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ATTORNEYS FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Chapter 11
	§	
Tuesday Morning Corporation, et al., ¹	§	Case No. 20-31476-HDH-11
	§	
Debtors.	§	Jointly Administered

MOTION FOR EXPEDITED HEARING ON DEBTORS' MOTION UNDER BANKRUPTCY CODE § 1121(d) FOR EXTENSION OF DEBTORS' EXCLUSIVITY PERIOD TO FILE A PLAN AND SOLICIT VOTES IN CONNECTION THEREWITH

Tuesday Morning Corporation and its above-captioned debtor affiliates, as debtors and debtors in possession (collectively, the "<u>Debtors</u>") file this motion requesting a hearing on an expedited basis (the "<u>Motion to Expedite</u>") to consider *Debtors' Motion Under Bankruptcy Code* § 1121(d) for Extension of Debtors' Exclusivity Period to File a Plan and Solicit Votes in Connection Therewith (the "<u>Motion</u>"), and in support of this Motion to Expedite, the Debtors respectfully state as follows:

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Tuesday Morning Corporation (8532) ("<u>TM Corp.</u>"); TMI Holdings, Inc. (6658) ("<u>TMI Holdings</u>"); Tuesday Morning, Inc. (2994) ("<u>TMI</u>"); Friday Morning, LLC (3440) ("<u>FM LLC</u>"); Days of the Week, Inc. (4231) ("<u>DOTW</u>"); Nights of the Week, Inc. (7141) ("<u>NOTW</u>"); and Tuesday Morning Partners, Ltd. (4232) ("<u>TMP</u>"). The location of the Debtors' service address is 6250 LBJ Freeway, Dallas, TX 75240.

1. The Debtors filed the Motion on November 15, 2020. The Debtors request that a hearing on the Motion be set on an expedited basis at any date and time convenient for the Court that is prior to November 23, 2020. The Debtors further request that the Court establish a deadline for parties to object to the Motion that is 12:00 p.m. Central Time on the date prior to the date of the expedited hearing.

2. Expedited consideration of the Motion is requested because it is in the best interest of the Debtors estates and their creditors to approve the relief requested as soon as possible. Expedited consideration of the Motion in advance of November 23, 2020 is requested in order for the Motion to be heard prior to the expiration of the Debtors' Exclusivity Period.

3. Notice of the proposed expedited hearing will be sufficient because all interested parties were served with the Motion via expedited service, and once a hearing on the Motion has been set, the Debtors shall file and cause to be served a Notice of Expedited Hearing via expedited service upon the interested parties.

RESPECTFULLY SUBMITTED this 15th day of November, 2020.

HAYNES AND BOONE, LLP

By: <u>/s/ Ian T. Peck</u> Ian T. Peck State Bar No. 24013306 Jarom J. Yates State Bar No. 24071134 Jordan E. Chavez State Bar No. 24109883 HAYNES AND BOONE, LLP 2323 Victory Avenue, Suite 700 Dallas, TX 75219 Telephone: 214.651.5000 Facsimile: 214.651.5940 Email: ian.peck@haynesboone.com Email: jarom.yates@haynesboone.com

ATTORNEYS FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the Debtors conferred with counsel to the DIP ABL Agent, counsel to the Creditors Committee, and counsel to the Equity Committee prior to filing this Motion to Expedite. The Creditors Committee and Equity Committee indicated they may oppose the relief sought in this Motion to Expedite.

/s/ Jordan E. Chavez

Jordan E. Chavez

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Chapter 11
Tuesday Morning Corporation, et al., ¹	§ 8	Case No. 20-31476-HDH-11
	8	Case 110. 20-514/0-11D11-11
Debtors.	§	Jointly Administered

ORDER GRANTING MOTION FOR EXPEDITED HEARING ON DEBTORS' MOTION UNDER BANKRUPTCY CODE § 1121(d) FOR EXTENSION OF DEBTORS' EXCLUSIVITY PERIOD TO FILE A PLAN AND SOLICIT VOTES IN <u>CONNECTION THEREWITH</u>

The Court has considered the Motion for Expedited Hearing on Debtors' Motion Under

Bankruptcy Code § 1121(d) for Extension of Debtors' Exclusivity Period to File a Plan and Solicit

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Tuesday Morning Corporation (8532) ("<u>TM Corp.</u>"); TMI Holdings, Inc. (6658) ("<u>TMI Holdings</u>"); Tuesday Morning, Inc. (2994) ("<u>TMI</u>"); Friday Morning, LLC (3440) ("<u>FM LLC</u>"); Days of the Week, Inc. (4231) ("<u>DOTW</u>"); Nights of the Week, Inc. (7141) ("<u>NOTW</u>"); and Tuesday Morning Partners, Ltd. (4232) ("<u>TMP</u>"). The location of the Debtors' service address is 6250 LBJ Freeway, Dallas, TX 75240.

Votes in Connection Therewith (the "<u>Motion to Expedite</u>") filed by the Debtors, and finding that good cause exists to grant the relief sought therein,

IT IS HEREBY ORDERED THAT:

- 1. The Motion to Expedite is hereby granted.
- 2. A hearing on the Motion (as defined in the Motion to Expedite) will be held on

______ at _____ Central Time before the Honorable Harlin D. Hale, at the Earl

Cabell Federal Building, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, Texas 75242.

The deadline for filing objections to the Motion shall be ______ at 12:00 pm Central

Time.

3. The Debtors are responsible for filing and serving a Notice of Expedited Hearing.

END OF ORDER

Submitted by:

HAYNES AND BOONE, LLP Ian T. Peck State Bar No. 24013306 Jarom J. Yates State Bar No. 24071134 Jordan E. Chavez State Bar No. 24109883 2323 Victory Avenue, Suite 700 Dallas, TX 75219 Telephone: 214.651.5000 Facsimile: 214.651.5940 Email: ian.peck@haynesboone.com Email: jarom.yates@haynesboone.com

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