

**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**

MOTION TO WITHDRAW OBJECTIONS TO CERTAIN CLAIMS

NOW INTO COURT, through undersigned counsel, comes the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”),² who file this Motion to Withdraw Objections to Certain Claims (the “Motion to Withdraw”), and in support thereof state as follows:

1. On September 11, 2012, the Debtors filed for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.
2. No trustee or examiner has been appointed. An Official Committee of Unsecured Creditors was appointed in these Chapter 11 Cases on October 23, 2012 (the “Committee”).
3. On February 2, 2014, the Debtors filed five Omnibus Objections to Claims which are relevant to the instant motion - the Debtors’ 12th-16th Omnibus Objections. [Docket Nos. 1383-1387]. Responses to these objections were due March 11, 2014, and, only if timely

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.

responses to the Omnibus Objections were filed, a hearing was to be held on March 18, 2014, regarding such responses. [Docket No. 1407 (Amended Notice of Hearing for Docket Nos. 1383-1389)].

4. The Debtors now wish to withdraw their objections to the following proofs of claim (“POC”), which objections were originally included in the Debtors’ 12th, 14th, 15th, and 16th Omnibus Objections.

- POC No. 39, by Keating of Chicago Inc, listed in Omnibus Objection 12 [Docket No. 1383],
- POC No. 191, by Drew Eckl & Farnham LLP, listed in Omnibus Objection 14 [Docket No. 1385],
- POC Nos. 261 and 268, by Tommy Daniel Upholstery LLC, listed in Omnibus Objection 15 [Docket No. 1386],
- POC No. 410, by Kean Miller LLP, listed in Omnibus Objection 16 [Docket No. 1387], and
- POC No. 387, by Chandlers Parts & Service Inc, listed in Omnibus Objection 16 [Docket No. 1387].

5. Notice of this Motion to Withdraw will be given to (a) the secured lenders, through Atalaya Administrative, LLC and its counsel of record, Brent R. McIlwain and David F. Waguespack, (b) the thirty largest unsecured creditors, the identity of which may be amended from time to time; (c) the twenty additional random unsecured creditors, (d) all parties who have requested special notice pursuant to Bankruptcy Rule 2002, (e) the Committee and its counsel, and (f) the Office of the United States Trustee.

WHEREFORE, the Debtors pray that this Court enter an order similar to the order attached hereto, recognizing the withdrawal of the Debtors’ objections to the proofs of claim listed above, and for all other relief to which they are entitled in law and equity.

/s/ Patrick L. McCune
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* **CASE NO. 12-51127**
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ORDER

Considering the foregoing *Motion to Withdraw Objections to Certain Claims* (Docket #
____) filed by the Debtors;

³ 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).

IT IS ORDERED that Debtors' objections to the following proofs of claim ("POC"), which objections were originally included in Debtors' 12th, 14th, 15th and 16th Omnibus Objections [Docket Nos. 1383, 1385, 1386, and 1387] , are now **WITHDRAWN**.

- POC No. 39, by Keating of Chicago Inc, listed in Omnibus Objection 12 [Docket No. 1383],
- POC No. 191, by Drew Eckl & Farnham LLP, listed in Omnibus Objection 14 [Docket No. 1385],
- POC Nos. 261 and 268, by Tommy Daniel Upholstery LLC, listed in Omnibus Objection 15 [Docket No. 1386],
- POC No. 410, by Kean Miller LLP, listed in Omnibus Objection 16 [Docket No. 1387], and
- POC No. 387, by Chandlers Parts & Service Inc, listed in Omnibus Objection 16 [Docket No. 1387].

SO ORDERED.

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This Order was prepared and is being submitted by:

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