

**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)**  
 )

**MOTION FOR SHORTENED OBJECTION DEADLINE AND EXPEDITED HEARING  
ON DEBTORS' MOTION FOR AUTHORITY TO ENTER INTO PLAN SUPPORT  
AGREEMENT AND COMPROMISE OF CLAIMS**

NOW COME the above-captioned Debtors, by and through their counsel of record, and hereby request, pursuant to Fed. R. Bankr. P. 9006, 9007 and 9013, a shortened objection deadline and an expedited hearing on the Debtors' Motion for Authority to Enter Into Plan Support Agreement and Compromise of Claims (ECF Doc. 1791) (the "Motion to Compromise"). In support thereof, the Debtors state the following:

1. On June 26, 2016 and July 5, 2016 (the "Commencement Dates") the Debtors commenced chapter 11 bankruptcy cases by filing their bankruptcy petitions.

2. Since the Commencement Dates, the Debtors have continued in possession of their property and control of their operations pursuant to §§ 1107 and 1108 of title 11 of the United States Code (the "Bankruptcy Code").

3. The Court has jurisdiction of this motion pursuant to 28 U.S.C. § 1334(a) and (b). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(A) in that it concerns the administration of the Debtors' estates.

4. On February 13, 2018, the Debtors filed the Motion to Compromise, requesting that the Court approve a compromise by and between the Debtors and JD Holdings, LLC ("JDH") with respect to the proofs of claim filed by JDH in the Debtors' bankruptcy cases and the estimation thereof, JDH's Joint and Consolidated Chapter 11 Plans of Reorganization for All

Debtors (ECF No. 1766) (the "JDH Plan"), and several other contested matters between the parties pending before this Court or at various stages of appeal, as more fully described in the Motion to Compromise (the "Settlement").

5. If approved, the Settlement between the Debtors and JD Holdings will, among other things, facilitate confirmation of the JDH Plan (as modified by the Settlement), and will accelerate the Effective Date of the Plan, which provides for the payment of all allowed claims as set forth therein. As set forth in the Motion to Compromise, the Settlement and, if confirmed, implementation of the JDH Plan (as modified by the Settlement) requires a substantial amount of work to close on the transactions described therein. It is therefore critical that this process begin as soon as possible to minimize any delay in implementation of the settlement and, upon confirmation of the JDH Plan (as modified by the Settlement) payment of all allowed claims as set forth therein.

6. The Debtors therefore request that the Court set the Motion to Compromise for an expedited hearing on February 26, 2018 at 9:30 a.m. central time or soon thereafter as may be heard by the Court. The Debtors also request that the Court set the objection deadline on the Motion to Compromise for February 21, 2018 at 4:00 p.m. central time.

7. Bankruptcy Rule 9006(c)(1) provides that the Court may, in its discretion and for cause shown, shorten a time period proscribed under the Bankruptcy Rules. Based upon the foregoing statements, the Debtors submit that sufficient cause exists to reduce the time proscribed for objecting to and for the hearing on the Motion to Compromise.

WHEREFORE, Debtors respectfully request that this Court enter an Order granting this motion in full, setting the Motion to Compromise for an expedited hearing on February 26, 2018 at 9:30 a.m. central time or soon thereafter as may be heard by the Court; setting the objection

deadline on the Motion to Compromise for February 21, 2018 at 4:00 p.m. central time; and granting such other and further relief as is just and proper.

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