

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

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

NOTICE OF EXPEDITED DISCLOSURE STATEMENT HEARING

TO: ALL KNOWN CREDITORS OF THE DEBTORS AND OTHER PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES

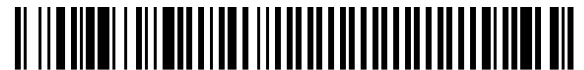
PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On October 1, 2013, Groeb Farms, Inc. (the “**Debtor**”) filed the *Disclosure Statement for the Debtor’s Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* (as may be amended, modified or supplemented, the “**Disclosure Statement**”) [Docket No. 23] with the United States Bankruptcy Court for the Eastern District of Michigan (the “**Bankruptcy Court**”). The Debtor submitted the Disclosure Statement pursuant to section 1125 of the Bankruptcy Code for use in the solicitation of votes on the *Debtor’s Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* (as may be amended, modified or supplemented, including the Plan Supplement and all other exhibits and schedules, the “**Plan**”), a copy of which was filed with the Bankruptcy Court on October 1, 2013, as an exhibit to the Disclosure Statement. The Debtor may file an amended Plan and Disclosure Statement prior to the Disclosure Statement Hearing (as defined below) and reserves the right to amend, supplement, or modify such documents further. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan or Disclosure Statement, as the context so requires.

2. You recently received a notice (the “**Disclosure Statement Hearing Notice**”) that the Debtor’s Disclosure Statement would be heard on November 21, 2013 at 1:30 p.m. (the “**Disclosure Statement Hearing**”). The Disclosure Statement Hearing Notice also informed you that the Disclosure Statement Hearing may be expedited. The hearing previously scheduled for November 21, 2013 has been expedited and is now scheduled before the Honorable Walter Shapero, United States Bankruptcy Judge for the Eastern District of Michigan, on November 8, 2013 at 10:00 a.m. at the United States Courthouse, Courtroom 1042, 231 West Lafayette Street, Detroit, MI 48226 to consider the entry of an order approving, among other things, (a) the Disclosure Statement as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code; (b) procedures for soliciting, receiving and tabulating votes on the Plan and for filing objections to the Plan; (c) the form of ballots, notices, and certain other documents to be distributed in connection with the solicitation of the Plan; (d) the deadlines contained in the solicitation and confirmation procedures; and (e) the procedures for notice of the confirmation hearing and filing objections to confirmation of the Plan. The previously scheduled November 21, 2013 hearing has been canceled.

**PLEASE BE ADVISED THAT THE DISCLOSURE STATEMENT HEARING
MAY BE CONTINUED FROM TIME TO TIME BY THE COURT OR THE DEBTOR WITHOUT
FURTHER NOTICE OTHER THAN BY SUCH ADJOURNMENT BEING ANNOUNCED
IN OPEN COURT OR BY A NOTICE OF ADJOURNMENT FILED WITH THE COURT.**

3. Copies of the Disclosure Statement and Plan, and any amendments to those documents, may be obtained (i) from Kurtzman Carson Consultants, LLC (a) at www.kccllc.net/groebfarms, by clicking on the “Court Documents” link, (b) upon request by mail to Groeb Farms, Inc. Balloting Center, c/o, KCC, 2335 Alaska Ave., El Segundo, California, 90245, or (c) upon request by calling the Debtor’s restructuring hotline at 877-725-7539 or (ii) for a fee via PACER at www.mieb.uscourts.gov (a PACER login and password are required to access documents on the Court’s website and can be obtained through the PACER Service Center at www.pacer.psc.uscourts.gov). Copies of the Disclosure Statement and Plan may also be examined by interested parties between the hours of 8:30 a.m. and 4:00 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Eastern District of Michigan, 211 W. Fort St., Detroit, MI 48226.



135820013110100000000022

4. **In the Disclosure Statement Hearing Notice, you were notified that the deadline to file a response or objection the Disclosure Statement and other associated relief was November 15, 2013. Because the Disclosure Statement hearing has been expedited, this deadline has been changed to November 6, 2013.** The Responses and objections, if any, to the approval of the Disclosure Statement or any of the other relief sought by the Debtor in connection with approval of the Disclosure Statement, **must** (i) be in writing, (ii) state the name and address of the objecting or responding party and the amount and nature of the claim or interest of such party, (iii) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be incorporated into the Disclosure Statement to resolve any such objection or response, (iv) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and must be filed so as to be actually received **on or before November 6, 2013** on the following parties: (a) the Clerk of the Bankruptcy Court, 211 W. Fort St., Detroit, MI 48226; (b) Judy A. O'Neill, Esq. and John A. Simon, Esq., Foley & Lardner LLP, One Detroit Center, 500 Woodward Avenue, Suite 2700, Detroit, MI 48226; (c) Joe Mack, Esq. and Kelley Callard, Esq., Office of the United States Trustee, 211 West Fort Street, Suite 700, Detroit, MI 48226; (d) Counsel to the Debtor's DIP Lender, Ray Schrock, Esq., Kirkland & Ellis, LLP, 601 Lexington Avenue New York, NY 10022, and Jeffrey Pawlitz, Esq., Kirkland & Ellis, LLP, 300 North LaSalle, Chicago, IL 60654, and Robert Hertzberg, Esq., Pepper Hamilton LLP, 4000 Town Center, Suite 1800, Southfield, MI 48075; and (e) Counsel the Committee of Unsecured Creditors, Bradford J. Sandler, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801 and Sheryl Toby, Dykema Gossett PLLC, 39577 Woodward Avenue, Suite 300, Bloomfield Hills, Michigan 48304.

5. **IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.**

6. Upon approval of the Disclosure Statement by the Bankruptcy Court, holders of Claims against the Debtors who are entitled to vote on the Plan will receive a copy of the Disclosure Statement, the Plan, and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

**If you have any questions related to this notice,
please call the Debtors' bankruptcy hotline at (888) 251-2914.**

Please note that KCC is not authorized to provide, and will not provide, legal advice.

Dated: Detroit, Michigan
November 1, 2013

By: /s/ Tamar N. Dolcourt
FOLEY & LARDNER LLP
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