EXHIBIT C

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]	:	

JD HOLDINGS L.L.C.'S FIRST SET OF INTERROGATORIES

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure made applicable to this matter by Rules 7033 and 9014 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), and Rule of Practice of the United States District Court for the District of Kansas 33.2, JD Holdings L.L.C. ("JD Holdings") hereby requests that the above captioned debtors ("Debtors" or "you" or "your") answer fully, in writing and under oath, JD Holdings' First Set of Interrogatories (the "Interrogatories" and, each, an

[1] [1] The Debtors in this case are: ACLOST, LLC, Bricktown Residence Catering Co., Inc., Chateau Catering Co., Inc., Chateau Lake, LLC, City Centre Hotel Corp., Civic Center Redevelopment Corp., Concord Golf Catering Co., Inc., Concord Hotel Catering Co., Inc., East Peoria Catering Co., Inc., Fort Smith Catering Co., Inc., Franklin/Crescent Catering Co., Inc., Glendale Coyotes Catering Co., Inc., Glendale Coyotes Hotel Catering Co., Inc., Hammons, Inc., Hammons of Arkansas, LLC, Hammons of Colorado, LLC, Hammons of Franklin, LLC, Hammons of Frisco, LLC, Hammons of Huntsville, LLC, Hammons of Lincoln, LLC, Hammons of New Mexico, LLC, Hammons of Oklahoma City, LLC, Hammons of Richardson, LLC, Hammons of Rogers, Inc., Hammons of Sioux Falls, LLC, Hammons of South Carolina, LLC, Hammons of Tulsa, LLC, Hampton Catering Co., Inc., Hot Springs Catering Co., Inc., Huntsville Catering, LLC, International Catering Co., Inc., John Q. Hammons 2015 Loan Holdings, LLC, John Q. Hammons Center, LLC, John Q. Hammons Fall 2006, LLC, John Q. Hammons Hotels Development, LLC, John Q. Hammons Hotels Management I Corporation, John Q. Hammons Hotels Management II, LP, John Q. Hammons Hotels Management, LLC, Joplin Residence Catering Co., Inc., JQH – Allen Development, LLC, JQH – Concord Development, LLC, JQH – East Peoria Development, LLC, JQH - Ft. Smith Development, LLC, JQH – Glendale AZ Development, LLC, JQH - Kansas City Development, LLC, JQH - La Vista Conference Center Development, LLC, JQH - La Vista CY Development, LLC, JQH - La Vista III Development, LLC, JQH - Lake of the Ozarks Development, LLC , JQH – Murfreesboro Development, LLC, JQH – Normal Development, LLC, JQH – Norman Development, LLC, JQH – Oklahoma City Bricktown Development, LLC, JQH – Olathe Development, LLC, JQH – Pleasant Grove Development, LLC, JQH – Rogers Convention Center Development, LLC, JQH – San Marcos Development, LLC, Junction City Catering Co., Inc., KC Residence Catering Co., Inc., La Vista CY Catering Co., Inc., La Vista ES Catering Co., Inc., Lincoln P Street Catering Co., Inc., Loveland Catering Co., Inc., Manzano Catering Co., Inc., Murfreesboro Catering Co., Inc., Normal Catering Co., Inc., OKC Courtyard Catering Co., Inc., R-2 Operating Co., Inc., Revocable Trust of John Q. Hammons Dated December 28, 1989 as Amended and Restated, Richardson Hammons, LP, Rogers ES Catering Co., Inc., SGF – Courtyard Catering Co., Inc., Sioux Falls Convention/Arena Catering Co., Inc., St Charles Catering Co., Inc., Tulsa/169 Catering Co., Inc., and U.P. Catering Co., Inc.

"Interrogatory") to JD Holdings no later than August 10, 2016, or such other date as the parties may agree or may be set by the Court, at the offices of Milbank, Tweed, Hadley & McCloy LLP, 28 Liberty Street, New York, New York 10005. These Interrogatories are subject to the Definitions and Instructions enumerated below.

DEFINITIONS

Unless otherwise indicated, the following definitions shall be applicable to these Interrogatories:

1. "Bankruptcy Case" refers to the above-captioned bankruptcy proceeding and any related adversary or bankruptcy proceedings.

2. "Charitable Trust" shall have the same meaning as that term is defined in the JQH Trust Agreement.

3. "Debtors," "you," and "your" each means Debtors and any parent, subsidiary, or affiliated companies of any of the Debtors, and any former or present trustees, officers, directors, principals, partners, representatives, agents, attorneys, accountants, employees thereof.

4. "First Day Declaration of Greggory D. Groves" means the Declaration in Support of First Day Motions (Dkt. No. 16) filed in the Bankruptcy Proceeding.

5. "JQH Trust" means debtor the Revocable Trust of John Q. Hammons, dated December 28, 1989, as amended and restated.

6. "JQH Trust Agreement" means the First Restatement of Revocable Trust of John Q. Hammons, as amended or restated.

7. "Marital Trust" shall have the same meaning as that term is defined in the JQH Trust Agreement.

8. "Nomura Loan" has the same meaning as set forth in the First Day Declaration of Greggory D. Groves.

9. "ROFR" means the Sponsor Entity Right of First Refusal dated September 16, 2005.

10. "Special Purpose Debtors" has the meaning set forth in JD Holdings motion to dismiss, filed on July 25, 2016.

11. "Status Quo Order" means the Status Quo Order entered in *JD Holdings L.L.C. et al. v. Dowdy et al*., C.A. No. 7480-VCL, on October 28, 2015.

12. "Successor Trustee" shall have the same meaning as that term is defined in the JQH Trust Agreement.

13. "Trusts" shall mean the JQH Trust, the Charitable Trust, and the Marital Trust collectively.

INSTRUCTIONS

1. In accordance with the Bankruptcy Rules, your response shall set forth the Interrogatory and its answer, with each Interrogatory answered separately and fully in writing and under oath, unless it is objected to, in which event your reasons for objection shall be stated in lieu of an answer. The answers are to be signed by the parties making them, and the objections signed by the attorney making them.

2. The answer to an Interrogatory shall not be supplied by referring to the answer to another Interrogatory unless the answer to the Interrogatory being referred to supplies a complete and accurate answer to the Interrogatory being answered.

3. Information requested in these Interrogatories shall include that within the knowledge or possession of any of Debtors' agents and employees, trustees, principals, directors, officers, representatives, attorneys, investigators, advisors, and any other persons, firms or entities directly or indirectly subject to its control in any way whatsoever, including but not limited to any parent, subsidiary, or affiliated companies.

4. If Debtors withhold any information in response to any of the Interrogatories set forth below on grounds of privilege or pursuant to the work-product doctrine, Debtors must answer the Interrogatory to the extent that it does not claim a privilege.

5. In the event that Debtors object to any Interrogatory on the ground that it is overbroad and/or unduly burdensome for any reason, please respond to that Interrogatory as narrowed to the least extent necessary, in Debtors' judgment, to render it not overbroad/unduly burdensome and state specifically the extent to which Debtors have narrowed that Interrogatory for purposes of their response.

6. In accordance with Fed. R. Bankr. P. 7026, where a claim of privilege is asserted in objecting to any Interrogatory or part thereof:

a. In asserting the privilege, the responding party shall, in the objection, identify with specificity the nature of the privilege that is being claimed;

b. The following information should be provided in the objection, if known or reasonably available, unless divulging such information would cause disclosure of the allegedly privileged information:

i. For oral communications: (i) the name of the person making the communication and the names of the person(s) present while the communication was made, and, where not apparent, the relationship of the persons present to the person making the communication; (ii) the date and place of the communication; and (iii) the general subject matter of the communication;

ii. For documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, where appropriate, the author, addressee, custodian, and any other recipient of the document, and, where not apparent, the relationship of the author, addressee, custodian, and any other recipient to each other

7. Where asked to "identify" or for the "identity" or "identification" of a natural person, state that person's full name, present or last known address, home and business telephone numbers, and present or last known place of employment. When the terms "identify," "identity," or "identification" are used in reference to a person other than a natural person,

describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person" above), and to state that entity's present or last known address, telephone number, and principal place of business. Once any person has been identified properly, it shall be sufficient thereafter when identifying that same person to state the name only.

8. Where asked to "identify" or for the "identity" or "identification" of a document, state, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d).

9. The present tense includes the past and future tenses. The use of the singular form of any word includes the plural and vice. "All," "any," and "each" shall each be construed as encompassing any and all. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatories all responses that might otherwise be construed to be outside of its scope. "Concerning" means relating to, referring to, describing, evidencing or constituting. "Including" means "including but not limited to." "And" and "or" encompasses both "and" and "or." Words in the masculine, feminine or neuter shall include each of the other genders.

10. In accordance with Fed. R. Bankr. P. 7033, if the responding party elects to specify and produce documents in answer to any Interrogatory, the specification shall be in sufficient detail to permit the interrogating party to locate and identify the documents from which the answer may be ascertained, including, but limited to, listing the production identification number (such as a "Bates" number) of each of the documents. Any such documents will be produced at the same time Debtors serve their answers to these Interrogatories.

11. The Interrogatories set forth below shall be deemed to be continuing in accordance with Rule 26(e) of the Federal Rules of Civil Procedure so as to require

supplementation in the event that Debtors obtain or become aware of any additional information or documents responsive to any Interrogatory herein.

INTERROGATORIES

1. Identify all past or present beneficiaries of the Trusts and who designated the beneficiary.

Response No. 1:

2. Identify all distributions made by the Trusts from May 26, 2013 through the present.

Response No. 2:

3. Identify the individuals responsible for drafting the JQH Trust Agreement, and any amendments or restatements thereto.

Response No. 3:

4. Describe the purpose for which the JQH Trust was formed.

Response No. 4:

5. Identify all individuals who had knowledge or were informed of the Debtors' intention to file for bankruptcy prior to June 26, 2016.

Response No. 5:

6. Identify all facts and circumstances that form the basis of the statement in the First Day Declaration of Greggory D. Groves that there was a "substantial risk that the Delaware Chancery Court would enter an order compelling the JQH Entities to transfer

substantially all of their assets to JD and Eilian at a 20% discount from the court-determined market value and to provide Eilian with 22.5% subordinated seller financing."

Response No. 6:

7. Identify all facts and circumstances that form the basis of the statement in the First Day Declaration of Greggory D. Groves that "the[re] are no viable options other than commencing bankruptcy cases to protect against the materially adverse financial results that will be occasioned in the litigation if judgments are rendered against JQH."

Response No. 7:

8. Identify all facts and circumstances that form the basis of the statement in the First Day Declaration of Greggory D. Groves that "[a]s a result of the Status Quo Order and the Delaware Court's comments, the JQH Entities were (and continue to be) unable to refinance certain of their debts on or before their maturity date on reasonable terms . . . ."

Response 8:

9. Identify all facts and circumstances that form the basis of the statement in the First Day Declaration of Greggory D. Groves that "the Status Quo Order directly led to the Nomura Borrowers' default under the Nomura Loan at its maturity."

Response 9:

10. Do you contend that the Trustees of the JQH Trust or the Special Purpose Debtors were able to file bankruptcy petitions for the Special Purpose Debtors without the consent of JD Holdings? If so, identify the facts upon which your contention is based.

Response 10:

11. If you contend that Debtors provided notice to JD Holdings of their intention to file for bankruptcy prior to those filings, identify the facts upon which your contention is based.

Response 11:

12. If you contend that the ROFR can be rejected by Debtors, whether pursuant to 11 U.S.C. § 365 or otherwise, identify the facts upon which your contention is based.

Response 12:

Dated: July 25, 2016
Kansas City, Missouri

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