

1 4

2 Zev Shechtman (Bar No. 266280)
3 *zev.shechtman@saul.com*

4 Steven F. Werth (Bar No. 205434)
5 *steven.werth@saul.com*

6 Mariam Khoudari (Pro hac admission pending)
7 *mariam.khoudari@saul.com*

8 **SAUL EWING LLP**
9 1888 Century Park East, Suite 1500
10 Los Angeles, California 90067
11 Telephone: (310) 255-6100
12 Facsimile: (310) 255-6200

13 Proposed Attorneys for Hronis, Inc. and
14 affiliated Debtors and Debtors in Possession

15 **UNITED STATES BANKRUPTCY COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**
17 **FRESNO DIVISION**

18 In re

19 **HRONIS, INC.**, a California corporation, et
20 al.,¹

21 Debtors in Possession

Case No. 1:26-bk-10978

Chapter 11

DC Nos.: SE-1, SE-2, SE-3, SE-4, SE-5, SE-
6, SE-7, SE-8, SE-9, SE-10

**OMNIBUS NOTICE OF DEBTORS’
FIRST DAY MOTIONS**

Hearing:

Date: March 11, 2026
Time: 11:00 a.m. Pacific Time
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13 (5th Floor)
Judge: Hon. René Lastreto II

22
23
24
25
26 ¹ The ten Debtors subject to the Court’s approval of their motions for joint administration are: Hronis, Inc.; Hronis
27 Capital Assets, LP, a California limited partnership; Hronis Capital Management, LLC, a California limited liability
28 company; Hronis Citrus, LLC, a California limited liability company; Hronis Farming, LP, a California limited
partnership; Hronis Fruit Company LLC, a California limited liability company; Hronis Land Company, a California
general partnership; Hronis Ranch, LLC, a California limited liability company; Hronis Resource Management, LLC,
a California limited liability company; and The Hronis Family Limited Partnership, a California limited partnership.

SAUL EWING LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100

1 **PLEASE TAKE NOTICE THAT** the Honorable René Lastreto II, United States
2 Bankruptcy Judge for the Eastern District of California, Fresno Division, has scheduled a hearing
3 (the “First Day Hearing”) on March 11, 2026, at 11:00 a.m. Pacific Time in Courtroom 13 located
4 at the Robert E. Coyle United States Courthouse, Fifth Floor, 2500 Tulare Street, Fresno,
5 California 93721, to consider the “first day” motions (the “First Day Motions”) filed by Hronis,
6 Inc. and affiliated debtors and debtors in possession (the “Debtors”):

7 1. *Motion for Order Directing Joint Administration of Related Cases* (SE-1), filed in
8 the above-captioned proposed lead case and the nine proposed jointly administered cases;

9 2. *Motion for Order: (1) Deeming Utility Companies Adequately Assured of Future*
10 *Performance; (2) Establishing Procedures for Requests for Additional Assurance; (3) Restraining*
11 *Utility Companies from Discontinuing, Altering, or Refusing Service; and (4) Providing For*
12 *Related Relief* (SE-2);

13 3. *Motion for Order Authorizing Debtors to Maintain Bank Accounts and Cash*
14 *Management System* (SE-3);

15 4. *Motion for Order: (1) Limiting Notice; and (2) Authorizing Service by Electronic*
16 *Mail* (SE-4);

17 5. *Motion for Order Authorizing Debtors to File Consolidated List of Creditors and*
18 *Consolidated List of Debtors’ Thirty Creditors Holding Largest Unsecured Claims* (SE-5);

19 6. *Motion for Order Extending Time to File Schedules, Statements and Related*
20 *Papers by Fourteen Days* (SE-6);

21 7. *Motion for Order Authorizing Debtors to (A) Pay Certain Prepetition Benefits, and*
22 *Other Compensation, and (B) Continue Employee Compensation and Employee Benefits*
23 *Programs* (SE-7);

24 8. *Motion for Order Pursuant to Local Bankruptcy Rule 9037-1 Authorizing the*
25 *Debtors to Redact Certain Personally Identifiable Information of the Debtors’ Employees* (SE-8);

26 9. *Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain*
27 *Senior Secured Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Provide*
28 *Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Certain*

1 *Prepetition Secured Parties; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing;*
2 *and (V) Granting Related Relief (SE-9); and*

3 10. *Application for Order Appointing Donlin, Recano & Company, LLC as Claims and*
4 *Noticing Agent (SE-10).*

5
6 **PLEASE TAKE FURTHER NOTICE THAT** the Debtors filed each of the First Day
7 Motions with an accompanying memorandum of points and authorities and supporting evidence
8 pursuant to Local Bankruptcy Rule 9014-1. The Debtors have also filed the *Omnibus Declaration*
9 *of Allen Soong in Support of First Day Motions* contemporaneously with and in support of all of
10 the First Day Motions. Complete copies of all of the First Day Motions, supporting documents,
11 and all other filings in these cases may be obtained by emailing Debtors’ above-captioned counsel
12 or from the Court’s docket, which is accessible to all parties on the website of the Debtors’
13 proposed claims and noticing agent: <https://bankruptcy.angeiongroup.com/hronis>.

14
15 **PLEASE TAKE FURTHER NOTICE THAT** parties may appear at the Hearing in
16 person at the above-captioned Courthouse, or by *ZoomGov* videoconference using the following
17 procedures and guidelines:

18
19 [Procedures and Guidelines Governing Video and Telephonic Appearances Via Zoom \(rev.](#)
20 [Fe. 2024\)](#).

21
22 Parties who intend to appear via *ZoomGov* must sign up through the Court’s website:
23 <https://www.caeb.uscourts.gov/Judges/Lastreto>. The hearing information may be updated prior to
24 the hearing. The “ZoomGov Sign Up” link for the hearing will be available on the right side of
25 the webpage for the March 11, 2026, 11:00 a.m. Calendar below “Currently Scheduled Hearings.”
26
27
28

SAUL EWING LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PLEASE TAKE FURTHER NOTICE THAT parties in interest are not required to file written oppositions to the First Day Motions. Opposition, if any, may be presented at the First Day Hearing.

Dated: March 9, 2026

SAUL EWING LLP

By: /s/ Zev Shechtman
Zev Shechtman
Proposed Attorneys for Hronis, Inc. and
affiliated Debtors and Debtors in Possession

SAUL EWING LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100