UNITED STATES BANKRUPTCY COURT
DISTRICT OF KANSAS AT KANSAS CITY

In re:	)	
	)	
JOHN Q. HAMMONS FALL 2006, LLC, *et al.*,	)	**Case No. 16-21142**
	)	
Debtors.	)	**(Jointly Administered)**
	)	

EMERGENCY MOTION FOR EXPEDITED HEARING ON AMENDED MOTION FOR AUTHORIZATION TO CONTINUE TO USE EXISTING BANK ACCOUNTS, CHECK STOCK, EXISTING BUSINESS FORMS AND CASH MANAGEMENT SYSTEMS AS OF THE COMMENCEMENT DATE

COME NOW, the above-captioned debtors (collectively, the "Debtors") and, pursuant to Fed. R. Bankr. P. 9006 and 9013, hereby request an expedited hearing on the Amended Motion for Authorization to Continue to Use Existing Bank Accounts, Check Stock, Existing Business Forms and Cash Management Systems as of the Commencement Date (the "Amended Cash Management Motion"). In support thereof, the Debtors state the following:

1. On June 26, 2016 (the "Commencement Date"), the Debtors commenced chapter 11 bankruptcy cases by filing their bankruptcy petitions.

2. Since the Commencement Date, the Debtors have continued in possession of their property and control of their operations pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

3. The Court has jurisdiction of this motion pursuant to 28 U.S.C. § 1334(a). This is a core proceeding pursuant to 28 U.S.C. §§ 157(b) in that this motion affects the administration of these bankruptcy cases.

4. In conjunction with the commencement of these bankruptcy cases, the Debtors filed a Motion for Authorization to Continue to Use Existing Bank Accounts, Check Stock, Existing Business Forms, and Cash Management Systems as of the Commencement Date [doc. no. 17] (the "Cash Management Motion").

5. On June 29, 2016, the Court entered an Interim Order Granting Motion for Authorization to Continue to Use Existing Bank Accounts, Check Stock, Existing Business Forms, and Cash Management Systems as of the Commencement Date [doc. no. 47] (the "Interim Order"), authorizing the Debtors to use their current cash management on an interim basis and setting a final hearing on the Cash Management Motion for July 15, 2016 at 9:30 a.m. (the "Final Hearing").

6. After the entry of the Interim Order, the Debtors determined that the Motion did not expressly request (and the Interim Order did not expressly grant) authority for the Debtors to use their existing company credit cards provided by the Debtors to certain employees that are used to purchase goods and services to operate the Debtors' and their non-Debtor affiliates' businesses (the "Company Credit Cards").

7. On July 12, 2016, the Debtors filed the Amended Cash Management Motion, modifying the Cash Management Motion only to add the request to use the Company Credit Cards. There are no other changes to the Cash Management Motion.

8. The Cash Management Motion is up for a continued hearing on July 15, 2016 at 9:30 a.m., and the Debtors request that at the July 15, 2016 hearing, the Court also take up the issues related to the Company Credit Cards.

9. That portion of the Amended Cash Management Motion addressing the Company Credit Cards requests relief critical to the continued and uninterrupted operation of the Debtors' businesses. If the Debtors are unable to use the Company Credit Cards and make payments to the credit card companies, the Debtors' ability to purchase goods and services as needed will be significantly impacted.

10. The Debtors submit that cause exists to shorten the notice and objection deadlines

set forth in the Federal Rules of Bankruptcy Procedure and these Local Rules in order hold an expedited hearing on the Amended Cash Management Motion as it relates to the Company Credit Cards.

WHEREFORE, Debtors respectfully request that this Court enter an Order granting this Motion in full, setting that portion of the Amended Cash Management Motion addressing the Company Credit Cards for an expedited hearing on July 15, 2016 at 9:30 a.m. or as soon thereafter as the Court's schedule permits, and granting any other relief at equity or law this Court deems necessary.

Respectfully submitted,

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