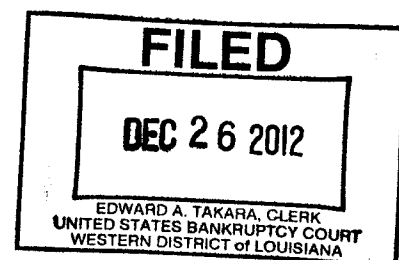


United States Bankruptcy Court
Western District of Louisiana
Lafayette Division



In Re:

**Piccadilly Restaurants,
LLC,
ET AL.,**

Debtors,

Betty Plunk

Movant,

CASE NO. 12-51127

Chapter 11

Judge Robert Summerhays

MOTION TO LIFT AUTOMATIC STAY OF BANKRUPTCY

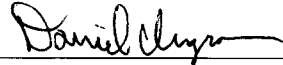
Comes Now, the Movant, BETTY PLUNK, and moves this Honorable Court for an Order lifting the automatic stay of the Court in regard to the bankruptcy petition filed by the Debtors, Piccadilly Restaurants, LLC.

As grounds the Movants would show unto the Court as follows to wit:

1. The Movant is a Plaintiff in a civil action for personal injury sustained in a motor vehicle accident styled Betty Plunk v. Piccadilly Restaurants and Lightman Exeter Village now pending in Shelby County Circuit Court bearing docket number CT-000355-11. This matter is currently stayed by this Court's order.
2. The Movant's submit that counsel for Defendant has represented that sufficient insurance coverage exists to cover this claim and that a claim was initiated with Piccadilly with the claim number 45456. This insurance is sufficient to pay any judgment against or settlement with the debtor in this matter and that recovery will only be against such insurance proceeds and not against the debtor's individually.

3. That this arises from a pre-petition unsecured debt where the Movant was not listed in the bankruptcy petition.

Respectfully submitted,



Daniel Ingram (#29983)

John Michael Bailey Injury Lawyers, P.C.

5978 Knight Arnold Rd., Suite 400

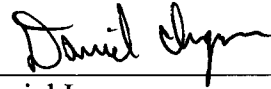
Memphis, TN 38115

901-529-1111

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing pleading has been properly served upon the attorney for all parties or individually this ____ day of _____, 2012, to the following:

Robert R. Stephenson
Wilkins Tipton, P.A.
4735 Old Canton Road, Suite 108
Jackson, MS 39211



Daniel Ingram