

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	Case No. 23-10786 (CTG)
KDC AGRIBUSINESS LLC, <i>et al.</i> ,)	(Jointly Administered)
)	Obj. Deadline: Nov. 28, 2023 at 12:00 p.m. (ET)
Debtors. ¹)	Hearing Date: Nov. 29, 2023 at 1:00 p.m. (ET)

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on November 15, 2023, the debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Emergency Motion of Debtors For Entry of an Order (I) Converting the Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code, (II) Establishing a Bar Date for the Filing of Final Fee Applications for Chapter 11 Professionals and Setting a Hearing Thereon, and (III) Granting Related Relief* [Docket No. 478] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, on November 16, 2023, the Debtors also filed a motion to shorten the notice and objection periods with respect to the Motion [Docket No. 481] (the “**Motion to Shorten**”) and, on November 16, 2023, the Court entered an order [Docket No. 488] (the “**Order Shortening Notice**”) shortening the notice and objection periods with respect to the Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order Shortening Notice: (i) a hearing to consider the Motion will be held on **November 29, 2023 at 1:00 p.m. (ET)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801, and (ii) any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **November 28, 2023 at 12:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 16, 2023
Wilmington, Delaware

/s/ Brendan J. Schlauch
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 Paul N. Heath (No. 3704)
 Brendan J. Schlauch (No. 6115)
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Counsel to the Debtors

¹ The debtors and debtors in possession in these cases and the last four digits of their respective Employer Identification Numbers are: KDC Agribusiness LLC (2280), Do Good Chicken LLC (1523), Do Good Foods Facility Management LLC (3974), Do Good Foods Fort Wayne LLC (6909), Do Good Foods LLC (9976), Do Good Foods Managed Services LLC (4214), Do Good Foods Selma LLC (3776) and KDC Agribusiness Fairless Hills LLC (8680) (“**Fairless Hills**”). The debtors’ mailing address, other than Fairless Hills, is 1545 US Highway 206, Suite 100, Bedminster, New Jersey 07921. The mailing address of Fairless Hills is 250 Canal Road, Fairless Hills, Pennsylvania 19030.

