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Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

TRINITAS ADVANTAGED
AGRICULTURE PARTNERS IV, LP *et al.*,¹
Debtors.

Case No. 24-50211 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF FILING OF REVISED
AUCTION-RELATED DATES UNDER
BID PROCEDURES ORDER**

Date: June 14, 2024

Time: 10:00 a.m. (Pacific Time)

Place: **Tele/Videoconference Appearances**
Only, United States Bankruptcy Court,
Courtroom 17, 16th Floor,
San Francisco, CA 94102

¹ The last four digits of Trinitas Advantaged Agriculture Partners IV, LP's tax identification number are 3730. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.donlinrecano.com/trinitas>. The Debtors' service address is 2055 Woodside Road, Suite 195, Redwood City, CA 94061.

1 **TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED**
 2 **STATES TRUSTEE, ALL QUALIFIED BIDDERS WHO TIMELY SUBMITTED BIDS,**
 3 **AND OTHER PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that on February 19, 2024 (the "Petition Date"),
 5 Trinitas Advantaged Agriculture Partners IV, LP; Trinitas Farming, LLC; Dixon East LLC; Turf
 6 Ranch LLC; Rasmussen LLC; Johl LLC; Chiala LLC; Hall Ranch LLC; Dinuba Ranch, LLC;
 7 Porterville LLC; Tule River Ranch, LLC; Jeffrey Ranch, LLC; Toor Ranch, LLC; Lamb Ranch,
 8 LLC; Fry Road, LLC; Adobe Ranch, LLC; Marcucci Ranch, LLC; Ratto Ranch, LLC; and Phelps
 9 Ranch, LLC (collectively, the "Debtors"), as debtors and debtors in possession in the
 10 above-captioned chapter 11 cases (the "Chapter 11 Cases"), each filed a voluntary petition for
 11 relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the
 12 United States Bankruptcy Court for the Northern District of California (the "Bankruptcy Court").

13 **PLEASE TAKE FURTHER NOTICE** that, on April 29, 2024, the Court entered
 14 the *Order (A) Authorizing and Approving Bid Procedures, (B) Approving Procedures Related to*
 15 *the Assumption of Certain Executory Contracts and Unexpired Leases, (C) Approving the Notice*
 16 *Procedures, (D) Authorizing Entry into One or More Stalking Horse Agreements, and (E) Setting*
 17 *a Date for the Sale Hearing* (the "Bid Procedures Order") [Dkt. No. 248].²

18 **PLEASE TAKE FURTHER NOTICE** that the Debtors, in consultation with
 19 Rabo Ag and the Committee (each of whom have agreed to the revised dates and deadlines as set
 20 forth herein), have modified certain dates and deadlines relating to the Auction that are set forth in
 21 the Bid Procedures Order, as permitted under the Bid Procedures Order. The modified dates for
 22 the Auction and related deadlines have been attached hereto as **Exhibit A**. Except as modified in
 23 Exhibit A, all dates and other provisions in the Bid Procedures Order are unchanged.

24 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings in these
 25 Chapter 11 Cases can be viewed and/or obtained by: (i) accessing the Court's website at
 26 <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden
 27 Gate Avenue., 5th Floor, San Francisco, California 94102, or (iii) from the Debtors' notice and
 28 claims agent, Donlin, Recano & Company, Inc. at the following web address:
<https://www.donlinrecano.com/trinitas>, or by calling the restructuring information center at
 1 (800) 780-7386 (toll free) for U.S. and Canada-based parties or 1 (212) 771-1128 for
 International parties, or by submitting an inquiry via e-mail to tfinfo@drc.equiniti.com.

Note that a PACER password is needed to access documents on the Court's website.

Dated: May 21, 2024

KELLER BENVENUTTI KIM LLP

By: /s/ Jane Kim

Jane Kim

*Attorneys for Debtors and Debtors in
 Possession*

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Bid Procedures Motion.

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Exhibit A
Modified Dates and Deadlines

| Event | Original Date or Proposed Date | Revised Calendar Date (in bold if new) | Deadline |
|--|--|---|--|
| Qualified Bid and Parcel Lists Deadline | May 23, 2024 4:00 p.m. (PT) | May 29, 2024 4:00 p.m. (PT) | Deadline by which the Debtors will provide the Consultation Parties with: (a) a list of all Qualified Bids, broken down by the parcels of Property to which the respective bids are qualified; (b) a list of the specific parcels of Property that the Debtors intend to submit for bidding at Auction; and (c) a list of the specific parcels of Property that will not be subject to Auction. |
| Credit Bid Election Deadline | May 23, 2024 4:00 p.m. (PT) | May 29, 2024 4:00 p.m. (PT) | Deadline by which Rabo Ag shall notify the Debtors and the Committee of its election to credit bid at the Auction. |
| Pre-Auction Committee Objection Deadline | May 27, 2024 | June 3, 2024 | Deadline by which the Committee may file an objection to (a) Rabo Ag's Credit Bid Notice and Rabo Ag's right to credit bid as notified therein in accordance with paragraph 4; (b) the Debtor's decision to enter into a Stalking Horse Bid and any terms thereof; (c) the portions of the Property that the Debtors intend to offer at the Auction; or (d) the timing, and to seek an extension, of the Bid Deadline, the Auction, and/or the Sale Hearing. |
| Starting Bid Notice Deadline | May 29, 2024 | June 5, 2024 | The Debtors will provide to all Qualified Bidders participating in the Auction a Starting Bid Notice stating the Starting Bid and the bidding increments for each lot. |
| Pre-Auction Hearing (if necessary) | May 29, 2024 10:00 a.m. (PT) (subject to Court's availability) | June 5, 2024 11:30 a.m. (PT) | Hearing on the Pre-Auction Committee Objection (if any). |
| Auction (if necessary) | May 30, 2024 11:00 a.m. (PT) | June 6, 2024 11:00 a.m. (PT) | Date on which the Debtors will begin the Auction. |

| Event | Original Date or Proposed Date | Revised Calendar Date (in bold if new) | Deadline |
|-------------------------|---|---|--|
| Auction Results Notice | June 3, 2024 (or one business day after the conclusion of the Auction) | June 7, 2024 (or one business day after the conclusion of the Auction) | Date by which the Debtors will serve notice of the results of the Auction to all Qualified Bidders, the Creditors' Committee, Rabo Ag, and all other parties who have timely elected to receive notices related to the sale process. |
| Sale Objection Deadline | June 7, 2024 4:00 p.m. (PT) | June 10, 2024 4:00 p.m. (PT) | Deadline by which Sale Objections must be filed with the Court and served so as to be actually received by the Objection Notice Parties. |
| Sale Reply Deadline | June 12, 2024 | June 13, 2024 12:00 p.m. (PT) | Deadline by which the Debtors and/or the Successful Bidder(s) will file and serve their reply, if any, in support of the Sale Motion. |
| Sale Hearing | June 14, 2024 10:00 a.m. (PT) | June 14, 2024 10:00 a.m. (PT) | Date for the hearing to consider approval of the Sale pursuant to section 363 of the Bankruptcy Code. |
| Sale Order Deadline | Within 3 business days following the Sale Hearing | Within 3 business days following the Sale Hearing | Date by which the Court shall have entered the Sale Order, pursuant to the DIP Credit Agreement. |