

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

IN RE:

**COUNTRY FRESH HOLDING
COMPANY, INC., *et. al.*¹**

Debtors.

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Case No.: 21-bk-30574

Chapter 7

Jointly Administered

**NOTICE OF INTENT TO ABANDON ALL PROPERTY OF THE
DEBTORS' BANKRUPTCY ESTATES CURRENTLY HELD OR
STORED BY IRON MOUNTAIN AND PUBLIC STORAGE**

THIS NOTICE SEEKS ACTION THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE NOTICE, 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 FOURTEEN (14) DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE RELIEF SOUGHT, 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 NOTICE 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 NOTICE AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

PLEASE TAKE NOTICE that, pursuant to 11 U.S.C. § 554(a), Janet S. Northrup, Chapter 7 Trustee (the “**Trustee**”) for the bankruptcy estates of Country Fresh Holding Company, Inc., et al., (“**Debtors**”) intends to abandon all documents, books, records, including

¹ 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.

any invoices, financial reports, tax documents, employee records, transportation files, and any other assets (collectively, the “**Abandoned Assets**”) held or stored by both Iron Mountain and Public Storage wherever they may be located or found as of **September 29, 2021, at 5:00 p.m. CT.**

The Trustee believes that the abandonment is warranted because the costs of administering the Abandoned Assets outweigh any recoverable value for any unsecured creditors. Administering the Abandoned Assets will not result in a meaningful distribution to creditors. Abandonment of the Abandoned Assets is appropriate pursuant to 11 U.S.C. § 554(a), because the Abandoned Assets are burdensome to the Debtors’ bankruptcy estates and are of inconsequential value and of no benefit to the estates.

Prior to the filing of this Notice, Stellex/CF Buyer (US) LLC has declined to take possession of any of the Abandoned Assets.

If there is no objection, the abandonment of the Abandoned Assets will be deemed to take place on September 29, 2021, at 5:00 p.m. CT.

DATED: September 15, 2021.

Respectfully submitted,

/s/ Heather Heath McIntyre

Wayne Kitchens TBN 11541110

wkitchens@hwa.com

Heather McIntyre TBN 24041076

hmcintyre@hwa.com

HUGHESWATTERSASKANASE, LLP

Total Plaza

1201 Louisiana, 28th Floor

Houston, Texas 77002

Telephone: (713) 759-0818

Facsimile: (713) 759-6834

**ATTORNEYS FOR JANET S. NORTHRUP,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, a true and correct copy of the foregoing document was served on (i) the parties receiving ECF notice via the Court's CM/ECF system in the above-referenced case, (ii) the parties listed on the attached Master Service List via first-class U.S. Mail, postage-prepaid to the extent not served via ECF, and (iii) the parties listed below by the methods listed below.

Jacqueline M. Price – Counsel for Iron Mountain
Hackett Feinberg P.C.
155 Federal Street, 9th Floor
Boston, MA 02110
Via US First Class Mail Postage Prepaid

Katie Ganderson
Regional Vice President for Public Storage
kganderson@publicstorage.com
Via Electronic Mail

/s/ Heather Heath McIntyre
Heather Heath McIntyre