

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

**IN RE:**

**COUNTRY FRESH HOLDING  
COMPANY, INC., *et. al.*<sup>1</sup>**

**Debtors.**

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**Case No.: 21-30574**

**CHAPTER 7 TRUSTEE'S MOTION  
TO FILE DOCUMENT UNDER SEAL**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, 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 21 DAYS 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.**

**TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:**

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<sup>1</sup> The Debtors in these Chapter 7 cases and the last four digits of each Debtors' taxpayer identification number are as follows: Country Fresh Holding Company Inc. (7822); Country Fresh Midco Corp. (0702); Country Fresh Acquisition Corp. (5936); Country Fresh Holdings, LLC (7551); Country Fresh LLC (1258); Country Fresh Dallas, LLC (7237); Country Fresh Carolina, LLC (8026); Country Fresh Midwest, LLC (0065); Country Fresh Orlando, LLC (7876); Country Fresh Transportation LLC (8244) CF Products, LLC (8404) Country Fresh Manufacturing, LLC (7839); Champlain Valley Specialty of New York, Inc. (9030); Country Fresh Pennsylvania, LLC (7969); Sun Rich Fresh Foods (NV) Inc. (5526); Sun Rich Fresh Foods (USA) Inc. (0429); and Sun Rich Fresh Foods (PA) Inc. (4661). The Debtors' principal place of business is 3200 Research Forest Drive, Suite A5, The Woodlands, TX, 77381.

Janet S. Northrup (“**Trustee**”), in her capacity as the Chapter 7 Trustee of Country Fresh Holding Company, Inc. *et al* (“**Debtors**”) files this *Motion to File Document Under Seal* (the “**Motion**”) and represents as follows:

1. On June 30, 2021, the Trustee alerted the Court to an issue with wire fraud in this case. The Court requested the Trustee to file a report concerning this issue under seal.

2. Pursuant to the Court’s request and Fed. R. Bankr. P. 9037(c), the Trustee hereby requests authority to file the requested report under seal due to the sensitive and confidential nature of the information contained in the report. This report is filed contemporaneously with this Motion.

3. Pursuant to Bankruptcy Local Rule 9037-1(g), the Trustee states that the document sought has not been filed in redacted form.

Wherefore, premises considered, the Trustee requests the Court enter the attached order authorizing the Trustee to file he requested report under seal and for such further and other relief as the Court deems just.

Dated July 28, 2021

Respectfully Submitted,

/s/ Heather Heath McIntyre

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PROPOSED ATTORNEYS FOR TRUSTEE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 28, 2021 a true and correct copy of the foregoing document has been served on (i) parties receiving ECF notice via ECF in the above-referenced case, and (ii) parties listed on the attached Master Service List via first-class, U.S. mail, postage prepaid to the extent not served via ECF.

/s/ Heather Heath McIntyre  
Heather Heath McIntyre