

**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)
	§	

NOTICE OF EMERGENCY VIRTUAL HEARING ON FIRST DAY MOTIONS

On February 24, 2025, TreeSap Farms, LLC, and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”) commenced these chapter 11 cases.

In accordance with Sections A and I of the Procedures for Complex Cases in the Southern District of Texas (the “Complex Case Procedures”), a virtual hearing is set for **February 25, 2025 at 2:00 p.m. (prevailing Central Time)** (the “First Day Hearing”) before Judge Alfredo R. Perez of the United States Bankruptcy Court for the Southern District of Texas – Houston Division (the “Court”) to consider the following motions:

- **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]
- **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]
- **First Day Notice of Complex Ch. 11 Case.** *Notice of Designation as Complex Chapter 11 Bankruptcy Case.* [Docket No. 4]
- **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]

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.

- **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]
- **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]
- **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]
- **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]
- **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]
- **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]
- **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]
- **Critical Vendor.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, and (II) Granting Related Relief. [Docket No. 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]

Related Documents:

- **First Day (Saperstein) Declaration.** *Declaration of Jonathan A. Saperstein in Support of Chapter 11 Petitions and First Day Pleadings.* [Docket No. 14]
- **First Day (Jacobs) Declaration.** *Declaration of Bret Jacobs, Chief Restructuring Officer, in Support of Chapter 11 Petitions and First Day Pleadings.* [Docket No. 15]
- **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]
- **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]

The First Day Hearing will be conducted virtually only. No in-person attendance will be permitted. Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Perez's conference room number is 282694. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Perez's homepage. The meeting code is "Judge Perez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of the First Day Hearing. To make your appearance, click the "Electronic Appearance" link on Judge Perez's homepage. Select the case name, complete the required fields, and click "Submit" to complete your appearance.

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Houston, Texas

Dated: February 24, 2025

Respectfully submitted,

/s/ John J. Sparacino

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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/ John J. Sparacino

John J. Sparacino