Docket #0864 Date Filed: 12/11/2024

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

In Re: PREMIER KINGS, INC., et al.	CASE NO. 23-02871 (TOM11)
Debtor.	(Jointly Administered)
PREMIER HOLDINGS OF GEORGIA, LLC,	
Plaintiff,	
v.	Adv. Proc. No. 24-00016-TOM
RRG OF JACKSONVILLE, LLC,))
Defendant.)))

PLAINTIFF PREMIER HOLDINGS OF GEORGIA LLC'S NOTICE OF FILING DEMONSTRATIVE EXHIBIT

COMES NOW, plaintiff Premier Holdings of Georgia, LLC ("PHGA"), by and through its undersigned counsel, and hereby files the following demonstrative exhibit (the "Demonstrative Exhibit") in support of PHGA's Motion for Summary Judgment [AP Doc. No. 43], PHGA's Brief in Support of Opposition to Defendant's Motion for Judgment on the Pleadings, Defendant's Presumed Motion for Summary Judgment, Defendant's Motion for Relief from Order Assuming and Assigning Contract, and Brief in Support of Plaintiff's Motion for Summary Judgment [AP Doc. No. 48; Bankr. Doc. No. 847], PHGA's Brief in Reply to Defendant's Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment [AP. Doc. No. 57; Bankr. Doc. No. 860], and PHGA's Evidentiary Submission in Support of Plaintiff Premier Holdings of Georgia, LLC's Motion for Summary Judgment [AP Doc. No. 47; Bankr. Doc. No. 846], entitled: PHGA and RRG Notable Dates Timeline. PHGA intends to reference the Demonstrative Exhibit during

the hearing set for Monday, December 16, 2024. The Demonstrative Exhibit is attached hereto as

Exhibit "A."

Dated this the 11th day of December, 2024.

/s/ Heather A. Jamison

Michael Leo Hall (AL Bar #ASB-8891-A55M) Heather A. Jamison (AL Bar #ASB-8673-H49L) Chloe E. Champion (AL Bar #ASB-5104-Q54H)

Counsel for Plaintiff, Premier Holdings of Georgia, LLC

OF COUNSEL:

BURR & FORMAN LLP 420 North 20th Street Suite 3400 Birmingham, AL 35203 Telephone: (205) 251-300

Telephone: (205) 251-3000 Facsimile: (205) 458-5100 Email: mhall@burr.com

hjamison@burr.com cchampion@burr.com

CERTIFICATE OF SERVICE

Service of the foregoing shall be made via ECF to all parties entitled to notice thereunder, and to the following via e-mail, and if e-mail is not available via U.S. mail, on this the 11th day of December, 2024:

Peter J. Haley Nelson Mullins Riley & Scarborough LLP One Financial Center, 35th Floor Boston, Massachusetts 02111 Email: peter.haley@nelsonmullins.com

Gregory M. Taube Nelson Mullins Riley & Scarborough LLP 201 17th Street, NW, Suite 1700 Atlanta, Georgia 30363 Email: greg.taube@nelsonmullins.com

> /s/ Heather A. Jamison OF COUNSEL

EXHIBIT A

PHGA AND RRG NOTABLE DATES TIMELINE

[see following page]

EVENT
PKGI and Ground Landlord entered into the Ground Lease
PHGA and PKGI entered into the Development Agreement
Debtors' Petition Date
Debtor PKGI and RRG entered into the APA
Sale Order entered approving RRG's APA
RRG's deadline to designate leases to assume
RRG received copies of the Ground Lease and Development Agreement
RRG's deadline to remove designated leases from assumption
Closing Date
Assignment and Assumption of Ground Lease subject to the Development Agreement
Debtor PKGI paid cure costs due under Development Agreement
PHGA filed the Adversary Proceeding