IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

)	
In re:)	Chapter 11
)	
TRITEK INTERNATIONAL INC., et al., 1)	Case No. 23-10520 (TMH)
)	
Debtors.)	(Joint Administration Requested)
)	

AMENDED² NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) AGENDA FOR HYBRID HEARING ON FIRST DAY MOTIONS SCHEDULED FOR APRIL 28, 2023 AT 1:30 P.M. (ET)³

THE HEARING WILL BE CONDUCTED IN-PERSON AND BY ZOOM.
PARTICIPANTS APPEARING BY ZOOM ARE REQUIRED
TO REGISTER IN ADVANCE OF THE HEARING.

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

https://debuscourts.zoomgov.com/meeting/register/vJItcuyhqjwsEmJv59BdBUQv6POHjbf9hrQ

ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.

PLEASE TAKE NOTICE that on April 27, 2023, the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the following voluntarily petitions (the "<u>Petitions</u>") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

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

² Amended items appear in bold.

All motions and other pleadings referenced herein are available online at the following address: www.donlinrecano.com/tritek.

A. <u>Voluntary Petitions</u>:

- 1. Tritek International Inc. [Case No. 23-10520]
- 2. HyLife Foods Windom, LLC [Case No. 23-10521]
- 3. Canwin Farms, LLC [Case No. 23-10522]

PLEASE TAKE FURTHER NOTICE that on April 27, 2023, in addition to the filing of the petitions, the Debtors filed the following first day motions and related pleadings (collectively, the "First Day Motions").

B. <u>First Day Motions</u>:

- 4. Motion of Debtors for an Order Directing the Joint Administration of Debtors' Chapter 11 Cases [Docket No. 3 filed April 27, 2023]
- 5. Application of Debtors for Order (I) Authorizing the Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent to Debtors; and (II) Granting Related Relief [Docket No. 4 filed April 27, 2023]
- 6. Motion of Debtors for an Order (I) Authorizing Debtors to Redact Certain Personally Identifiable Information for Individual Creditors; and (II) Granting Related Relief [Docket No. 5 filed April 27, 2023]
- 7. 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 file April 27, 2023]
- 8. 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 filed April 27, 2023]
- 9. 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 filed April 27, 2023]
- 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 filed April 27, 2023]

- 11. 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 filed April 27, 2023]
- 12. 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 filed April 27, 2023]
- 13. 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 filed April 27, 2023]
- 14. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Junior Liens and Administrative Expense Status; (III) Authorizing the Use of Cash Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 22 filed April 27, 2023]
 - i. Notice of Filing of Correction to Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Junior Liens and Administrative Expense Status; (III) Authorizing the Use of Cash Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 37 filed April 27, 2023]
 - ii. Notice of Revised Proposed Interim Order: (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Junior Liens and Administrative Expense Status; (III) Authorizing the Use of Cash Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Forthcoming]

C. First Day Declarations:

- 15. Declaration of Grant Lazaruk in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 13 filed April 27, 2023]
- 16. Declaration of Lorie Beers in Support of Motion of Debtors for Interim and Final Order (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Junior Liens and Administrative Expense Status; (III) Authorizing the Use of Cash

- Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 23 filed April 27, 2023]
- 17. Declaration of Brian Koluch in Support of Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Junior Liens and Administrative Expense Status; (III) Authorizing the Use of Cash Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 24 filed April 27, 2023]

PLEASE TAKE FURTHER NOTICE that a hybrid hearing with respect to the First Day Motions is scheduled for April 28, 2023 at 1:30 p.m. (ET) at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801 before The Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware. Parties who wish to participate in the First Day Hearing remotely may do so by joining the Zoom hearing at the following link https://debuscourts.zoomgov.com/meeting/register/vJItcuyhqjwsEmJv59BdBUQv6POHjbf9hrQ.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

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Dated: April 28, 2023

Wilmington, Delaware

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Jesse A. Kitnick (pro hac vice pending)

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Respectfully submitted,

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