

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

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

**MOTION FOR EXPEDITED HEARING ON DEBTORS' MOTION FOR AUTHORITY
TO RENEW LICENSE AGREEMENT WITH HOLIDAY HOSPITALITY
FRANCHISING, LLC**

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, an expedited hearing on the Debtors' Motion for Authority to Renew License Agreement With Holiday Hospitality Franchising, LLC (ECF Doc. 1873) (the "Motion to Renew"). 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 March 9, 2018, the Debtors filed the Motion to Renew, requesting that the Court authorize the Debtors to renew a franchise license agreement for Holiday Inn Express Hotel in Springfield, Missouri. The License Agreement (as defined in the Motion to Renew) expires on April 1, 2018; accordingly, it is critical that the Debtors obtain authority to renew the License

Agreement prior to April 1, 2018.

5. The Debtors therefore request that the Court set the Motion to Renew for an expedited hearing on March 23, 2018 at 9:30 a.m. central time, at which the Court will be considering approval of the disclosure statement filed by JD Holdings, LLC. The Debtors also request that the Court set the objection deadline on the Motion to Renew for March 16, 2018 at 4:00 p.m. central time, which is consistent with objection deadlines established by the Court in the omnibus procedures for this case.

6. 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 the hearing on the Motion to Renew.

WHEREFORE, Debtors respectfully request that this Court enter an Order granting this motion in full, setting the Motion to Renew for an expedited hearing on March 23, 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 Renew for March 16, 2018 at 4:00 p.m. central time; and granting such other and further relief as is just and proper.

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