

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|---|---|-------------------------------------|
| IN RE: |) | Chapter 11 |
| |) | |
| FRIENDLY ICE CREAM CORPORATION, <i>et al.</i> , |) | Case No. 11-13167 (KG) |
| |) | |
| Debtor. |) | Jointly Administered |
| |) | |
| |) | Related Docket No. 7 and 171 |

OBJECTION OF J&T TSAI, INC. TO THE DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING (A) REJECTION OF CERTAIN UNEXPIRED LEASES AND (B) ABANDONMENT OF CERTAIN PERSONAL PROPERTY, EACH EFFECTIVE AS OF VACATION OF PREMISES

J&T Tsai, Inc. (the "Landlord") hereby objects to the *Debtors' Motion for Entry of an Order Authorizing and Approving (A) Rejection of Certain Unexpired Leases and (B) Abandonment of Certain Personal Property, Each Effective as of Vacation of Premises* (the "Motion") and respectfully states as follows:

1. Friendly Ice Cream Corporation and its affiliates (the "Debtors") filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on October 5, 2011 (the "Petition Date").

2. The Landlord and Debtors are parties to an unexpired lease of nonresidential real property for certain premises located as 682 Glen Street, Glen Falls, NY 12804 (Store No. 183) (the "Lease").

3. The Landlord objects to the Motion for the reasons stated in the objection of Marilyn Matlin, Trustee of the Marilyn Matlin Revocable Trust (Docket No. 171) (the "Objection") and respectfully requests that the relief sought in the Objection be granted to the Landlord and that an order be entered in conformity therewith.

WHEREFORE, the Landlord respectfully requests that (i) the relief sought in the Objection be granted to the Landlord and (ii) the Court grant to the Landlord such other relief and further relief as just and proper.

Date: October 20, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

William A. Hazeltine (No. 3294)
Seth S. Brostoff (No.
901 North Market Street, Suite 1300
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195

Attorneys for J&T Tsai, Inc.