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Debtors-in-Possession

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

In re:

CRUMBS BAKE SHOP, INC., *et al.*,<sup>1</sup>

Debtors-in-Possession.

Chapter 11

(Joint Administration Pending)

**HEARING DATE AND TIME:**

July \_\_\_\_\_, 2014, at \_\_: \_\_ .m.

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION FOR AN ADMINISTRATIVE ORDER ESTABLISHING  
PROCEDURES FOR ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES TO PROFESSIONALS**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that pursuant to an Order Regarding Application for Expedited  
Consideration of First Day Matters served herewith, on the \_\_\_\_\_ day of July, 2014, at  
\_\_\_\_\_ .m., or as soon thereafter as counsel may be heard, the undersigned, proposed counsel

<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).

for Crumbs Bank Shop, Inc., *et al.*, the within debtors and debtors-in-possession (collectively, 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, for entry of an Administrative Order establishing procedures for allowance and payment of interim compensation and reimbursement of expenses to professionals (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 presented, 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  
David M. Bass  
Felice R. Yudkin

DATED: July 11, 2014