

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

United States Courts
Southern District of Texas
FILED

NOV 03 2021

In re:

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

Debtors.

CHAPTER 11

Case No. 21-30574

NOTICE OF MOTION

Nathan Ochsner, Clerk of Court

PLEASE TAKE NOTICE that upon the affirmation of Seth D. Carson, Esquire, and the exhibits attached hereto, and upon all the papers and pleadings previously served and all proceedings herein, Enoy Joseph hereby moves this Court to issue an ORDER that would allow the bankruptcy stay to be lifted in the case of ENOY JOSEPH v. JOSEPH RUBIN, et al. No. 2021-01493, in the Pennsylvania Court of Common Pleas, Montgomery County.

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
Seth D. Carson, Esq.
1835 Market Street, Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Email: seth@dereksmithlaw.com
Counsel for Plaintiff

DATED: October 27, 2021

TO: Leonard S. Sabato, Esq.
Law Offices of Hubshman, Flood, Dorn, Kolb & Schweikert
House Counsel for the Progressive Group
Of Insurance Companies
5165 Campus Drive, Suite 200
Plymouth Meeting, PA 19462
Phone: 610-276-4974
Fax: 866-842-1482
Leonard_S_Sabato@Progressive.com
Counsel for Defendant Joseph Rubin

Emily K. Harlovic, Esq.
Burns White
Burns White Center
48 26th Street
Pittsburgh, PA 15222
Phone: 412-995-3074 (O)
Fax: 412-995-3300 (F)
ekharlovic@burnswhite.com
*Counsel for Defendants Maximo Vargas, Janos Delivery, Inc., and FedEx Ground
Package System*

Brian P. Corcoran, Esq.
Reilly, McDevitt & Henrich, P.C.
One South Penn Square, Suite 410
Philadelphia, PA 19107
Phone: 215-972-5200
Cell: 856-701-7893
Fax: 215-972-0405
Counsel for Defendant Country Fresh Pennsylvania, LLC

Sharon Marie Beausoleil, Esq.
John P Melko, Esq.
Mark C. Moore, Esq.
Foley & Lardner LLP
1000 Louisiana Street, Suite 2000
Houston, Tx 77002
Phone: 713-276-5086
sbeausoleil@foley.com
jmelko@foley.com
mmoore@foley.com
Counsel for Debtors Country Fresh Holding Company Inc.