

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TRITEK INTERNATIONAL INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10520 (TMH)
)
) (Jointly Administered)
)
) **Hearing Date: May 25, 2023 at 2:00 p.m. (ET)**
) **Objection Deadline: May 18, 2023 at 4:00 p.m. (ET)**
)
) **Re: Docket Nos. 45, 46, 47, 48, 49, 50 & 51**

**OMNIBUS NOTICE OF SECOND DAY HEARING
TO BE HELD ON MAY 25, 2023 AT 2:00 P.M. (ET)**

PLEASE TAKE NOTICE that, on April 27, 2023 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions (the “Petitions”) for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, the following motions (collectively, the “First Day Motions”) were approved on an interim basis [Docket Nos. 45 - 51] and will be heard on a final basis at a hearing scheduled for **May 25, 2023 at 2:00 p.m. (ET)** (the “Second Day Hearing”) before the Honorable Thomas M. Horan, United States Bankruptcy Judge, at the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801 (the “Court”):

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Trittek International Inc. (7919); HyLife Foods Windom, LLC (5391); and Canwin Farms, LLC (3973). Debtors’ mailing address is 2850 Highway 60 East, Windom, MN 56101.

1. **Utilities Motion:** Motion of Debtors for Interim and Final Order (I) Determining Adequate Assurance of Payment for Future Utility Services; (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services; (III) Establishing Procedures for Determining Requests for Further Adequate Assurance of Payment; and (IV) Granting Related Relief [Docket No. 6]
2. **Wages Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations; and (II) Granting Related Relief [Docket No. 7]
3. **Taxes Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Taxes and Fees; and (II) Granting Related Relief [Docket No. 8]
4. **Insurance Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (C) Maintain the Surety Bonds; (II) Modifying the Automatic Stay with Respect to the Workers' Compensation Program; and (III) Granting Related Relief [Docket No. 9]
5. **Critical Vendors Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Suppliers, Logistics Claimants, PASA Claimants and Section 503(b)(9) Claimants; and (II) Granting Related Relief [Docket No. 10]
6. **Customer Programs Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Continue Their Customer Programs and Honor Prepetition Obligations Related Thereto; and (II) Granting Related Relief [Docket No. 11]
7. **Cash Management Motion:** Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Using Existing Cash Management Systems, Bank Accounts and Business Forms and (B) Implement Changes to Their Cash Management Systems in the Ordinary Course of Business; (II) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b); and (III) Granting Related Relief [Docket No. 12]

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions must comply with the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware. Objections, if any, to the First Day Motions must be filed with the Court and served upon each of

the parties set forth below on or before **May 18, 2023 at 4:00 p.m. (ET)**: (i) counsel for Debtors, Katten Muchin Rosenman LLP, 50 Rockefeller Plaza, New York, NY 10020, Attn: Jerry L. Hall, Esq. (jerry.hall@katten.com); (ii) proposed Delaware counsel to Debtors, Potter Anderson & Corroon LLP, Hercules Plaza, 1313 North Market Street, 6th Floor, Wilmington DE, 19801, Attn: Jeremy Ryan, Esq. (jryan@potteranderson.com); (iii) counsel for the agent under Debtors' prepetition credit facility, Stinson LLP, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402, Attn: Adam Nathe (adam.nathe@stinson.com) and Edwin H. Caldie (ed.caldie@stinson.com) and Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, DE 19801, Attn: Matthew Ward (matthew.ward@wbd-us.com); (iv) counsel to Debtors' equity investors, Squire Patton Boggs, 2550 M Street, NW, Washington, DC 20037, Attn: Christopher J. Giaimo (christopher.giaimo@squirepb.com) and Latham & Watkins LLP, 555 Eleventh Street, NW, Suite 1000, Washington, D.C., 20004, Attn: Andrew Sorkin (andrew.sorkin@lw.com); (v) counsel to any statutory committee appointed in these Chapter 11 Cases; and (vi) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Richard Schepacarter (richard.schepacarter@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions and the interim orders entered with respect to the First Day Motions, which are served herewith, can be obtained through the Court's website at <https://ecf.deb.uscourts.gov>, referencing Case No. 23- 10520 (TMH), and on the website of the Debtors' notice and claims agent, Donlin Recano & Company, Inc. at <https://www.donlinrecano.com/Clients/hfw/Index>.

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the

adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtors will file an agenda before the Second Day Hearing, which may modify or supplement the motions and applications to be heard at the Second Day Hearing.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Second Day Hearing if you do not object to the relief requested in the First Day Motions.

PLEASE TAKE FURTHER NOTICE THAT IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEW ON THE FIRST DAY MOTIONS, THEN YOU OR YOUR ATTORNEY MUST TIMELY FILE AND SERVE AN OBJECTION AND ATTEND THE SECOND DAY HEARING. IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE FIRST DAY MOTIONS AND MAY ENTER ORDERS GRANTING THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS.

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Dated: April 28, 2023
Wilmington, Delaware

Jerry L. Hall (admitted *pro hac vice*)
Michael E. Comerford (admitted *pro hac vice*)
Jesse A. Kitnick (admitted *pro hac vice*)
KATTEN MUCHIN ROSENMAN LLP
50 Rockefeller Plaza
New York, NY 10020
Telephone: (212) 940-8800
Facsimile: (212) 940-8776
Email: jerry.hall@katten.com
michael.comerford@katten.com
jesse.kitnick@katten.com

Allison E. Yager (admitted *pro hac vice*)
Kenneth N. Hebeisen (admitted *pro hac vice*)
KATTEN MUCHIN ROSENMAN LLP
525 W. Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Facsimile: (312) 902-1061
Email: allison.yager@katten.com
ken.hebeisen@katten.com

Respectfully submitted,

/s/ R. Stephen McNeill

Jeremy W. Ryan (No. 4057)
L. Katherine Good (No. 5101)
R. Stephen McNeill (No. 5210)
Sameen Rizvi (No. 6902)
POTTER ANDERSON & CORROON LLP
1313 N. Market Street, 6th Floor
Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: jryan@potteranderson.com
kgood@potteranderson.com
rmcneill@potteranderson.com
srizvi@potteranderson.com

Yelena E. Archiyan (admitted *pro hac vice*)
KATTEN MUCHIN ROSENMAN LLP
2121 N. Pearl Street, Suite 1100
Dallas, TX 75201
Telephone: (214) 765-3600
Facsimile: (214) 765-3602
Email: yelena.archiyan@katten.com

*Proposed Counsel to Debtors
and Debtors in Possession*