

**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**

**DEBTORS' MOTION FOR EXPEDITED HEARING
(Docket ##524, 526, 530 and 532)**

NOW INTO COURT, through undersigned counsel, come the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"),² and move the Court, for an expedited hearing (this "Motion for an Expedited Hearing"), on the following Motions:

1. The Debtors' *Motion for an Order, Pursuant to Section 365 of the Bankruptcy Code, (1) Authorizing the Debtors to Assume Certain Unexpired Leases of Nonresidential Real Property, and (2) Satisfy Cure Amounts in Respect Thereof* (Docket #532);
2. The Debtors' *Second Motion for (i) an Increase of the Exclusive Period in Which the Debtors May File a Plan in Order to Maintain the Exclusive Period, (ii) an increase of the Time in which the 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 #526);

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. The Debtors' *Motion for Authority to (1) Assume the Amended and Restated Employment Agreement, as Modified, with Thomas J. Sandeman, Pursuant to Section 365(a) of the Bankruptcy Code, and (2) Pay Incentive Compensation that Has Been Earned Thereunder, Pursuant to Section 365(a) of the Bankruptcy Code and Local Bankruptcy Rule 2016-2* (Docket #524); and
4. The Debtors' *Motion for Authority to (1) Compromise Workers' Compensation Claim Under Rule 9019, and (2) Pay the Same* (Docket #530).

In support of the Motion for an Expedited Hearing, the Debtors respectfully state that each of the Motions is being filed twenty-two (22) days before the hearing date on March 26, 2013, and the next hearing date is not until April 9, 2013. With respect to two of the foregoing Motions, the deadlines for entry of orders is April 9, 2013. The Debtors respectfully request that the Court grant an expedited hearing of the foregoing Motions.

NOTICE

Notice of this Motion to Expedite Hearing has been given to (a) the secured lenders and DIP Lenders, through Atalaya Administrative, LLC and its counsel of record, Brent R. McIlwain and David F. Waguespack, (b) the thirty (30) largest unsecured creditors, the identity of which may be amended from time to time, (c) the twenty (20) 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 Motions.

WHEREFORE, the Debtors pray that this Court grant their Motion for Expedited be granted.

Respectfully submitted,

s/ Elizabeth J. Futrell

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