

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 11
GROEB FARMS, INC.	)	Case No. 13-58200
Debtor.	)	Honorable Walter Shapero

**SUPPLEMENTAL DECLARATION OF JOSEPH B. TYSON, JR. IN SUPPORT OF THE  
DEBTOR'S APPLICATION TO EMPLOY FOLEY & LARDNER LLP PURSUANT TO  
SECTIONS 327(a), 328(a), 329 AND 1107 OF THE BANKRUPTCY CODE,  
FEDERAL RULES OF BANKRUPTCY PROCEDURE 2014(a) AND 2016(b)  
AND LOCAL BANKRUPTCY RULES 2014-1 AND 2016-1, OR IN THE  
ALTERNATIVE, SPECIAL COUNSEL PURSUANT TO 11 U.S.C. §§ 327(e), 328(a), 329  
& 1107, RULES 2014(a) & 2016(b) OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE AND LOCAL BANKRUPTCY RULE 2014-1**

Joseph B. Tyson, Jr. hereby declares as follows:

1. I am an attorney admitted to practice in the State of Wisconsin. I am a partner with the law firm of Foley & Lardner LLP ("Foley"). I have a corporate and transactional practice. Foley is one of the largest law firms in the United States, with twenty-two offices worldwide and approximately 900 attorneys.

2. I make this supplemental declaration (the "Supplemental Declaration") in connection with the Debtor's First Day Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 328(a), 329 and 1107 of the Bankruptcy Code, Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 2014-1 and Special Counsel pursuant to Sections 327(e), 328(a), 329 and 1107 of title 11 of the Bankruptcy Code, Rules 2014(a) and 2016(b) of the Bankruptcy Rules, and



Rule 2014-1 of the Local Rules (together with any exhibits or attachments) (the "Application").

I make this Declaration from my personal knowledge.

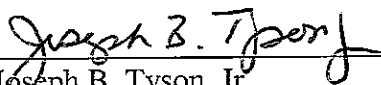
3. On October 3, 2013, Foley ended its representation of Horizon Partners, Ltd. in connection with the Putative Class Action.<sup>1</sup> Foley continues to represent Horizon Partners, Ltd. with respect to matters unrelated to the Debtor or this chapter 11 case.

4. Also on October 3, 2013, Foley ended its representation of George Cawman in connection with the Putative Class Action.

5. As of the date of this Supplemental Declaration, Foley represents no clients other than the Debtor in connection with the Putative Class Action

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 4, 2013.

  
\_\_\_\_\_  
Joseph B. Tyson, Jr.

---

<sup>1</sup> All capitalized terms not defined herein have the meanings ascribed to them in the Application.