

Robert D. Albergotti  
State Bar No. 009790800  
Ian T. Peck  
State Bar No. 24013306  
Jarom J. Yates  
State Bar No. 24071134  
**HAYNES AND BOONE, LLP**  
2323 Victory Avenue, Suite 700  
Dallas, TX 75219  
Telephone: 214.651.5000  
Facsimile: 214.651.5940  
Email: [robert.albergotti@haynesboone.com](mailto:robert.albergotti@haynesboone.com)  
Email: [ian.peck@haynesboone.com](mailto:ian.peck@haynesboone.com)  
Email: [jarom.yates@haynesboone.com](mailto:jarom.yates@haynesboone.com)

**PROPOSED ATTORNEYS FOR DEBTOR**

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

In re: § Chapter 11  
§  
TPP ACQUISITION, INC. d/b/a The § Case No. 16-33437-hdh-11  
Picture People, §  
§  
Debtor. §

**NOTICE OF EXPEDITED HEARING ON CERTAIN “FIRST DAY” MATTERS**

**PLEASE TAKE NOTICE** that an expedited hearing has been scheduled for **Wednesday, September 7, 2016 at 10:00 a.m. (Central Time)** before the Honorable Harlin D. Hale, at the Earle Cabell Federal Building, 1100 Commerce Street, 14th Floor, Courtroom No. 3, Dallas, Texas 75242 to consider the following matters:

- (i) *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 4];
- (ii) *Debtor’s Emergency Motion for Entry of Interim and Final Orders Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtor and Debtor in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Docket No. 5];
- (iii) *Debtor’s Emergency Motion for Entry of Interim and Final Orders Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtor and Debtor in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-*



- Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 6];*
- (iv) *Debtors' Emergency Motion for an Order Authorizing the Debtor to (I) Pay Certain Prepetition Wages, Other Compensation and Reimbursable Employee Expenses, and (II) Continue Employee Benefits Programs [Docket No. 8];*
  - (v) *Debtor's Emergency Motion for an Order (I) Authorizing Continued Use of Existing Business Forms and Records, (II) Authorizing Maintenance of Existing Corporate Bank Accounts and Cash Management System, (III) Authorizing Payment of Prepetition Costs and Fees Associated with Customer Credit and Debit Card Transactions, and (IV) Waiving Certain U.S. Trustee Requirements [Docket No. 9];*
  - (vi) *Debtor's Emergency Motion for Entry of Order Authorizing the Debtor to Honor Certain Prepetition Obligations to Customers and to Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 10];*
  - (vii) *Debtor's Emergency Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtor to (I) Continue its Insurance Policies, and (II) Pay Insurance Premiums Thereon [Docket No. 11];*
  - (viii) *Debtor's Emergency Motion for an Order Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507(a)(8) (I) Authorizing the Debtor to Pay Certain Prepetition Taxes and (II) Directing Financial Institutions to Honor and Process Related Checks and Transfers [Docket No. 12];*
  - (ix) *Debtor's Emergency Motion Pursuant to 11 U.S.C. §§ 105 and 363 for Authority to Pay or Honor Prepetition Obligations to Certain Shippers, Warehousemen and Miscellaneous Lien Claimants [Docket No. 14];*
  - (x) *Motion for an Extension of Time to File Schedules of Assets and Liabilities, Schedule of Executory Contracts, and Statement of Financial Affairs [Docket No. 15];*
  - (xi) *Debtor's Expedited First Omnibus Motion to Reject Certain Unexpired Real Property Leases Pursuant to Bankruptcy Code § 365 and Bankruptcy Rule 6006 [Docket No. 16]; and*
  - (xii) *Debtor's Application for Entry of an Order, Pursuant to 28 U.S.C. § 156(c), Authorizing the Retention and Appointment of Kurtzman Carson Consultants LLC as Claims, Noticing, and Balloting Agent Nunc Pro Tunc to the Petition Date [Docket No. 17].*

**PLEASE TAKE FURTHER NOTICE** that copies of the foregoing pleadings may be obtained (i) at the website established by the Debtor's proposed claims agent, Kurtzman Carson Consultants, at <http://www.kccllc.net/TPP> (ii) from the Court's website <http://www.txnb.uscourts.gov> via ECF/Pacer, or (iii) upon request to the undersigned.

DATED this 2nd day of September, 2016.

**HAYNES AND BOONE, LLP**

By: /s/ Robert D. Albergotti

Robert D. Albergotti  
State Bar No. 00969800  
Ian T. Peck  
State Bar No. 24013306  
Jarom J. Yates  
State Bar No. 24071134  
2323 Victory Avenue, Suite 700  
Dallas, TX 75219  
Telephone: 214.651.5000  
Facsimile: 214.651.5940  
Email: [robert.albergotti@haynesboone.com](mailto:robert.albergotti@haynesboone.com)  
Email: [ian.peck@haynesboone.com](mailto:ian.peck@haynesboone.com)  
Email: [jarom.yates@haynesboone.com](mailto:jarom.yates@haynesboone.com)

**PROPOSED ATTORNEYS FOR DEBTOR**