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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

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In Re:	)	
	)	
Betta Burger Group, LLC – Series A,	)	NO. 18-18394
Debtor	)	
	)	Chapter 11
	)	
	)	Honorable Judge Carol A. Doyle

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**NOTICE OF MOTION**

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on November 7, 2018, at 10:30 AM, the undersigned will appear before the Honorable Carol A. Doyle at the Dirksen Federal Building, located at 219 S. Dearborn, Courtroom 742, Chicago, Illinois and will then and there present the attached **DEBTOR'S MOTION FOR EXTENSION OF EXCLUSIVE PERIOD FOR FILING PLAN AND OBTAINING ACCEPTANCES OF PLAN AND DATE TO FILE PLAN AND DISCLOSURE STATEMENT THROUGH AND INCLUDING JANUARY 24, 2019**, at which time you may appear if you so choose.

BY: /S/ PAUL M. BACH  
BACH LAW OFFICES  
COUNSEL FOR DEBTOR  
P.O. BOX 1285  
NORTHBROOK, IL 60065  
PHONE: (847) 564-0808  
ATTORNEY NO: 6209530

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**DEBTOR'S MOTION FOR EXTENSION OF EXCLUSIVE PERIOD FOR FILING  
PLAN AND OBTAINING ACCEPTANCES OF PLAN AND DATE TO FILE PLAN AND  
DISCLOSURE STATEMENT THROUGH AND INCLUDING JANUARY 24, 2019**

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**NOW COMES**, the Debtor, the Betta Burger Group, LLC – Series A (“Debtor”), by and through its attorneys, Paul M. Bach and Penelope N. Bach of Bach Law Offices, and bringing this Motion to Extend the Exclusive Period for filing the Chapter 11 Plan and Obtaining Acceptances of the Plan an additional ninety (90) days through and including January 24, 2019 and in support thereof states as follows:

1. The instant bankruptcy proceeding was filed under Chapter 11 of the Bankruptcy Code on June 28, 2018.
2. On July 26, 2018, the Court ordered the Debtor to file a Plan and Disclosure Statement on or before October 26, 2018.
3. Pursuant to 11 USC 1121(b), "only the debtor may file a plan until after 120 days after the date of the order for relief under this chapter." 120 days after the date of the filing of the petition in this case is October 26, 2018.
4. Pursuant to 11 USC 1121(d)(1), "Subject to paragraph (2), on request of a party made within the respective periods specified in subsections (b) and (c) of this section and after notice

and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section."

5. The new requested date of January 24, 2019 is well within the time limitations set by 11 USC 1121(d).

6. The Debtor, is working on a consensual plan and needs additional time to work through plan language with its creditors.

7. The Debtor believes that the agreed plan will be filed on or before December 24, 2018.

8. This is the Debtor's first request for and extension of exclusivity and to extend the date to file a Chapter 11 Plan and Disclosure Statement.

9. The extension of time will not prejudice any creditors or the United States Trustee.

**WHEREFORE**, Debtor, Betta Burger Group, LLC – Series A, prays this Honorable Court for the following relief:

A. Extending the Exclusive Period for filing the Chapter 11 Plan and Obtaining Acceptances of the Plan an additional ninety (90) days through and including January 24, 2019;

B. For such other and further relief this Court deems just and proper.

Dated: October 25, 2018

Respectfully Submitted,

/s/ Penelope N. Bach  
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