UNITED STATES BANKRUPTCY COURT
DISTRICT OF KANSAS AT KANSAS CITY

In re	:	Chapter 11
JOHN Q. HAMMONS FALL 2006, LLC, *et al.*,	:	Case No. 16-21142 (RDB)
	:	*Jointly administered*
Debtors[1]	:	

MOTION TO SHORTEN OBJECTION DEADLINE AND FOR EXPEDITED HEARING ON JD HOLDINGS, L.L.C'S MOTION TO RECONSIDER, VACATE, AND/OR MODIFY THE ORDER OVERRULING, IN PART, AND GRANTING, IN PART, JOINT OBJECTION TO "CHATEAU LAKE LOAN" CLAIM AND OVERRULING IN PART, AND GRANTING, IN PART, CMBS LENDERS' MOTION TO ALLOW CLAIMS

JD Holdings, L.L.C. ("JD Holdings") hereby submits this motion (the "Motion") pursuant to Rules 9006 and 9013 of the Federal Rules of Bankruptcy Procedure seeking an expedited hearing on JD Hold's Motion to Reconsider, Vacate, and/or Modify the Order Ovverruling, Joint Objection to "Chateau Lake Loan" Claim and Overruling in Part, and Granting, in Part, CMBS Lenders' Motion to Allow Claims (doc. nos. 2795 and 2798) (the "Motion"). In support of this request JD Holdings states as follows:

1. This Court has jurisdiction of this motion pursuant to 28 USC section 1334(a) and (b). This is a core proceeding pursuant to section 157(b)(A) of title 28.

2. On January 3, 2020, this Court entered its Memorandum Opinion and Order Overruling, in Part, and Granting, in Part,Joint Objection to "Chateau Lake Loan" Claim and Overruling in Part, and Granting, in Part, CMBS Lenders' Motion to Allow Claims. (doc. no. 2792).

3. Pertinently, this Order found a default interest rate of 5% over the contractual rate

[1] The debtors in these cases are referred to collectively as the "Debtors" and, as reorganized pursuant to these chapter 11 cases, the "Reorganized Debtors."

was due on the $42,124,649.94 principal balance of the Chateau Lake Loan.

4. This default interest is accruing at a rate in excess of $5,000 per day.

5. The default on which the imposition of this rate was premised was the filing of the above-captioned bankruptcy case.

6. The Motion asks the Court to reconsider its imposition of default interest subsequent to the confirmation of the above-captioned debtors' plan – an issue neither raised nor briefed by any party, but implicitly decided by this Court.

7. JD Holdings is seeking an expedited hearing because of the considerable potential default interest which will be owing should its Motion be unsuccessful.

8. Per the Court's scheduling an administrative orders in this case, hearing on the Motion is currently set for March 23, 2020, with a response to the Motion due March 16 – 64 days after the Motion was filed.

9. JD Holding's Motion has been on file for more than 30 days and all parties in interest have had more than adequate notice of it. It would unduly prejudice no party for this Court to expedite hearing and shorten the objection deadline.

WHEREFORE JD Holdings respectfully requests that this Court enter its order setting hearing on the Motion on the soonest practicable date and setting a deadline to respond to the Motion for a reasonable time prior to the hearing and grant such other and further relief as the Court deems just and equitable.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting Electronic Case Filing (ECF) notification on February 12, 2020.

/s/ victor f weber