

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

In re:  GROEB FARMS, INC.  Debtor.	) ) ) ) ) ) )	Chapter 11  Case No. 13-58200  Tax I.D. No. 38-2778390
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**NOTICE OF FILING AMENDED NOTICES OF BAR DATE**

The Debtor, by and through its attorneys, Foley & Lardner LLP, hereby submits the attached amended notices (the “Amended Notices”) pursuant to Debtor’s First Day Motion for an Order Establishing Bar Date for Filing Proofs of Claim, Including 503(b)(9) Claims and Approving Form and Manner of Notice Thereof filed on October 1, 2013 [Dkt No. 19]. The Amended Notices have been amended based on the record of hearing held on October 3, 2013.

Dated: October 4, 2013  
Detroit, Michigan

FOLEY & LARDNER LLP

/s/ Judy A. O’Neill  
 Judy A. O’Neill (P32142)  
 John A. Simon (P61866)  
 Tamar N. Dolcourt (P73425)  
 One Detroit Center  
 500 Woodward Ave., Suite 2700  
 Detroit, MI 48226-3489  
 (313) 234-7100 (Telephone)  
 (313) 234-2800 (Facsimile)

*Proposed Counsel for the Debtor and  
Debtor in Possession*



# **EXHIBIT A**

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

In re:

GROEB FARMS, INC.,

Debtor.

Case No.

Hon.

Chapter 11

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**NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM OR INTEREST**

PLEASE TAKE NOTICE that on [\_\_\_\_\_, 2013], (the “Order Date”), the United States Bankruptcy Court for the Eastern District of Michigan (the “Court”) entered an order (the “Bar Date Order”) establishing **November 4, 2013**, as the general claims bar date (the “General Bar Date”) in this case, contingent upon the Debtor filing its Schedules and Statement of Financial Affairs on or before October 15, 2013. The Court has entered an Order establishing **March 31, 2014** as the governmental bar date in this case (the “Governmental Bar Date”). Except as described below, the Bar Date Order requires all Entities, as defined in § 101(15) of the Bankruptcy Code, 11 U.S.C. §§ 101-1330 (the “Bankruptcy Code”), including persons, corporations, partnerships, estates, trusts, and the United States Trustee, that have or assert any pre-petition Claims (as defined herein) against or interests in the Debtor, to file a proof of claim, so that such proof of claim is received by Kurtzman Carson Consultants, LLC (“KCC”) on or before 4:00 p.m., Pacific Time, on **November 4, 2013** or **March 31, 2014**, as applicable. For your convenience, enclosed with this Notice is a copy of the proof of claim form, and instructions on completing it.

**ENTITIES WHO OR WHICH MUST FILE A PROOF OF CLAIM**

Pursuant to the Bar Date Order, all Entities holding Claims against the Debtor (whether secured, priority or unsecured), that arose prior to October 1, 2013, are required to file proofs of claim by the General Bar Date, including, without limitation, creditors whose Claims against the Debtor arise out of the rejection of executory contracts or unexpired leases by the Debtor prior to the entry of the order establishing the General Bar Date. Entities holding claims that arise under section 503(b)(9) of the Bankruptcy Code may file a proof of claim on or before the General Bar Date, or may file a motion with the Court requesting approval of such claim on or before the General Bar Date. All governmental units holding Claims against the Debtor that arose prior to October 1, 2013, are required to file proofs of claim by the Governmental Bar Date.

If, subsequent to the mailing of this Notice, the Debtor amends the Schedules to adversely change or alter a Claim against the Debtor in any way, then the affected claimant shall have 30 days from the date of service of notice thereof to file a proof of claim or to amend any previously filed proof of claim with respect to such amended scheduled claim (the “Amended Schedule Bar Date”).

### **CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM**

Any Entity that is required to file a proof of claim, or in the case of an Entity holding claims arising under section 503(b)(9) of the Bankruptcy Code, file a motion with the Court for approval of such claim, but that fails to do so on or before the General Bar Date or Governmental Bar Date, as applicable, will be forever barred, estopped and enjoined from: (i) asserting any Claim against the Debtor that such Person has that (a) is an amount that exceeds the amount, if any, that is set forth in the Schedules as undisputed, noncontingent and liquidated or (b) is of a different nature or in a different classification (any such Claim being referred to as an “Unscheduled Claim”) than that listed in the Schedules; and (iii) voting upon, or receiving distributions under, any plan of reorganization in this case with respect to an Unscheduled Claim. If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to the amount or is otherwise properly scheduled and classified, you must file a proof of claim on or before the General Bar Date, or the Governmental Bar date, as applicable.

### **RESERVATION OF RIGHTS**

The Debtor reserves the right to dispute, or to assert offsets or defenses against any filed Claim or any Claim listed or reflected in the Schedules, or any motion for approval of a Claim arising under section 503(b)(9) of the Bankruptcy Code, as to nature, amount, liability, nature, classification or otherwise. Nothing in this Notice shall preclude the Debtor from objecting to any Claim, whether scheduled or filed, on any grounds.

### **NOTICE OF FILING OF THE DEBTOR'S SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

The General Bar Date of November 4, 2013, is set contingent upon the Debtor filings its Schedules and Statement of Financial Affairs on or before October 15, 2013. You will receive a separate notice when the Schedules and Statement of Financial Affairs are filed.

### **TIME AND PLACE FOR FILING PROOFS OF CLAIM**

A signed original of any proof of claim, together with accompanying documentation, must be delivered in person, via mail or courier to

**Groeb Farms Claims Processing Center  
c/o KCC  
2335 Alaska Avenue  
El Segundo, CA 90245**

The proof of claim must be received no later than 4:00 p.m., Pacific Time, on November 4, 2013. ***Any proof of claim submitted by facsimile will not be accepted and will not be deemed filed until such proof of claim is submitted by one of the methods described above.*** Proofs of claim will be deemed filed only when actually received by KCC. If you wish to receive acknowledgment of receipt of your proof of claim, you must also submit a copy of your original and a self-addressed envelope.

**DEFINITION OF CLAIM**

For purposes of this Bar Date Notice, “Claim” shall mean, as to or against the Debtor: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, fixed, contingent, matured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

**ADDITIONAL INFORMATION**

If you require additional information regarding the filing of a proof of claim, you may contact KCC, 2335 Alaska Avenue, El Segundo, CA 90245, by phone toll-free is 877-725-7539 (for callers in the US and Canada) or 424-236-7247 (for international callers), or by reviewing the website for this case located at [www.kccllc.net/groebfarms](http://www.kccllc.net/groebfarms).

Dated: \_\_\_\_\_, 2013

BY ORDER OF THE UNITED STATES  
BANKRUPTCY COURT

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*Counsel for the Debtor and Debtor in  
Possession*

# **EXHIBIT B**

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

In re:

GROEB FARMS, INC.,

Case No. 13-58200

Debtor.

Hon. Walter Shapero

Chapter 11

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**NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM OR INTEREST**

On [\_\_\_\_\_, 2013], (the “Order Date”), the United States Bankruptcy Court for the Eastern District of Michigan (the “Court”) entered an order (the “Bar Date Order”) establishing **November 4, 2013**, as the general claims bar date (the “General Bar Date”) in this case, contingent upon the Debtor filing its Schedules and Statement of Financial Affairs or before October 15, 2013. The Court also entered an Order establishing **March 31, 2014** as the governmental claims bar date (the “Governmental Bar Date”). Except as described below, the Bar Date Order requires all Entities, as defined in § 101(15) of the Bankruptcy Code, 11 U.S.C. §§ 101-1330 (the “Bankruptcy Code”), including persons, corporations, partnerships, estates, trusts, and the United States Trustee, that have or assert as to or against the Debtor: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, fixed, contingent, matured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured, or (ii) any interest in the Debtor, to file a proof of claim, so that such proof of claim is received by Kurtzman Carson Consultants, LLC (“KCC”) on or before 4:00 p.m., Pacific Time, on **November 4, 2013** or **March 31, 2014**, as applicable.

Pursuant to the Bar Date Order, all Entities holding Claims against the Debtor (whether secured, priority or unsecured), or interest that arose prior to October 1, 2013, are required to file proofs of claim by the General Bar Date, or the Governmental Bar Date, as applicable, including, without limitation, creditors whose Claims against the Debtor arise out of the rejection of executory contracts or unexpired leases by the Debtor prior to the entry of the order establishing the General Bar Date. Entities holding any claims under Section 503(b)(9) of the Bankruptcy Code may file a proof of claim on or before the General Bar Date, or may file a motion with the Court for approval of such claim, on or before the General Bar Date.

A signed original of any proof of claim, together with accompanying documentation, must be delivered via hand delivery, mail or courier to: **Groeb Farms Claims Processing Center, c/o KCC, 2335 Alaska Avenue, El Segundo, CA 90245** so as to be received no later than 4:00 p.m., Pacific Time, on November 4, 2013. *Any proof of claim submitted by facsimile will not*

***be accepted and will not be deemed filed until such proof of claim is submitted by one of the methods described above.*** Proofs of claim will be deemed filed only when actually received by KCC. If you wish to receive acknowledgment of receipt of your proof of claim, you must also submit a copy of your original and a self-addressed envelope.

Any Entity that is required to file a proof of claim, but that fails to do so on or before the General Bar Date or the Governmental Bar Date, as applicable, and any Entities holding any claims under section 503(b)(9) of the Bankruptcy Code who fail to file a proof of claim on or before the General Bar Date, or file a motion with the Court for approval of such claim, on or before the General Bar Date, will be forever barred, estopped and enjoined from: (i) asserting any Claim against the Debtor that such Person has that (a) is an amount that exceeds the amount, if any, that is set forth in the Debtor's Schedules as undisputed, noncontingent and liquidated or (b) is of a different nature or in a different classification (any such Claim being referred to as an "Unscheduled Claim") than that listed in the Schedules; and (iii) voting upon, or receiving distributions under, any plan of reorganization in this case with respect to an Unscheduled Claim. If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to the amount or is otherwise properly scheduled and classified, you must file a proof of claim on or before the General Bar Date.

Nothing in this Notice shall preclude the Debtor from objecting to any Claim, whether scheduled or filed, on any grounds, nor shall it preclude Debtor from objecting to any claim under section 503(b)(9) of the Bankruptcy Code, whether such claim is filed as a proof of claim or a motion for approval with the Court.

If you require additional information regarding the filing of a proof of claim, you may contact KCC, 2335 Alaska Avenue, El Segundo, CA 90245, by phone toll-free is 877-725-7539 (for callers in the US and Canada) or 424-236-7247 (for international callers), or by reviewing the website for this case located at [www.kcellc.net/groebfarms](http://www.kcellc.net/groebfarms).

Dated: \_\_\_\_\_, 2013

BY ORDER OF THE UNITED STATES  
BANKRUPTCY COURT

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