

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

In re:  Piccadilly Restaurants, LLC, <i>et al.</i> ,  Debtors.	Case No. 12-51127  (Joint Administration) <sup>1</sup>  Chapter 11  Judge Robert Summerhays
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**UNOPPOSED EX PARTE MOTION TO CONTINUE HEARING ON THE  
DEBTORS' FOURTEENTH OMNIBUS OBJECTION TO CLAIMS,  
BUT ONLY INsofar AS IT CONCERNS THE PROOFS OF CLAIM  
FILED BY ECOLAB (CLAIM NOS. 228-1 AND 228-2)**

**NOW INTO COURT**, through undersigned proposed counsel, comes Ronald L. Glass, in his capacity as the Administrator (the "Administrator") appointed under the First Amended Chapter 11 Plan for the above-referenced Debtors filed by the Official Committee of Unsecured Creditors and Atalaya Administrative, LLC, *et al.* [Docket No. 1241], confirmed by order of the Court on February 13, 2014 (the "Plan"). The Administrator hereby files this Unopposed Ex Parte Motion to Continue Hearing on the Debtors' Fourteenth Omnibus Objections to Claims, but only insofar as it concerns the Proofs of Claim filed by Ecolab (Claim Nos. 228-1 and 228-2) (the "Motion to Continue"). The Administrator respectfully states as follows:

1. On February 4, 2014, the Debtors filed the Fourteenth Omnibus Objection to Claim [Docket No. 1385] (the "Fourteenth Objection"), which included an objection to proof of claim numbers 228-1 and 228-2 filed by Ecolab, Inc. ("Ecolab").

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<sup>1</sup> Jointly administered with *In re Piccadilly Food Service, LLC*, 12-51128 (Bankr. W.D. La. 2010), and *In re Piccadilly Investments, LLC*, 12-51129 (Bankr. W.D. La. 2010).

2. On March 21, 2014 [Docket No. 1488], the Court entered an Order extending the deadlines for Ecolab to respond to the Debtors' Fourteenth Objection through April 22, 2014. The Court set hearing on these matters, if any such response was timely filed, for April 29, 2014.

3. Pursuant to Article 8.10 of the Plan, the Administrator is charged with administering the claims reconciliation process, and the Plan's Effective Date occurred on April 17, 2014 [Docket No. 1536].

4. In order to permit the Administrator sufficient opportunity to evaluate the Debtors' objections made in the Fourteenth Objection to the claims Ecolab, and to provide the parties with an opportunity to seek consensual resolution of these claims objections, the Administrator hereby requests an extension of Ecolab's response deadline to the Fourteenth Objection, and a continuance of any hearing thereon should such a response be timely filed.

5. The Administrator respectfully requests that the Court enter an order in the form attached hereto as Exhibit "A" providing that Ecolab's deadline to respond to the Fourteenth Objection is May 13, 2014. If and only if a timely response is filed by Ecolab, then the Administrator requests the Court set a hearing on such response for May 20, 2014, at 10:00 a.m. The Administrator and Ecolab have agreed to the extension of these deadlines as requested herein.

WHEREFORE, the Administrator respectfully requests the Court enter an order in the form attached hereto as Exhibit "A," extending Ecolab's deadline to respond to the Fourteenth Objection through May 13, 2014, setting a hearing thereon if and only if any such response is timely filed for May 20, 2014, and granting such other and further relief as the Court deems just, equitable and proper.

Dated: April 22, 2014

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen

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***Proposed Counsel for the Administrator***

**Exhibit "A"**  
**Proposed Order**

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

In re:

Piccadilly Restaurants, LLC, *et al.*,

Debtors.

Case No. 12-51127

(Joint Administration)<sup>2</sup>

Chapter 11

Judge Robert Summerhays

**ORDER**

Considering the *Unopposed Ex Parte Motion to Continue Hearing on the Debtors' Fourteenth Omnibus Objection to Claims, But Only Insofar as it Concerns the Proofs of Claim*

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<sup>2</sup> Jointly administered with *In re Piccadilly Food Service, LLC*, 12-51128 (Bankr. W.D. La. 2010), and *In re Piccadilly Investments, LLC*, 12-51129 (Bankr. W.D. La. 2010).

*filed by Ecolab (Claims Nos. 228-1 and 228-2) [Docket No. 1539] (the “Motion”) filed by Ronald L. Glass, as Administrator (the “Administrator”) under the First Amended Chapter 11 Plan for the above-referenced Debtors confirmed in this Bankruptcy Case (the “Plan”); and*

Whereas, any response of Ecolab, Inc. to the Debtors’ Fourteenth Omnibus Objection to Claims [Docket No. 1385] (the “Fourteenth Objection”) was continued to April 22, 2014 by Order of the Court entered March 21, 2014 [Docket No. 1488], and

Whereas, by the Motion, the Administrator, with Ecolab’s consent, requested an extension of Ecolab’s deadline to respond to the Fourteenth Objection and a continuance of any hearing to be held thereon; and

Whereas, the Court finding good cause to grant the relief set forth herein, it is hereby ORDERED as follows:

1. The Administrator’s Motion is hereby Granted.
2. Ecolab’s deadline to file and serve any response to the Debtors’ objection to Ecolab’s claims set forth in the Fourteenth Objection is hereby extended through and including May 13, 2014.
3. If and only if Ecolab should file and serve a timely response in accordance with this Order, then the Court will hold a hearing on the applicable claim objection and response on May 20, 2014 at 10:00 a.m. in the Courtroom of the United States Bankruptcy Court for the Western District of Louisiana, Lafayette Division, 214 Jefferson Street, Suite 100, Lafayette, Louisiana 70501-7050.

**IT IS SO ORDERED.**

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This order prepared and presented by:

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