



SIGNED this 16th day of February, 2018.

Robert D. Berger United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF KANSAS AT KANSAS CITY

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In re

Case No. 16-21142 (RDB)

JOHN Q. HAMMONS FALL 2006, LLC, et al.,

Jointly administered

Chapter 11

Debtors.

Related to Doc. Nos. 120, 1461, 1570,

1731, 1728 & 1738

STIPULATION AND ORDER ON ESTIMATION PROCEEDING DEADLINES

WHEREAS, on July 12, 2016, the Court entered the Order Approving Case Management Procedures (A) Limiting Notice of Applications, Motions, Notices and Other Pleadings, and (B) Establishing a Regular Recurring Omnibus Hearing Date for Non-Evidentiary Matters, and Granting Related Relief [ECF No. 120];

WHEREAS, on August 30, 2017 Debtors filed their Omnibus Objection to Proofs of Claims Filed by JD Holdings, L.L.C. and Certain of its Affiliates [ECF No. 1251] (the

"Objection") and on October 3, 2017 JDH and certain affiliates filed their response to the Objection [ECF No. 1345];

WHEREAS, on October 13, 2017, the Court entered its Order Granting, in Part, Debtors' Motion to Estimate Claims and Establish Procedures for the Estimation Process [ECF No. 1377], ("Estimation Proceeding");

WHEREAS, on November 17, 2017, the Court entered the Scheduling and Procedural Order Governing Discovery and Hearing of Claims Estimation and Objections [ECF No. 1461] ("Scheduling Order");

WHEREAS, on December 12, 2017, the Court entered the Order Extending Scheduling Order Deadlines [ECF No. 1570];

WHEREAS, the Scheduling Order provides that certain deadlines and dates relevant to the Estimation Proceeding may be amended only by order of the Court;

WHEREAS, on February 6, 2018, Creditor JD Holdings, L.L.C. ("JD Holdings") filed its Joint and Consolidated Chapter 11 Plans of Reorganization for All Debtors [ECF No. 1766] ("JD Holdings' Plan");

WHEREAS, JD Holdings and Debtors have negotiated a resolution of outstanding issues, which they anticipate will lead to a fully consensual confirmation process on JD Holdings' Proposed Plan of Reorganization (the "Plan") in the bankruptcy court;

WHEREAS, JD Holdings and Debtors believe that in the interim, suspension of certain deadlines regarding the Estimation Proceeding will facilitate those efforts and conserve party and judicial resources;

NOW, THEREFORE, the parties hereto, through their undersigned counsel, agree, and request that the Court order the following relief:

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- The Estimation Proceeding, including all pending matters governed by the Scheduling Order, is stayed, and all deadlines in the Scheduling Order are held in abeyance, while the Plan is pending before the Court;
- The time for Debtors to appeal the Order Denying Approval of Debtors' Disclosure Statement is extended to coincide with the confirmation of JD Holdings' Plan.
 IT IS SO ORDERED.

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SUBMITTED AND AGREED BY:

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