

**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 FOR EXPEDITED HEARING

NOW INTO COURT, through undersigned counsel, come the debtors and debtors-in-possession (collectively, the “Debtors”),² who submit this *Motion for Expedited Hearing*, and in support thereof state as follows:

1. On November 30, 2012, the Debtors filed a *Motion for (i) an Increase of the Exclusive Period in Which the Trustee May File a Plan in Order to Maintain the Exclusive Period, (ii) an Increase of the Time in Which Debtors Have Been Ordered to File a Plan, and (iii) an Increase of the Period in Which the Plan Must Be Accepted in Order to Maintain the Exclusive Period* (this “Motion”) (Docket # 351).

2. By that Motion, the Debtors requested that this Court extend by ninety (90) days (a) the date by which they have been ordered to file a plan, and (b) the exclusive period to file a plan. The Debtors further requested that the period in which they have to gain acceptance of a plan also be extended by ninety (90) days.

3. As of now, the Debtors’ exclusive period to file their plan will terminate on January 9, 2013 (the “Exclusivity Deadline”).

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.

4. It is important to decide the Motion as soon as possible because of critical, case-administration issues.

5. The Debtors seek an expedited hearing of the Motion in order to ensure that all orders related to the Motion can be entered before the Exclusivity Deadline. Otherwise, the Debtors could face the expiration of the exclusivity period without adequate preparation and in spite of good faith efforts to advance the case to plan-generation stage.

6. For these reasons, the Debtors respectfully request that the Court grant an expedited hearing of the Motion, setting the same for December 11, 2012, when numerous other matters are set for hearing.

7. The Debtors do not believe that the granting of this Motion will prejudice any party as there are already a number of matters set on that date.

8. Notice of this Motion to Expedite Hearing has been 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'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.

WHEREFORE, the Debtors pray that their *Motion for (i) an Increase of the Exclusive Period in Which the Trustee May File a Plan in Order to Maintain the Exclusive Period, (ii) an Increase of the Time in Which Debtors Have Been Ordered to File a Plan, and (iii) an Increase of the Period in Which the Plan Must Be Accepted in Order to Maintain the Exclusive Period* (Docket # 351) be set for hearing on December 11, 2012, at 10:00 AM in the United States

Bankruptcy Court for the Western District of Louisiana, Lafayette Division, 214 Jefferson Street,
Lafayette, Louisiana 70501, and for all other relief to which they are entitled in law and equity.

Respectfully submitted,

s/ Elizabeth J. Futrell

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