

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

EARTH FARE, INC., *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 20-10256 (KBO)  
)  
) (Jointly Administered)  
)  
) **Ref. Docket No. 699**

**CERTIFICATION OF NO OBJECTION REGARDING DOCKET NO. 699**

On February 26, 2020, the Court entered its *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 222] (the “Interim Compensation Order”) in the bankruptcy cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”).

On December 6, 2021, A & G Realty Partners, LLC, as real estate consultant and advisor for the Debtors, filed its *First and Final Fee Application of A & G Realty Partners, LLC for Allowance of Administrative Claim for Compensation and Reimbursement of Expenses for the Period from February 4, 2020 Through March 31, 2020* requesting final allowance of fees in the amount of \$239,700.00 and expenses in the amount of \$500.00 (the “Application”) [Docket No. 699].

The undersigned certifies that a review of the Court’s docket in these cases reflects that no answer, objection, or other responsive pleading to the Application appears thereon. Pursuant to the Notice of Application, objections to the Application were to be filed and served no later than 4:00 p.m. (ET) on December 27, 2021.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Earth Fare, Inc. (3936) and EF Investment Holdings, Inc. (8084). The mailing address for each of the Debtors is P.O. Box 1389, Fletcher, North Carolina 28732.

The Debtors respectfully request that the Court enter the proposed order attached hereto as

**Exhibit A** at its earliest convenience without further notice or hearing.

Dated: December 28, 2021  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

*/s/ Shane M. Reil*

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**EXHIBIT A**

**Proposed Order**

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**ORDER APPROVING FIRST AND FINAL FEE APPLICATION OF  
A&G REALTY PARTNERS, LLC FOR ALLOWANCE OF ADMINISTRATIVE  
CLAIM FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FEBRUARY 4, 2020 THROUGH MARCH 31, 2020**

Upon consideration of the *First and Final Fee Application of A&G Realty Partner, LLC for Allowance of Administrative Claim for Compensation and Reimbursement of Expenses for the Period from February 4, 2020 through March 31, 2020* (the “Application”), together with any responses thereto; and adequate notice of the Application having been given; and after due deliberation; and sufficient cause appearing therefor; it is hereby

ORDERED that the Application is approved; and it is further

ORDERED, that A&G Realty Partners, LLC is allowed final allowance of fees in the amount of \$239,700.00 and expenses in the amount of \$500.00; and it is further

ORDERED, that the Debtors are authorized to pay the amounts allowed to A&G Realty Partners, LLC; and it is further

ORDERED that this Order shall be effective upon entry; and it is further

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Earth Fare, Inc. (3936) and EF Investment Holdings, Inc. (8084). The mailing address for each of the Debtors is P.O. Box 1389, Fletcher, North Carolina 28732

ORDERED that the Court shall retain jurisdiction to hear all matters arising from or related to the implementation of this Order.