

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

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In re:

GROEB FARMS, INC.

Debtor.

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) Chapter 11

) Case No. 13-58200

) Honorable Walter Shapero

**SUPPLEMENTAL CERTIFICATE OF SERVICE**

I, Robert D. Tomasch, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the proposed claims and noticing agent for the Debtor in the above-captioned case.

On November 6, 2013, at my direction and under my supervision, employees of KCC caused to be served the following documents via First Class mail on the service list attached hereto as **Exhibit E**:

- **Notice of Deadline for Filing Proof of Claim or Interests** [Attached hereto as **Exhibit A**]
- **(Customized) Proof of Claim Form**
- **Order Granting Ex Parte Motion to Limit Notice and Establish Notice Procedures** [Docket No. 40]
- **Corrected Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors, & Deadlines** [Docket No. 64]
- **Notice of Filing of Debtor's Schedules and Statement of Financial Affairs** [Attached hereto as **Exhibit B**]
- **Notice of Hearing on Disclosure Statement for the Plan of Reorganization of Groeb Farms, Inc. Pursuant to Chapter 11 of the Bankruptcy Code Dated October 1, 2013; to be Held on November 21, 2013 at 1:30 p.m.** [Docket No. 127]
- **Debtor's Motion Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, for an Order Authorizing but not Obligating the Debtor to Honor Programs for Buying Groups and Sales Brokers** [Docket No. 129]
- **Notice of Expedited Disclosure Statement Hearing** [Attached hereto as **Exhibit C**]
- **Notice of Continued Section 341 Meeting of Creditors** [Attached hereto as **Exhibit D**]

/s/ Robert D. Tomasch

Robert D. Tomasch

KCC

2335 Alaska Ave



# **EXHIBIT A**

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

In re:

GROEB FARMS, INC.,

Case No.

Debtor.

Hon.

Chapter 11

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

PLEASE TAKE NOTICE that on October 4, 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: October 4, 2013

BY ORDER OF THE UNITED STATES BANKRUPTCY  
COURT

## **EXHIBIT B**

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

In re:

GROEB FARMS, INC.,

Debtor.

Case No. 13-58200

Hon. Walter Shapero

Chapter 11

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

PLEASE TAKE NOTICE that on October 4, 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 filing of the Debtor's Schedules and Statement of Financial Affairs on or before October 15, 2013. On October 15, 2013, the Debtor filed its Schedules and Statement of Financial Affairs. The Schedules and Statement of Financial Affairs may be viewed free of charge at [www.kccllc.net/groebfarms](http://www.kccllc.net/groebfarms).

**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: October 16, 2013

BY ORDER OF THE UNITED STATES  
BANKRUPTCY COURT

/s/ Judy A. O'Neill  
Judy A. O'Neill (P32142)  
John A. Simon (P61866)  
Tamar N. Dolcourt (P73425)  
Foley & Lardner LLP  
One Detroit Center  
500 Woodward Ave., Suite 2700  
Detroit, MI 48226-3489  
(313) 234-7100 (Telephone)  
(313) 234-2800 (Facsimile)  
*Counsel for the Debtor and Debtor in  
Possession*

# **EXHIBIT C**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

In re:

GROEB FARMS, INC.

Debtor.

Chapter 11

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](http://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](http://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](http://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.



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*

# **EXHIBIT D**

**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
	)	

**NOTICE OF CONTINUED SECTION 341 MEETING OF CREDITORS**

PLEASE TAKE NOTICE that the Meeting of Creditors which occurred on October 29, 2013 will be continued to **November 19, 2013 at 1:00 p.m.** at 211 West Fort Street, Room 315E, Detroit, MI 48226.

Dated: October 29, 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 E**

**Exhibit E**  
**First Class Mail**  
**Additional Matrix Party**

COMPANY	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP
WATERS TECHNOLOGIES CORPORATION	ATTN LORENE BOUCHER	34 MAPLE ST	MILFORD	MA	01757