

**OBJECTION DEADLINE: JULY 26, 2021**

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

<b>In re:</b>	§ <b>Chapter 7</b>
	§
<b>COUNTRY FRESH HOLDING</b>	§ <b>Case No.: 21-30574 (MI)</b>
<b>COMPANY INC., et. al.</b>	§
	§ <b>Jointly Administered</b>
<b>Debtors.</b>	§

**NOTICE OF FIRST AND FINAL FEE APPLICATION OF FOLEY & LARDNER LLP  
AS COUNSEL TO THE DEBTORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED DURING  
THE PERIOD FROM FEBRUARY 15, 2021 THROUGH JUNE 21, 2021**

**THE APPLICATION REFERENCED IN THIS NOTICE SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 14 DAYS<sup>1</sup> OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

You are hereby notified that Foley & Lardner LLP (“**Foley**”), counsel for Country Fresh Holding Company Inc. and its above-captioned debtors affiliates, as debtors and debtors-in-possession (collectively, the “**Debtors**”) in the above-referenced chapter 11 cases (the “**Chapter 11 Cases**”), filed its *First and Final Fee Application of Foley & Lardner LLP as Counsel to the Debtors for Allowance and Payment of Compensation for Services Rendered and Reimbursement*

<sup>1</sup> The Conversion Order entered at Docket No. 719 established the objection deadline for any fee applications as July 26, 2021.

*of Expenses Incurred During the Period from February 15, 2021 Through June 21, 2021* (the “**Application**”).

In the Application, Foley requests that the Court approve final compensation of professional fees rendered in the amount of \$2,074,164.00<sup>2</sup> and reimbursement of actual and necessary expenses in the amount of \$48,193.62. Pursuant to the Interim Compensation Order, Foley has been paid \$1,208,227.20 in fees and \$28,773.68 in expenses covering the period from February 15, 2021 through and including April 30, 2021. Foley hereby seeks payment of the outstanding balance of \$815,936.80 in fees and \$19,419.94 incurred but unpaid during the Total Period and the Post-Conversion Flat Fee in the amount of \$50,000.00. A copy of the Application may be obtained from the Clerk of the United States Bankruptcy Court, Southern District of Texas, 515 Rusk, Houston, Texas 77002.

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<sup>2</sup> Total amount represents (a) \$2,024,164.00 incurred from February 15, 2021 through June 21, 2021, and (b) the Post-Conversion Flat Fee of \$50,000. Foley requests Court approval of a flat fee for services rendered after June 21, 2021 to the Debtors in support of the conversion of the Chapter 11 Cases to cases under chapter 7 (defined in the Application as the Post-Conversion Flat Fee).

Dated: July 12, 2021  
Houston, Texas

Respectfully submitted,

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**COUNSEL TO THE DEBTORS**

**CERTIFICATE OF SERVICE**

I do hereby certify that on July 12, 2021, a true and correct copy of the foregoing pleading was served by United States mail, first class, postage prepaid to the parties on the attached Master Service List or via CM/ECF to all parties authorized to receive electronic notice in this case.

/s/ Mark C. Moore

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