

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

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In re : Chapter 11
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JOHN Q. HAMMONS FALL 2006, LLC, *et al.*, : Case No. 16-21142 (RDB)
: *Jointly administered*
Debtors, :
: Related to Doc. Nos. 1844 & 1845
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STIPULATION AND PROPOSED ORDER

WHEREAS, on February 27, 2018, the CMBS Lenders¹ filed their Omnibus Objection to Rejection Claims of JD Holdings, L.L.C. [ECF No. 1844] and Omnibus Objection to Breach Claims of JD Holdings, L.L.C. [ECF No. 1845] (collectively, the “CMBS Claim Objections”);

¹ The CMBS Lenders include the following secured creditors: (a) U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Commercial Mortgage Pass-Through Certificates, Series 2006-LDP7, by and through LNR Partners, LLC, solely in its capacity as Special Servicer (holder of the loan known as the “Nomura Portfolio Loan”); (b)

WHEREAS, JD Holdings, L.L.C. (“JD Holdings”), believes that the CMBS Claim Objections are without merit and are otherwise moot, which the CMBS Lenders dispute;

WHEREAS, JD Holdings and the CMBS Lenders have agreed to adjourn any response by JD Holdings to the CMBS Claim Objections until after the Court has ruled upon the Joint and Consolidated Chapter 11 Plans of Reorganization for all Debtors filed by Creditor JD Holdings, as may be amended (the “Plan”).

ACCORDINGLY, IT IS ORDERED THAT:

1. JD Holdings shall have forty-five (45) days from the entry of an order by the Court confirming or denying the Plan to file any response(s) to the CMBS Claim Objections (the “Deadline”). If the Deadline falls on a weekend or holiday, then the Deadline shall become the next business day upon which the Court maintains regular hours; and
2. Nothing in this stipulation shall be construed as an admission that the CMBS Claim Objections are valid or otherwise proper and the parties reserve all rights with respect to the CMBS Claim Objections and any response(s) thereto.

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Wilmington Trust, National Association, as Trustee for the registered holders of Wells Fargo Commercial Mortgage Trust 2015-C26, Commercial Mortgage Pass-Through Certificates, Series 2015-C26 by and through Midland Loan Services, a division of PNC Bank, National Association, solely in its capacity as Special Servicer (holder of the loan known as the “Chateau Lake Loan”); (c) Deutsche Bank Trust Company Americas, as Trustee, on behalf of the Registered Holders of Citigroup Commercial Mortgage Securities, Inc., Commercial Mortgage Pass-Through Certificates, Series 2015-GC33, by and through LNR Partners, LLC, solely in its capacity as Special Servicer (holder of the loan known as the “Goldman Portfolio Loan”); (d) U.S. Bank National Association, as Trustee for the Registered Holders of Banc of America Commercial Mortgage, Inc., Commercial Mortgage Pass-Through Certificates, Series 2007-3, by and through C-III Asset Management LLC, solely in its capacity as Special Servicer (holder of the loan known as the “Euro-Hypo Portfolio Loan”); and (e) Wells Fargo Bank, N.A., as successor to LaSalle Bank National Association, as Trustee for the registered holders of COMM 2006-C8 Commercial Mortgage Pass-Through Certificates, by and through LNR Partners, LLC, solely in its capacity as Special Servicer (holder of the loan known as the “Barclays Portfolio Loan”) (collectively, the “CMBS Lenders”).

SUBMITTED AND AGREED BY:

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