UNITED STATES BANKRUPTCY COURT

DISTRIC OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LAW OFFICES OF JAE Y. KIM, LLC One University Plaza, Suite 212

Hackensack, New Jersey 07601

Attorney ID: 04451995

Tel: (201) 488-8600 Fax: (201) 488-8633

E-mail: jkim@jyklaw.com Attorneys for debtor,

Palisades Park Plaza, LLC

In Re:

PALISADES PARK PLAZA, LLC,

Debtor.

Case No.:

15-32649

Chapter:

11

Hearing Date:

1/23/18

Judge:

Stacey L. Meisel, USBJ

DEBTOR'S NOTICE OF MOTION FOR TO APPROVE POST-PETITION FINANCING NUNC PRO TUNC

Palisades Park Plaza, LLC (the "Debtor") filed papers with the court to seek approval of post-petition financing Nunc Pro Tunc pursuant to 11 U.S.C. §§105, 361, 362, 363, 364(c)(1), 364(c)(2), 64(c)(3) and 364(d)(1). Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant Debtor's requested relief or if you want the court to consider your views on the motion, then not later than 7 days before the hearing date, or as specified by the Court, you or your attorney must file with the court a written response either opposing the Debtor's motion

or file a cross-motion. A cross-motion must relate to the original motion. The documents must be filed at:

Clerk, United States Bankruptcy Court 50 Walnut Street Newark, NJ 07102

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the hearing date or as specified by the Court. You must also mail a copy to:

Jae Y. Kim, Esq. Law Offices of Jae Y. Kim, L.L.C. One University Plaza, Suite 212 Hackensack, NJ 07601

You must attend the hearing scheduled to be held on January 23, 2018, at 11:00 a.m. in the Courtroom of the Honorable Stacey L. Meisel, U.S.B.J., United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, NJ 07102.

If you or your attorney do not take these steps, the court may decide you do not oppose the relief sought in the motion or objection and may enter an order granting the requested relief.

LAW OFFICES OF JAE Y. KIM, LLC Attorneys for Debtor Palisades Park Plaza, LLC

Dated; December 22,2017

By: /s/ Jae Y. Kim

Jae Y. Kim, Esq.

CERTIFICATE OF SERVICE

I certify that on this 22nd day of December, 2017, a true and correct copy of the foregoing Motion To Approve Post-Petition Financing *Nunc Pro Tunc* filed with the Clerk of the Court, was served on all parties listed below via electronic filing or first class mail:

Glenn Reiser, Esq. LoFaro & Reiser, LLP 20 Court Street Hackensack, NJ 07601

Ivana Volkov, Esq. Cole Schotz, PC Court Plaza North Hackensack, NJ 07601

Office of the United State Trustee One Newark Center Suite 2100 Newark, NJ 07102

John W. Sywilok, Esq. 51 Main Street Hackensack, NJ 07601

LAW OFFICES OF JAE Y. KIM, LLC Attorneys for Debtor Palisades Park Plaza, LLC

Dated; December 22,2017 By: /s/ Jae Y. Kim

Jae Y. Kim, Esq.