

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

IN RE:	§	
	§	
COUNTRY FRESH HOLDING COMPANY, INC., et. al.¹	§	Case No.: 21-30574
	§	
Debtors.	§	Jointly Administered
	§	

**TRUSTEE’S LIMITED OBJECTION TO THE MOTION FOR RELIEF FROM
THE AUTOMATIC STAY FILED ON BEHALF OF JOSEPH ENOY**

[Related to Docket No. 1046]

Janet S. Northrup, the Chapter 7 Trustee (the “**Trustee**”) of the bankruptcy estate of Country Fresh Holding Company, Inc. et. al. (“**Debtors**”), the debtors in the above-styled Chapter 7 case, files this *Trustee’s Limited Objection to the Motion for Relief from the Automatic Stay Filed on Behalf of Joseph Enoy* (the “**Limited Objection**”) and respectfully states as follows:

BACKGROUND AND LIMITED OBJECTION

1. On November 3, 2021, Joseph Enoy (the “**Movant**”), by and through his counsel, filed a motion requesting relief from the Automatic Stay filed at Docket No. 1046 (the “**Motion**”).
2. While the Trustee is not generally opposed to the relief requested in the Motion, the Trustee hereby makes a limited objection to the entry of the proposed order submitted with the Motion, as it does not provide sufficiently clear relief allowing the Movant to solely seek recovery against potentially applicable insurance policies or their proceeds.

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).

3. The Trustee proposes an order specifying and clarifying that any recovery, enforcement of any judgment, or other relief to be provided to the Movant is solely as to any potentially applicable insurance policies or their proceeds.

4. Since the filing of the Motion, the Trustee has been working with counsel for the Movant on a stipulation and agreed order in full resolution of the Motion.

RESERVATION OF RIGHTS

5. The Trustee reserves the right to supplement this Limited Objection or to raise further objections to the Motion.

WHEREFORE, the Trustee requests that her limited objection be sustained and that she be granted such other and further relief that she may be justly entitled.

Dated: November 15, 2021.

Respectfully submitted,

/s/ Heather Heath McIntyre

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 15, 2021, a true and correct copy of the foregoing document was served on (i) parties receiving ECF notice via the Court's CM/ECF system in the above-referenced case, and (ii) parties or individuals listed below by electronic mail.

Counsel for Joseph Enoy

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/s/ Heather Heath McIntyre

Heather Heath McIntyre