

**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	§	
	§	(Jointly Administered)
	§	
	§	

**NOTICE OF (A) COMBINED HEARING ON
APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN
AND (B) DEADLINE TO OBJECT TO DISCLOSURE STATEMENT
AND CONFIRMATION OF PLAN**

<p style="text-align:center">YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR RIGHTS MAY BE AFFECTED BY THE PLAN. THEREFORE, YOU SHOULD READ THIS NOTICE CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.</p>

TO: ALL HOLDERS OF CLAIMS AGAINST AND INTERESTS IN TREESAP FARMS, LLC AND ITS AFFILIATED DEBTORS AND DEBTORS IN POSSESSION AND ALL OTHER PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES

PLEASE TAKE NOTICE THAT on May 9, 2025, TreeSap Farms, LLC and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (together, the “Debtors”), filed their initial (i) *Joint Plan of Liquidation of TreeSap Farms, LLC and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 274] (as may be amended, supplemented, or modified from time to time, the “Plan”), and (ii) *Disclosure Statement for Joint Plan of Liquidation of TreeSap Farms, LLC and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No 273] (as may be amended, supplemented, or modified from time to time, the “Disclosure Statement”).² On May 28, 2025, the Bankruptcy Court entered an order [Docket No. 326] that, among other things, approved the Disclosure Statement on a conditional basis and established **June 27, 2025, at 4:00 p.m. (prevailing Central Time)** as the deadline for objecting to the adequacy of the disclosure statement and confirmation of the Plan

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 77292-5279.

² Capitalized terms used but not defined herein have the meanings given to them in the Plan.

(the “Objection Deadline”) and **July 8, 2025 at 9:00 a.m. (prevailing Central Time)** as the date and time of the hearing to consider confirmation of the Plan (the “Combined Hearing”).

If you wish to review the Plan, you may receive a copy of the Plan free of charge from Donlin, Recano & Company, LLC, the balloting agent retained by the Debtors in these chapter 11 cases, by: (i) calling the Debtors’ restructuring hotline at (877) 322-4952 (U.S./Canada Toll Free) or +1 (212) 771-1128 (International); (ii) visiting the Debtors’ restructuring website at: <https://www.donlinrecano.com/tsf>; or (iii) sending an email to tsfinfo@angeiongroup.com with “TreeSap Solicitation Inquiry” in the subject line. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <https://www.txs.uscourts.gov/bankruptcy>. Please be advised that Donlin, Recano & Company, LLC is authorized to answer questions and provide additional copies of solicitation materials but may **not** advise you as to whether you should object to the Plan.

The Bankruptcy Court can confirm the Plan and bind all Holders of Claims and Interests if, after approval of the Disclosure Statement and the solicitation of votes to accept or reject the Plan, it is accepted by the Holders of at least two-thirds in amount and more than one-half in number of the Claims in each Voting Class who vote on the Plan and if the Plan otherwise satisfies the applicable requirements of section 1129(a) of the Bankruptcy Code. If the requisite acceptances are not obtained, the Bankruptcy Court nonetheless may confirm the Plan if it finds that the Plan (a) provides fair and equitable treatment to, and does not unfairly discriminate against, each Class rejecting the Plan and (b) otherwise satisfies the requirements of section 1129 of the Bankruptcy Code. If the Plan is confirmed by the Bankruptcy Court, it will be binding on all Holders of Claims and Equity Interests whether or not a particular Holder was entitled to vote, voted, or affirmatively voted to reject the Plan.

The Combined Hearing to consider the adequacy of the Disclosure Statement on a final basis and confirmation of the Plan will commence on **July 8, 2025, at 9:00 a.m. (prevailing Central Time)**, before the Honorable Judge Alfredo R. Perez, United States Bankruptcy Judge, in Courtroom 400 of the United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Street, Houston, Texas 77002 (or via telephonic or other electronic means, as the Bankruptcy Court may direct). The Combined Hearing may be continued from time to time by the Bankruptcy Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on such parties as the Bankruptcy Court may order. Moreover, the Plan may be modified or amended, if necessary, pursuant to section 1127 of the Bankruptcy Code, before, during or as a result of the Combined Hearing, without further notice to parties in interest.

CRITICAL INFORMATION REGARDING OBJECTING TO THE PLAN

ARTICLE X OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS. YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

Objection Deadline. The deadline for filing objections to the adequacy of the Disclosure Statement or confirmation of the Plan is **June 27, 2025, at 4:00 p.m. (prevailing Central Time)**.

Any objection to the adequacy of the Disclosure Statement or confirmation of the Plan must: (a) be made in writing, (b) conform to the Bankruptcy Rules, the Bankruptcy Local Rules, and the Complex Case Procedures, (c) set forth the name of the objector and the nature and amount of any claim or interest asserted by the objector against or in the Debtors, (d) state with particularity the legal and factual basis for the objection, and (e) be filed with the Court and served so as to be **actually received** no later than the Objection Deadline by the parties listed below (the “**Notice Parties**”). OBJECTIONS NOT TIMELY FILED AND SERVED IN THE MANNER SET FORTH HEREIN MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT AND MAY BE OVERRULED WITHOUT FURTHER NOTICE.

- a. Counsel to the Debtors: Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, TX 77002 (Attn: Timothy A. (“Tad”) Davidson II, Joseph P. Rovira, Catherine A. Rankin, and Brandon Bell (taddavidson@Hunton.com, josephrovira@Hunton.com, crankin@Hunton.com, bbell@Hunton.com));
- b. Counsel to the DIP Lender and Prepetition Agent: Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, TX 77002 (Attn: Eric M. English, M. Shane Johnson, and James A. Keefe (eenglish@porterhedges.com, sjohnson@porterhedges.com, jkeefe@porterhedges.com));
- c. Office of the United States Trustee for the Southern District of Texas: 515 Rusk Street, Suite 3516, Houston, TX 77002 (Attn: Andrew Jimenez (Andrew.Jimenez@usdoj.gov)).
- d. Counsel to the Creditors’ Committee: McDermott Will & Emery LLP, 2501 North Harwood Street, Suite 1900, Dallas, TX 75201-1664 (Attn: Charles R. Gibbs, Marcus Helt, and Eric Seitz (crgibbs@mwe.com, mhelt@mwe.com, eseitz@mwe.com)).

ADDITIONAL INFORMATION

ARTICLE X OF THE PLAN CONTAINS RELEASE, EXCULPATION AND INJUNCTION PROVISIONS. YOU SHOULD REVIEW THESE PROVISIONS CAREFULLY.