

ASK FINANCIAL LLP

Joseph L. Steinfeld, Jr., Esq.

(Admitted Pro Hac Vice)

John T. Siegler, Esq.

Kara E. Casteel, Esq.

(Admitted Pro Hac Vice)

2600 Eagan Woods Drive, Suite 400

St. Paul, MN 55121

Telephone: (651) 406-9665 ext. 846 **Fax:** (651) 406-9676

e-mail: kcasteel@askfinancial.com

Attorneys For Plaintiff, KDW Restructuring & Liquidation Services, LLC, Litigation Trustee

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>In re</p> <p>Jennifer Convertibles, Inc., et al.¹,</p> <p style="text-align: right;">Debtors.</p> <hr/> <p>KDW Restructuring & Liquidation Services, LLC, Litigation Trustee for the Jennifer Convertibles Litigation Trust,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>Defendants Listed on <u>Exhibit "A,"</u></p> <p style="text-align: right;">Defendant.</p>	<p>Bk. No. 10-13779-ALG</p> <p>Chapter 11</p> <p>Honorable Allan L. Gropper</p> <p>Adv. No. <u>Refer to Exhibit "A"</u></p>
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**PLAINTIFF'S NOTICE OF MOTION FOR AN ORDER ESTABLISHING
STREAMLINED PROCEDURES GOVERNING ADVERSARY PROCEEDINGS
BROUGHT BY KDW RESTRUCTURING & LIQUIDATION SERVICES, LLC,
LITIGATION TRUSTEE FOR THE JENNIFER COVERTIBLES LITIGATION TRUST
PURSUANT TO SECTIONS 502, 547, 548 AND 550 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE, that on **May 23, 2012**, at 10 a.m. EDT, the undersigned attorneys for plaintiff, KDW Restructuring & Liquidation Services, LLC, the duly appointed litigation trustee for the Jennifer Convertibles Litigation Trust, (the "Plaintiff" or "Trustee"), will move before United States Bankruptcy Judge Allan L. Gropper at the United States Bankruptcy

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: (i) Jennifer Convertibles, Inc. (4646); (ii) Jennifer Convertibles Boylston MA, Inc. (7904); (iii) Jennifer Chicago Ltd. (0505); (iv) Elegant Living Management, Ltd. (5049); (v) Hartsdale Convertibles, Inc. (1681); (vi) Jennifer Management III Corp. (3552); (vii) Jennifer Purchasing Corp. (7319); (viii) Jennifer Management II Corp. (9177); (ix) Jennifer Management V Ltd. (9876); (x) Jennifer Convertibles Natick, Inc. (2227); (xi) Nicole Convertibles, Inc. (5985); (xii) Washington Heights Convertibles, Inc. (0783).

Court, Southern District of New York, One Bowling Green, New York, New York 10004, pursuant to sections 102(1) and 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 7016, 7026 and 9006 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), for an order entry of a procedures order (the “Proposed Procedures Order”), substantially in the form annexed thereto as **Exhibit “B.”**

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, by parties with legal representation shall be filed (a) through the Bankruptcy Court’s electronic filing system in accordance with General Order M-399 (which can be found on www.nybs.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM or other electronic media in portable document format (PDF), Microsoft Word, WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and served upon (i) the chambers of the Honorable Allan L. Gropper One Bowling Green, New York New York 10004, and (ii) ASK Financial, LLP, Counsel for Plaintiff, 2600 Eagan Woods Drive, Suite 400, St. Paul, MN 55121, Attention: Kara E. Casteel, Esq., so as to be received on or before May 16, 2012 .

PLEASE TAKE FURTHER NOTICE that, in the event that no objection to entry of the Proposed Order has been properly filed and served by the Objection Deadline, the Bankruptcy Court may enter the Proposed Order without a hearing.

Dated: April 10, 2012

A·S·K FINANCIAL LLP

By /s/ Kara E. Casteel
Joseph L. Steinfeld, Jr., Esq. (*Admitted Pro Hac Vice*),
John T. Siegler, Esq.
Kara E. Casteel, Esq. (*Admitted Pro Hac Vice*),
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 406-9665 ext. 846 **Fax:** (651) 406-9676
e-mail: kcasteel@askfinancial.com

Attorneys for KDW Restructuring & Liquidation Services,
LLC, Litigation Trustee