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Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
CASE NO. 14-

Chapter 11  
(Joint Administration Pending)

In re:

CRUMBS BAKE SHOP, INC., *et al.*,<sup>1</sup>  
Debtors-in-Possession.

**NOTICE OF MOTION FOR AN  
INTERIM AND FINAL ORDER:  
(I) AUTHORIZING THE DEBTORS TO  
OBTAIN POST-PETITION FINANCING  
PURSUANT TO 11 U.S.C. §§ 105, 361,  
362, 364(c) AND 364(e);  
(II) AUTHORIZING USE OF CASH  
COLLATERAL; (III) SCHEDULING A  
FINAL HEARING PURSUANT TO FED.  
R. BANKR. P. 4001; AND  
(IV) GRANTING OTHER RELATED  
RELIEF**

**HEARING DATE AND TIME:**  
June \_\_\_\_, 2014, at \_\_: \_\_ .m.

**ORAL ARGUMENT REQUESTED**

TO: All Parties-in-Interest

<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).

PLEASE TAKE NOTICE that pursuant to an Order Regarding Application for Expedited Consideration of First Day Matters served simultaneously herewith, on the \_\_\_\_ day of June, 2014, at \_\_: \_\_ .m., or as soon thereafter as counsel may be heard, the undersigned, proposed attorneys for Crumbs Bake Shop, Inc., *et al.*, the within debtors and debtors-in-possession (the “**Debtors**”), shall move before the assigned United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, Clarkson S. Fisher, US Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an interim and final Order (a) authorizing the Debtors to obtain post-petition financing pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c) and 364(e); (b) authorizing use of cash collateral; (c) scheduling a final hearing pursuant to Bankruptcy Rule 4001, and (d) granting other related relief (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the “First Day” Affidavit of John D. Ireland and the accompanying Application which sets forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be presented in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion.

COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.  
Proposed Attorneys for Crumbs Bake Shop, Inc.,  
*et al.*, Debtors-in-Possession

By: /s/ Michael D. Sirota  
Michael D. Sirota, Esq.  
David M. Bass, Esq.  
Felice R. Yudkin, Esq.

DATED: July 11, 2014