### UNITED STATES BANKRUPTCY COURT DISTRICT OF KANSAS AT KANSAS CITY

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In re : Chapter 11

JOHN Q. HAMMONS FALL 2006, LLC, et al., : Case No. 16-21142 (RDB)

Jointly administered

Debtors,

: Related to Doc. Nos. 1725 & 1755

### **STIPULATION**

WHEREAS, on January 29, 2018, Debtors filed their Motion for Authority to Exceed Budgets Approved under Existing Interim Cash Collateral Order [ECF No. 1725] (the "Motion") and noticed a hearing on the Motion for February 12, 2018 [ECF No. 1726] (the "Hearing");

WHEREAS, the Motion states that Debtors paid \$50,000 to Concord in August 2017 and requests that the Court enter an order authorizing the Debtors to exceed the Cash Collateral Budgets for the purpose of paying an additional \$150,000 to Concord and granting such other and further relief as is just and proper;

WHEREAS, on February 5, 2018, JD Holdings, L.L.C. ("JD Holdings") filed its objection to the Motion [ECF No. 1755] (the "Objection");

WHEREAS, on February 8, 2018, Debtors' counsel confirmed to counsel for JD Holdings that Debtors' counsel will reimburse Debtors' estate for the \$50,000 paid to Concord in August 2017 in the form of an equivalent reduction in the amount due and payable by Debtors to their counsel for legal services rendered in connection with these bankruptcy cases;

WHEREAS, Debtors have requested that JD Holdings agree to postpone the Hearing on the Motion and Objection currently scheduled for February 12, 2018;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED, by the Parties hereto, through their undersigned counsel, as follows:

- The Hearing on the Motion and Objection shall occur on March 12, 2018 at 1:30pm prevailing Central Time, which is the next regularly scheduled omnibus hearing in these bankruptcy cases; and
- 2. This Stipulation shall be filed on the Court's docket prior to February 12, 2018.

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#### AGREED:

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