

OBJECTION DEADLINE: JULY 26, 2021

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

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

**NOTICE OF FIRST AND FINAL FEE APPLICATION OF
ANKURA CONSULTING GROUP, LLC 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 DAYS¹ 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 Ankura Consulting Group, LLC (“Ankura”), CRO for Country Fresh Holding Company Inc. and its above-captioned debtor affiliates (collectively, the “Debtors”) as Debtors in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), filed its *First and Final Fee Application of Ankura Consulting Group, LLC 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”).

¹ The Conversion Order established the objection deadline for any fee applications as July 26, 2021.

In the Application, Ankura requests that the Court approve final compensation of professional fees rendered in the amount of \$3,520,659.25² and reimbursement of actual and necessary expenses in the amount of \$2,722.33. Pursuant to the Interim Compensation Order, Ankura has been paid \$2,401,085.33 in fees and \$2,722.33 in expenses covering the period from February 15, 2021 through and including May 31, 2021. Ankura hereby seeks payment of the outstanding balance of \$1,122,296.25 in fees incurred but unpaid during the Total Period including estimated Post Conversion fees in the amount of \$90,000.00. 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.

Dated: July 12, 2021
Houston, Texas

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ Mark C. Moore

John P. Melko (TX 13919600)

Email: jmelko@foley.com

Sharon M. Beausoleil (TX 24025245)

Email: sbeausoleil@foley.com

1000 Louisiana Street, Suite 2000

Houston, TX 77002

Telephone: 713.276.5500

and

Mark C. Moore (TX 24074751)

Email: mmoore@foley.com

2021 McKinney Avenue, Suite 1600

Dallas, Texas 75201

Telephone: 214.999.4150

COUNSEL TO THE DEBTORS

² Total amount represents (a) \$3,430,659.25 incurred from February 15, 2021 through June 21, 2021, and (b) \$90,000 in estimated fees incurred or to be incurred after June 21, 2021 for the amendment to the schedules of assets and liabilities, preparation and filing of monthly operating reports, preparation and prosecution of this final fee application and other necessary matters associated with the conversion of these Chapter 11 cases under chapter 7. Ankura requests Court approval of actual fees incurred after June 21, 2021 up to a cap of \$90,000 and will submit its actual invoices prior to the objection deadline for the Application.

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

Mark C. Moore

AKERLY LAW PLLC
(COUNSEL TO BUD'S SALADS INC)
ATTN BRUCE W AKERLY, CARRIE R MCNAIR & ROBERT
N LOUGHRAN
878 S DENTON TAP RD, STE 100
COPPELL, TX 75019

ALDINE INDEPENDENT SCHOOL DISTRICT
ATTN: PAMELA H. WALTERS & VICTORIA VONDER HAAR
2520 W. W. THORNE DRIVE
HOUSTON, TX 77073

ANDREW K ROZELL
(COUNSEL FOR ROBERT REISER & CO, INC.)
323 E JACKSON
HARLINGEN, TX 78550

BOND, SCHOENECK & KING, PLLC
(COUNSEL FOR DEMAREE FRUIT FARM, INC, MASON FARM)
ATTN CAMILLE W HILL, ESQ
ONE LINCOLN CENTER, 18TH FL
SYRACUSE, NY 13202

CLARK HILL STRASBURGER
(COUNSEL FOR WASTE MANAGEMENT, INC)
ATTN: ROBERT P. FRANKE, ANDREW G. EDSON &
AUDREY L. HORNISHER
901 MAIN ST, STE 6000
DALLAS, TX 75202-3794

COKINOS YOUNG
(COUNSEL FOR PACKER SANITATION SERVICES INC LTD)
ATTN CRAIG E POWER & MARIA M BARTLETT
FOUR HOUSTON CENTER
1221 LAMAR ST, 16TH FL
HOUSTON, TX 77010

FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVE NW
WASHINGTON, DC 20580

FOLEY & LARDNER LLP
(COUNSEL TO DEBTORS)
ATTN JOHN P MELKO & SHARON M BEAUSOLEIL
1000 LOUISIANA ST, STE 2000
HOUSTON, TX 77002

FOLEY & LARDNER LLP
(COUNSEL TO DEBTORS)
ATTN MARK C MOORE
2021 MCKINNEY AVE, STE 1600
DALLAS, TX 75201

HARRIS BEACH PLLC
(COUNSEL FOR AGPRO FARMS, AGPRO TRUCKING LLC)
ATTN: WENDY A KINSELLA, ESQ, BRIAN D ROY, ESQ,
& LEE E WOODARD, ESQ.
333 WEST WASHINGTON ST, STE 200
SYRACUSE, NY 13202

HUGHES HUBBARD & REED LLP
(COUNSEL FOR CENVEO WORLDWIDE LIMITED)
ATTN: CHRISTOPHER GARTMAN, ESQ.
ONE BATTERY PARK PLAZA
NEW YORK, NY 10004-1482

INTERNAL REVENUE SERVICES
CENTRALIZED INSOLVENCY OPERATION
PO BOX 7346
PHILADELPHIA, PA 19101-7346

INTERNAL REVENUE SERVICES
DEPARTMENT OF THE TREASURY
1500 PENNSYLVANIA AVE NW
WASHINGTON, DC 20220

INTERNAL REVENUE SERVICES
LOCAL OFFICE
1100 COMMERCE ST, RM 121
DALLAS, TX 75242

KILPATRICK TOWNSEND & STOCKTON LLP
(COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CRED)
ATTN: PAUL M. ROSENBLATT & TODD C. MEYERS
1100 PEACHTREE ST NE, STE 2800
ATLANTA, GA 30309-4528

KILPATRICK TOWNSEND & STOCKTON LLP
(COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CRED)
ATTN: KELLY MOYNIHAN
THE GRACE BUILDING
1114 AVE OF THE AMERICAS
NEW YORK, NY 10036

KLINOWSKI DAMIANO LLP
(COUNSEL TO S&S MARKETING AND SALES, INC. AND C.
LANE COMPANY, LLC)
ATTN: JASON R. KLINOWSKI
PO BOX 43404
BIRMINGHAM, AL 35243

LINEBARGER GOGGAN BLAIR & SAMPSON LLP
(COUNSEL FOR MONTGOMERY COUNTY, HARRIS COUNTY)
ATTN: JOHN P DILLMAN
PO BOX 3064
HOUSTON, TX 77253-3064

LINEBARGER GOGGNAN BLAIR & SAMPSON LLP
(COUNSEL FOR TARRANT COUNTY, DALLAS COUNTY)
ATTN: ELIZABETH WELLER
2777 N STEMMONS FWY, STE 1000
DALLAS, TX 75207

MARTYN AND ASSOCIATES
(COUNSEL FOR C. H. ROBINSON WORLDWIDE, INC.)
ATTN: MARK A. AMENDOLA
820 W. SUPERIOR AVE, TENTH FLOOR
CLEVELAND, OH 44113

MEUERS LAW FIRM, P.L.
(COUNSEL TO BELLA PRODUCE, LLC, HANSHAW SALES,
HOUSTON SOUTH MILL, LLC, SOUTH MILL MUSHROOM, LLC,
GRIMMWAY ENTERPRISES, INC.)
ATTN: STEVEN M. DE FALCO
5395 PARK CENTRAL COURT
NAPLES, FL 34109

MONCRIEF & HART PC
(COUNSEL FOR RIVER FRESH FOODS, LLC AND BLAZER
WILKINSON, LP)
ATTN: DENNIS LEWIS
16 W GABILAN ST
SALINAS, CA 93901

NORTON ROSE FULBRIGHT US LLP
(COUNSEL FOR CORTLAND CAPITAL MARKET SERVICES LLC)
ATTN DAVID ROSENZWEIG, MICHAEL FINGERHUT,
AND STEPHEN CASTRO
1301 AVE OF THE AMERICAS
NEW YORK, NY 10019-6022

NORTON ROSE FULBRIGHT US LLP
(COUNSEL TO CAPITAL MARKET SERVICES LLC)
ATTN: BOB B. BRUNER
1301 MCKINNEY, STE 5100
HOUSTON, TX 77010

OFFICE OF THE UNITED STATES ATTORNEY GENERAL
US DEPARTMENT OF JUSTICE
ATTN: MATTHEW G. WHITAKER
950 PENNSYLVANIA AVE NW
WASHINGTON, DC 20530-0001

OFFICE OF THE UNITED STATES TRUSTEE
FOR THE SOUTHERN DISTRICT OF TEXAS
ATTN: STEPHEN DOUGLAS STATHAM
515 RUSK ST, STE 3516
HOUSTON, TX 77002

OSLER HOSKIN & HARCOURT LLP
ATTN: TRACY SANDLER
100 KING ST W
1 FIRST CANADIAN PL, STE 6200
TORONTO, ON M5X 1B8
CANADA

PAHL & MCCAY
(COUNSEL FOR FLEXIBLE FUNDING LTD., LIABILITY CO.)
ATTN: CATHERINE SCHLOMANN ROBERTSON, ESQ.
225 WEST SANTA CLARA STREET, SUITE 1500
SAN JOSE, CA 95113-1752

PAUL WEISS RIFKIND WHARTON & GARRISON LLP
(COUNSEL TO AD HOC GROUP OF LENDERS)
ATTN: ELIZABETH R. MCCOLM, JOHN W. WEBER,
GRACE HOTZ, KATE AMATO, DIANE MEYERS, THERESA LII,
CATHERINE GOODALL AND JOSEPH FRIEDMAN
1285 AVE OF THE AMERICAS
NEW YORK, NY 10019-6064

PERDUE BRANDON FIELDER COLLINS & MOTT LLP
(COUNSEL TO WOODLANDS METRO CENTER MUD)
ATTN: OWEN M. SONIK
1235 N LOOP W, STE 600
HOUSTON, TX 77008

PERDUE, BRANDON, FIELDER COLLINS & MOTT LLP
(COUNSEL FOR ARLINGTON ISD)
ATTN: EBONEY COBB
500 E BORDER STREET, SUITE 640
ARLINGTON, TX 76010

PORTER HEDGES LLP
(COUNSEL TO AD HOC GROUP LENDERS)
ATTN: JOHN F. HIGGINS, M. SHANE JOHNSON & MEGAN
YOUNG-JOHN
1000 MAIN ST, 36TH FL
HOUSTON, TX 77002

RAMEY & FLOCK, P.C.
(COUNSEL FOR CUSTOM PRODUCE SALES & PACIFIC SALES)
ATTN: STEVE SPITZER
100 E FERGUSON, STE 404
TYLER, TX 75702

RYNN & JANOWSKY, LLP
(COUNSEL FOR CUSTOM PRODUCE SALES & PACIFIC SALES)
ATTN: ELISE O'BRIEN & R. JASON READ
2603 MAIN ST, STE 1250
IRVINE, CA 92614

SCHLANGER SILVER LLP
(COUNSEL FOR CAMBRIAN INNOVATION, INC.)
ATTN: JULIA A. COOK
109 NORTH POST OAK LANE, STE 300
HOUSTON, TX 77024

SECURITIES & EXCHANGE COMMISSION
100 F ST NE
WASHINGTON, DC 20549

SINGER & LEVICK, P.C.
(COUNSEL FOR BREIT INDUSTRIAL HS PROPERTY OWNER)
ATTN: MICHELLE E. SHRIRO, ESQ
16200 ADDISON ROAD, SUITE 140
ADDISON, TX 75001

SPECTOR & COX, PLLC
(COUNSEL TO DIAMOND ONIONS, INC.)
ATTN: HOWARD MARC SPECTOR
12770 COIT RD, STE 1100
DALLAS, TX 75251

SPENCE, DESENBURG & LEE, PLLC
(COUNSEL FOR EFFEX MANAGEMENT SOLUTIONS, LLC)
ATTN: ROSS SPENCE & HENRY W. KNIGHT
1770 SAINT JAMES PLACE, STE 625
HOUSTON, TX 77056

STATE OF TEXAS ATTORNEY GENERAL
ATTN: KEN PAXTON
300 W 15TH ST
AUSTIN, TX 78701

STATE OF TEXAS ATTORNEY GENERAL
ATTN: KEN PAXTON
PO BOX 12548
AUSTIN, TX 78711-2548

STOKES LAW OFFICE LLP
(COUNSEL TO CLASSIC HARVEST LLC, CENTRAL AMERICAN)
ATTN: CRAIG A. STOKES, ESQ. & MARLEEN W. COBB
3330 OAKWELL COURT, STE 225
SAN ANTONIO, TX 78218

TEXAS STATE SECURITIES BOARD
THOMAS JEFFERSON RUSK STATE OFFICE BDLG
208 E 10TH ST
AUSTIN, TX 78701

THE TEXAS COMPTROLLER
ATTN: COURTNEYJ. HULL, ASSISTANT ATTORNEY GENERAL
BANKRUPTCY & COLLECTIONS DIVISION MC 008
P.O. BOX 12548
AUSTIN, TX 78711-2548

THE UNITED STATES ATTORNEYS OFFICE
FOR THE SOUTHERN DISTRICT OF TEXAS
ATTN: RICHARD A KINCHELOE
1000 LOUISIANA ST
HOUSTON, TX 77002

THOMPSON, O'BRIEN, KEMP & NASUTI, P.C.
(COUNSEL FOR O'ROURKE DIST. CO., LLC, D/B/A
O'ROURKE PETROLEUM)
ATTN: ALBERT F. NASUTI, ESQ.
2 SUN COURT, SUITE 400
PEACHTREE CORNERS, GA 30092

THORNTON GROUT FINNIGAN LLP
(COUNSEL FOR COURT APPOINTED MONITOR)
ATTN: REBECCA KENNEDY & PUYA J. FESHARAKI
TD WEST TOWER, TORONTO-DOMINION CENTRE
100 WELLINGTON ST. W., STE 3200
TORONTO, ON M5K 1K7
CANADA

UNITED STATES CUSTOMS AND BORDER PROTECTION
1300 PENNSYLVANIA AVE NW
WASHINGTON, DC 20229

UNITED STATES PATENT AND TRADEMARK OFFICE AND
THE UNITED STATES COPYRIGHT OFFICE
101 INDEPENDENCE AVE SE
WASHINGTON, DC 20559-6000

US ENVIRONMENTAL PROTECTION AGENCY
ATTN: SCOTT PRUITT, ADMINISTRATOR
ARIEL RIOS BLDG, 1200 PENNSYLVANIA AVE NW
WASHINGTON, DC 20460

VILLEDA LAW GROUP
(COUNSEL FOR AMH PRODUCE COMPANY)
ATTN: ANTONIO VILLEDA, MARK TALBOT
6316 NORTH 10TH STREET, BLDG. B
MCALLEN, TX 78504

VORYS, SATER, SEYMOUR AND PEASE LLP
(COUNSEL FOR INTERITY EXPRESS LOGISTICS LLC)
ATTN: STEVEN R. RECH
909 FANNIN ST, STE 2700
HOUSTON, TX 77010

WALKER WILCOX MATOUSEK LLP
(COUNSEL FOR AMAZON PRODUCE NETWORK LLC)
ATTN: TONY L DRAPER
1001 MCKINNEY, STE 2000
HOUSTON, TX 77002

WINSTON & STRAWN LLP
(COUNSEL FOR STELLEX/CF BUYER (US), LLC)
ATTN: CAREY D. SCHREIBER
200 PARK AVENUE
NEW YORK, NY 10166

WINSTON & STRAWN LLP
(COUNSEL TO STELLEX/CF BUYER (US), LLC)
ATTN: LAURA KRUCKS
35 W. WACKER DRIVE
CHICAGO, IL 60601

L. Katie Mason
Quarles & Brady LLP
411 East Wisconsin Ave., Suite 2400
Milwaukee, WI 53202