

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

In the Matter of:	)	Bankruptcy Case #
PREMIER KINGS, INC., <i>et al.</i> , <sup>1</sup>	)	23-02871-TOM-11
	)	(Jointly Administered)

**BANKRUPTCY ADMINISTRATOR’S LIMITED OBJECTION TO DISCLOSURE  
STATEMENT FOR PLAN OF LIQUIDATION UNDER CHAPTER 11 OF THE  
BANKRUPTCY CODE PROPOSED BY THE DEBTORS**

COMES NOW the undersigned, on behalf of the Bankruptcy Administrator for the Northern District of Alabama (hereinafter “B.A.”), and regarding the Disclosure Statement (Doc. No. 474) described herein, states as follows:

1. The B. A. has reviewed the Disclosure Statement (Doc. No. 474) filed by Debtors and has the following objections:

2. On page 4, last line the phone number should be 205-714-4000, instead of 205-714-3830. The same phone number should be changed: on page 37, VIII. A. The Confirmation Hearing, line 5; and also at page 40, last line.

3. On page 6, (and page 16, paragraph 2.) The B.A. would prefer to have seven (7) days before the date of the hearing on any Professional Fee Claim Application to file any objections, rather than 21 days from filing and service of said application.

4. On page 9, paragraph A. Fourth paragraph, line 5. Typo: “id” should be “is.”

5. On page 11, last line: An official committee of unsecured creditors was appointed on November 6, 2023. [Doc. No. 135].

6. On page 19, number 3. “Substantive Consolidation.” If the court grants substantive consolidation, quarterly fees for will be due for Premier Kings of Georgia, Inc., and Premier Kings of North Alabama, LLC for the period that they were separate cases in a new quarter after March 31, 2024 until the date that substantive consolidation occurs.

7. On page 22 (d) Interim and Final Distributions, line 9 “(iii)...chapter 11 cases as applicable,” the B.A. proposes adding “*including quarterly fees.*”

8. On page 30 at paragraph 7.(a), line 14 “No bond or other indemnity shall be required of the Plan Administrator, the B.A. also proposes: “*and the Plan Administrator is relieved of the requirements of 11 U.S.C. §345 regarding funds under their control.*” Similar language should

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<sup>1</sup>The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification numbers, are: Premier Kings, Inc. (3932); Premier Kings of Georgia, Inc. (9797); and Premier Kings of North Alabama, LLC (9282). The Debtors’ address is 7078 Peachtree Industrial I  
30071.



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be added into the Plan at page 24, Section 13.8 (a) at line 15.

WHEREFORE, these premises considered, the Bankruptcy Administrator objects to the Disclosure Statement and recommends that the Disclosure Statement be amended or not approved in its current form.

Respectfully submitted this the 13<sup>th</sup> day of March, 2024.

/s/ Jon A. Dudeck

**Jon A. Dudeck**

Assistant U.S. Bankruptcy Administrator

**UNITED STATES BANKRUPTCY ADMINISTRATOR**

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**CERTIFICATE OF SERVICE**

I hereby certify to the Court that on 13<sup>th</sup> day of March, 2024 I electronically filed the above and foregoing with the Court's CM/ECF system, which will send notification of such filing to all parties requesting electronic service via CM/ECF.

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/s/ Jon A. Dudeck

**Jon A. Dudeck**

Assistant U.S. Bankruptcy Administrator