

**LOWENSTEIN SANDLER LLP**

Kenneth A. Rosen, Esq.  
Sharon L. Levine, Esq.  
Elie J. Worenklein, Esq.  
65 Livingston Avenue  
Roseland, New Jersey 07068  
(973) 597-2500 (Telephone)  
(973) 597-2400 (Facsimile)

*Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

Crumbs Bake Shop, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 14-24287 (MBK)

(Jointly Administered)

**Hearing Date:** December 1, 2014 at 11:00 a.m. (ET)

**Objection Deadline:** November 24, 2014

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER (I) PURSUANT TO 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 9019, AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO SETTLE CERTAIN LIABILITY CLAIMS ON BEHALF OF THE DEBTORS AND (II) DISMISSING THE CHAPTER 11 CASES**

**PLEASE TAKE NOTICE** that on **December 1, 2014 at 11:00 a.m. (ET)**, or as soon thereafter as counsel may be heard, the Official Committee of Unsecured Creditors (the

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number are: Crumbs Bake Shop, Inc. (5274); Crumbs Holdings LLC (8045); Crumbs 42<sup>nd</sup> Street II, LLC (5913); Crumbs Broad Street, LLC (5319); Crumbs Broadway LLC (2653); Crumbs Federal Street, LLC (9870); Crumbs Garment Center LLC (5142); Crumbs Grand Central LLC (5030); Crumbs Greenvale LLC (6562); Crumbs Greenwich, LLC (3097); Crumbs Hoboken, LLC (5808); Crumbs II, LLC (5633); Crumbs Larchmont, LLC (8460); Crumbs Lexington LLC (0286); Crumbs Park Avenue LLC (5273); Crumbs Retail Bake Shops, LLC (f/k/a Crumbs Fulton Street, LLC) (0930); Crumbs Stamford, LLC (8692); Crumbs Third Avenue LLC (6756); Crumbs Times Square LLC (1449); Crumbs Union Square LLC (8629); Crumbs Union Station LLC (6968); Crumbs West Madison, LLC (5017); Crumbs Woodbury LLC (2588).

“Committee”) of the captioned debtors (the “Debtors”) will move the *Motion of the Official Committee of Unsecured Creditors for Entry of an Order (i) Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 9019, Authorizing the Official Committee Of Unsecured Creditors to Settle Certain Liability Claims on Behalf of the Debtors and (ii) Dismissing the Chapter 11 Cases [Docket No. 285]* (the “Motion”) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Trenton, NJ 08608. The Committee shall rely upon the Motion. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of order was also submitted with the Motion. Oral argument is requested in the event an objection is timely filed.

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion (each, an “Objection” and together, the “Objections”) must be filed with the Clerk of the Court together with proof of service thereof, and served so as to be **actually received no later November 24, 2014** on: (i) counsel to the Committee; (ii) counsel to the Debtors; (iii) the Office of the United States Trustee for the District of New Jersey; and (iv) all parties that filed a request for notice pursuant to Bankruptcy Rule 2002. Objections, if any, must: (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules, and other case management rules or orders of this Court; and (c) state with particularity the legal and factual basis for the Objection and, unless an Objection is timely served and filed, it may not be considered by the Bankruptcy Court.

Dated: October 31, 2014

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

*/s/ Sharon L. Levine*

---

Kenneth A. Rosen, Esq.

Sharon Levine, Esq.

65 Livingston Avenue

Roseland, New Jersey 07068

Telephone: 973-597-2500

Facsimile: 973-597-2400

slevine@lowenstein.com

*Counsel to the Official Committee of Unsecured  
Creditors*