

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
TREESAP FARMS, LLC, <i>et al.</i> ,	§	
	§	Case No. 25-90017 (ARP)
Debtors. ¹	§	
	§	(Joint Administration Requested)
	§	

**AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED
FOR FEBRUARY 25, 2025, AT 2:00 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file this agenda for matters set for hearing on **February 25, 2025, at 2:00 p.m. (prevailing Central Time)**.

AGENDA MATTERS

I. Evidentiary Support for First Day Pleadings

1. **First Day (Saperstein) Declaration.** *Declaration of Jonathan A. Saperstein in Support of Chapter 11 Petitions and First Day Pleadings.* [Docket No. 14]
2. **First Day (Jacobs) Declaration.** *Declaration of Bret Jacobs, Chief Restructuring Officer, in Support of Chapter 11 Petitions and First Day Pleadings.* [Docket No. 15]
3. **DIP Declaration.** *Declaration of Douglas McDonald in Support of the Debtors’ Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, and (B) Use Cash Collateral; (II) Granting Senior Secured Priming Liens and Superpriority Administrative Expense Claims; (III) Granting Adequate Protection to Prepetition Lenders; (IV) Modifying the Automatic Stay; (V) Scheduling Final Hearing; and (VI) Granting Related Relief.* [Docket No. 17]

¹ The Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers are as follows: TreeSap Farms, LLC (5183); TSH Opco, LLC (4697); TSV Opco, LLC (5418); TSV Reco, LLC (4953); and TreeSap Florida, LLC (5331). The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is TreeSap Farms, LLC, 5151 Mitchelldale St., Suite B-2, Houston, TX 77092.

4. **Witness and Exhibit List.** *Debtors' Witness and Exhibit List for Omnibus Hearing Schedule for February 25, 2025, at 2:00 p.m. (Prevailing Central Time).* [Docket No. 18]

II. First Day Pleadings

1. **Joint Administration Motion.** *Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief.* [Docket No. 2]

Status: This matter is going forward.

2. **DIP Motion.** *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Senior Secured Priming Liens and Superpriority Administrative Expense Claims; (III) Granting Adequate Protection to Prepetition Lenders, (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief.* [Docket No. 16]

Status: This matter is going forward.

3. **Claims and Noticing Agent Application.** *Emergency Ex-Parte Application for Entry of an Order Authorizing the Employment and Retention Donlin, Recano & Company, LLC as Claims, Noticing, and Solicitation Agent.* [Docket No. 3]

Status: This matter is going forward.

4. **Creditor Matrix Motion.** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated Creditor Matrix and a Consolidated List of the 30 Largest Unsecured Creditors and (B) Redact Certain Personally Identifiable Information of Natural Persons; (II) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases and Other Information; and (III) Granting Related Relief.* [Docket No. 5]

Status: This matter is going forward.

5. **Extension of Time to File Schedules and Statements Motion.** *Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File (A) Schedules and Statements, and (B) Rule 2015.3 Financial Reports, (II) Modifying the Requirements of Bankruptcy Local Rule 2015-3, and (III) Granting Related Relief.* [Docket No. 6]

Status: This matter is going forward.

6. **Insurance Motion.** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Prepetition Insurance Coverage and Satisfy Prepetition Obligations Related Thereto and (B) Renew, Supplement, and Enter Into New Insurance Policies, and (II) Granting Related Relief.* [Docket No. 7]

Status: This matter is going forward.

7. **Cash Management Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Using the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Bank Accounts, Business Forms and Books and Records, and (II) Granting Related Relief. [Docket No. 8]

Status: This matter is going forward.

8. **Employee Wages Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursement Expenses, (B) Continue Employee Benefit Programs (II) Authorizing Current and Former Employees to Proceed with Outstanding Workers' Compensation Claims, and (III) Granting Related Relief. [Docket No. 9]

Status: This matter is going forward.

9. **Tax Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief. [Docket No. 10]

Status: This matter is going forward.

10. **Utilities Motion.** Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief. [Docket No. 11]

Status: This matter is going forward.

11. **Critical Vendor Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Certain Prepetition Obligations in the Ordinary Course of Business and (II) Granting Related Relief. [Docket No. 12]

Status: This matter is going forward.

12. **Customer Programs Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief. [Docket No. 13]

Status: This matter is going forward.

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Houston, Texas

Dated: February 24, 2025

Respectfully submitted,

/s/ S. Margie Venus

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***Proposed Co-Counsel to the Debtors and
Debtors in Possession***

CERTIFICATE OF SERVICE

I certify that on February 24, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ S. Margie Venus

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