2:** Ballot for the Holders of the PFS Class 2 Claim (Atalaya Secured Claim against Piccadilly Food Services, LLC);

(f) **Ballot PFS 5:** Ballot for the Holders PFS Class 5 Claims (General Unsecured Claims against Piccadilly Food Services, LLC);

(g) **Ballot PI 2:** Ballot for the Holders of the PI Class 2 Claim (Atalaya Secured Claim against Piccadilly Investments, LLC); and

(h) **Ballot PI 5:** Ballot for Holders of PI Class 5 Claims (General Unsecured Claims against Piccadilly Investments, LLC).

IV.

THE PROCEDURE FOR ALLOWING CLAIMS FOR VOTING PURPOSES

25. Without prejudice to the rights of the Plan Proponents in any other context, for the purpose of voting, the Plan Proponents propose that the following rules apply with respect to the tabulation of Ballots (collectively, the “Tabulation Rules”):

(a) If a Claim is deemed Allowed in accordance with the Joint Plan, such Claim will be temporarily allowed for voting purposes in the deemed allowed amount set forth in the Joint Plan;

(b) If a Claim for which a Proof of Claim has been timely Filed is marked in the Debtors’ Schedules as contingent or unliquidated, such Claim will be temporarily allowed for voting purposes in the amount of \$1.00;

(c) Proofs of Claim Filed for \$0.00 are not entitled to vote;

(d) If a Claim is listed in the Debtors’ Schedules as contingent, unliquidated or disputed and a Proof of Claim was not (i) Filed by the Bar Date for the filing of Proofs of Claim, or (ii) deemed timely Filed by an order of the Bankruptcy Court prior to the Voting Deadline, such Claim will not be counted for voting purposes, and such a Claim will not be solicited for voting;

(e) If a Claim has been estimated or otherwise allowed for voting purposes by Order of the Bankruptcy Court, such Claim will be temporarily allowed for voting purposes in the amount so estimated or allowed by the Bankruptcy Court;

(f) If the Debtors, the Committee or any other party in interest has Filed and served an objection to a Claim at least ten (10) days before the Voting Deadline, such Claim will be temporarily allowed or disallowed for voting purposes in accordance with the relief sought in the objection; and

(g) If the Holder of a Claim identifies a Claim amount on its Ballot that is less than the amount otherwise calculated in accordance with the Tabulation Rules, the Claim will be temporarily allowed for voting purposes in the lesser amount identified on such Ballot;

provided, for the avoidance of doubt, that only one Ballot may be submitted on account of such Claim.

CONCLUSION

WHEREFORE, the Plan Proponents respectfully request entry of an order, in form and substance substantially similar to the Confirmation Procedures Order attached hereto as **Exhibit 3**, and granting such other relief as may be just and equitable.

Dated: September 30, 2013.

Respectfully submitted,

Greenberg Traurig, LLP

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EXHIBITS TO THE CONFIRMATION PROCEDURES MOTION

- Exhibit 1** Confirmation Hearing Notice
- Exhibit 2** Notice of (I) Approval of the Disclosure Statement, (II) Non-Voting Status For the Joint Chapter 11 Plan of Reorganization and (III) Hearing to Consider Confirmation of Joint Plan of Reorganization
- Exhibit 3** Proposed Confirmation Procedures Order
- Exhibit 4** **BALLOTS**
- Ballot PR 2:** Ballot for the Holders of the PR Class 2 Claim (Atalaya Secured Claim against Piccadilly Restaurants, LLC);
- Ballot PR 4:** Ballot for Holders of PR Class 4 Claims (Convenience Claims against Piccadilly Restaurants, LLC);
- Ballot PR 5:** Ballot for the Holders Class PR 5 Claims (General Unsecured Claims against Piccadilly Restaurant, LLC);
- Ballot PR 7:** Ballot for the Holder Class PR 7 Claims (Unliquidated Tort Claims against Piccadilly Restaurant, LLC);
- Ballot PFS 2:** Ballot for the Holders of the PFS Class 2 Claim (Atalaya Secured Claim against Piccadilly Food Services, LLC);
- Ballot PFS 5:** Ballot for the Holders PFS Class 5 Claims (General Unsecured Claims against Piccadilly Food Services, LLC);
- Ballot PI 2:** Ballot for the Holders of the PI Class 2 Claim (Atalaya Secured Claim against Piccadilly Investments, LLC); and
- Ballot PI 5:** Ballot for Holders of PI Class 5 Claims (General Unsecured Claims against Piccadilly Investments, LLC).