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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11
12 In re:

13 TRINITAS FARMING, LLC, *et al.*,¹
14 Debtors.

Case No. 24-50210 (DM) (Lead Case)

Chapter 11

(Joint Administration Requested)

15 **NOTICE OF HEARING ON FIRST**
16 **DAY MOTIONS AND**
17 **APPLICATIONS**

18 Date: February 22, 2024

Time: 1:30 p.m. (Pacific Time)

19 Place: **Tele/Videoconference**

Appearances Only

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

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26 ¹ The last four digits of Trinitas Farming, LLC's tax identification number are 8883. Due to the
27 large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the
28 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' proposed claims and
noticing agent at <https://www.donlinrecano.com/trinitas>. The Debtors' service address is 1414
East F Street A-102, Oakdale, California 95361.

1 **TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED**
2 **STATES TRUSTEE, AND OTHER PARTIES IN INTEREST:**

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

9 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court has scheduled
a hearing (the "First Day Hearing") for February 22, 2024, at 1:30 p.m. (Prevailing Pacific Time),
before the Honorable Dennis Montali, United States Bankruptcy Judge. **The First Day Hearing**
10 **shall be conducted by video or teleconference only.** The Bankruptcy Court's website provides
information regarding how to arrange an appearance at a video or telephonic hearing. If you have
11 questions about how to participate in a video or telephonic hearing, you may contact the court by
calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website at
12 www.canb.uscourts.gov.

13 **PLEASE TAKE FURTHER NOTICE** that any responses or oppositions to the
14 First Day Motions may be made at the First Day Hearing.

15 **PLEASE TAKE FURTHER NOTICE** that at the First Day Hearing, the Court
will hear the motions and applications filed by the Debtors listed in Section I of **Exhibit A** attached
16 hereto. The Debtors also filed certain applications on the Petition Date, listed in Section II of
Exhibit A attached hereto, as to which no hearing is required. Copies of each pleading identified
17 on Exhibit A can be viewed and/or obtained by: (i) accessing the Court's website at
<http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden
18 Gate Avenue., 5th Floor, San Francisco, California 94102, or (iii) from the Debtors' proposed
notice and claims agent, Donlin, Recano & Company, Inc. at the following web address:
19 <https://www.donlinrecano.com/trinitas>, or by calling the restructuring information center at
20 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.

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

23 Dated: February 20, 2024

KELLER BENVENUTTI KIM LLP

24
25 By: /s/ Jane Kim

26 Jane Kim

27 *Proposed Attorneys for Debtors and*
28 *Debtors in Possession*

1 **EXHIBIT A**

2 **MOTIONS AND APPLICATIONS FILED ON THE PETITION DATE²**

3 **II. Motions to Be Heard at the First Day Hearing**

4 **A. Administrative Motions**

- 5 7. Joint Administration Motion. Motion of Debtors for Entry of an
6 Order (I) Directing the Joint Administration of the Debtors' Chapter
7 11 Cases and (II) Granting Certain Related Relief
[Docket No. 5].
- 8 8. Creditor Matrix and Notice of Commencement Motion. Motion of
9 Debtors for Entry of Order (I) Authorizing the Debtors to
10 (A) File a Consolidated List of Creditors in Lieu of Submitting a
11 Separate Mailing Matrix for Each Debtor, and (B) File a
12 Consolidated List of the Debtors' Thirty Largest Unsecured
Creditors; (II) Implementing Certain Procedures for the Notice of
13 Commencement; and (III) Granting Related Relief [Docket No. 6].
- 14 9. Motion to Extend Time to File Statements and Schedules. Motion
15 of Debtors Pursuant to 11 U.S.C. §§ 521(a) and 105(a) and Fed. R.
Bankr. P. 1007(c) for Entry of an Order Extending Time to File
Schedules of Assets and Liabilities and Statements of Financial
Affairs [Docket No. 7].

16 **B. Substantive Motions**

- 17 4. Cash Management Motion. Motion of the Debtors Pursuant to 11
18 U.S.C. §§ 105, 363, and 503(b) for Interim and Final Orders
19 (I) Approving Continued Use of the Debtors' Cash Management
System and Bank Accounts; (II) Authorizing the Debtors to Open
20 and Close Bank Accounts; and (III) Authorizing Banks to Honor
Certain Prepetition Transfers [Docket No. 8].
- 21 5. Taxes Motion. Motion of the Debtors Pursuant to 11 U.S.C.
22 §§ 105, 363, and 507(a), and 541(d), and Fed. R. Bankr. P. 6003 and
23 6004 for Interim and Final Authority to Pay Certain Prepetition
Taxes and Assessments and Granting Related Relief [Docket No. 9].
- 24 6. Utilities Motion. Motion of the Debtors Pursuant to 11 U.S.C.
25 §§105(a) and 366 for Interim and Final Orders Establishing
26 Adequate Assurance Procedures with Respect to the Debtors' Utility
Providers [Docket No. 10].

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28 ² Docket entry numbers are in reference to Case Number 24-50210.

- 1 7. DIP Financing Motion. Motion of the Debtors for Interim and Final
2 Orders (I) Authorizing the Debtors to Obtain Senior Secured,
3 Superpriority, Postpetition Financing; (II) Granting Liens and
4 Superpriority Claims; (III) Authorizing the Use of Cash Collateral;
5 (IV) Modifying the Automatic Stay; (V) Setting a Final Hearing;
6 and (VI) Granting Related Relief [Docket No. 14]

7 **III. Applications as to which No Hearing is Required**

- 8 8. Retention Application for Claims and Noticing Agent. Application
9 of Debtors Pursuant to 28 U.S.C. § 156(c) and
10 11 U.S.C. §§ 105(a) and 503(b) for Entry of an Order Appointing
11 Donlin, Recano & Company, Inc. as Claims and Noticing Agent
12 Effective as of the Petition Date [Docket No. 12].
- 13 9. Application to Appoint Responsible Individual. Application of
14 Debtors Pursuant to B.L.R. 4002-1 For Order Appointing Kirk
15 Hoiberg as Responsible Individual [Docket No. 11]