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**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. §

**DEBTOR’S MOTION FOR AN EXPEDITED HEARING ON DEBTOR’S EXPEDITED MOTION FOR ENTRY OF AN ORDER (I) SCHEDULING COMBINED HEARING ON APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN OF LIQUIDATION, (II) CONDITIONALLY APPROVING DISCLOSURE STATEMENT, (III) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES ON PLAN AND (IV) APPROVING RELATED MATTERS**

TPP Acquisition, Inc. d/b/a The Picture People (“TPP” or the “Debtor”), debtor-in-possession in the above-referenced chapter 11 case, hereby files this motion requesting a hearing on an expedited basis (the “Motion to Expedite”) to consider the *Debtor’s Expedited Motion for Entry of an Order (I) Scheduling Combined Hearing on Approval of Disclosure Statement and Confirmation of Plan of Liquidation, (II) Conditionally Approving Disclosure Statement, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan and (IV) Approving Related Matters* (the “Combined Hearing Motion”).



1. Through this Motion to Expedite, TPP requests that the Court consider the Combined Hearing Motion on an expedited basis on Tuesday, February 14, 2017 at 11:00 a.m. Prevailing Central Time.

2. Following the sale of its assets, the Debtor seeks to wind down its estate and distribute its remaining assets on an accelerated basis. Expedited relief on the Combined Hearing Motion is necessary, because without expedited relief the Debtor's administrative expenses will continue to build, making it increasingly more difficult for the Debtor to confirm a plan. Additionally, the Debtor already has an omnibus hearing scheduled for this date and time.

3. Notice of the proposed expedited hearing will be provided to: (i) the Office of the United States Trustee and (ii) the Debtor's Limited Service List. No other or further notice need be provided.

WHEREFORE the Debtor respectfully requests that the Court (i) grant the Motion to Expedite and (ii) grant such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED this 27th day of January, 2017.

**HAYNES AND BOONE, LLP**

By: /s/ Robert D. Albergotti

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**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on January 27, 2017, he conferred with Nancy Resnick, counsel to the U.S. Trustee about the relief requested in the Motion to Expedite. The U.S. Trustee does not object to an expedited setting. Additionally, the undersigned certifies that on several occasions prior to January 27, 2017, he conferred with Michael Neumeister, counsel to the Committee, about the relief requested in the Motion to Expedite. The Committee does not object to an expedited setting.

/s/ Jarom J. Yates

Jarom J. Yates