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Proposed Counsel for the Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

	§	Chapter 11
In re:	§	
	§	Case No. 25-90010
GROFF TRACTOR MID ATLANTIC, LLC, et al.	§	
	§	(Jointly Administered)
	§	
Debtors.¹	§	
	§	

NOTICE OF FINAL HEARING ON CASH COLLATERAL MOTION

PLEASE TAKE NOTICE that on October 14, 2025, Groff Tractor Mid Atlantic, LLC (“GTMA”), Dealer 2023, LLC (“Dealer”), and Groff Tractor Holdings, LLC (“Holdings,” and collectively with GTMA and Dealer, the “Debtors”) filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code in this Court.

PLEASE TAKE FURTHER NOTICE that on October 27, 2025, the Debtors filed the *Debtors’ Emergency Motion for Entry of Interim and Final Orders (i) Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363, (ii) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363, (iii) Granting Protections Under 11 U.S.C. § 364 for Continuation of the Purchase Card Program, (iv) Modifying the Automatic Stay, (v) Scheduling a Final Hearing, and (vi) Granting Related Relief* [Docket No. 74] (the “Cash Collateral Motion”).

PLEASE TAKE FURTHER NOTICE that on October 28, 2025, the Court held an emergency hearing on the Cash Collateral Motion.

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, are: Groff Tractor Mid Atlantic, LLC (7629), Dealer 2023 LLC (3275), and Groff Tractor Holdings, LLC (0486), and the location of the service address for the Debtors is: 1460 Main Street, Suite 200, Southlake, TX 76092.

PLEASE TAKE FURTHER NOTICE that, following the emergency hearing, the Court entered the *Interim Order (i) Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363, (ii) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363, (iii) Granting Protections Under 11 U.S.C. § 364 for Continuation of the Purchase Card Program, (iv) Modifying the Automatic Stay, (v) Scheduling a Final Hearing, and (vi) Granting Related Relief*[Docket No. 84] (the “Interim Order”).

PLEASE TAKE FURTHER NOTICE that a final hearing on the Cash Collateral Motion shall occur on **November 13, 2025, at 1:30 p.m. (CT)** before the Honorable Edward L. Morris, United States Bankruptcy Judge for the Northern District of Texas, Fort Worth Division, which hearing shall take place in person and via WebEx using the information below:

For WebEx Video Participation/Attendance:

Link: <https://us-courts.webex.com/meet/morris>

Meeting Number: 2309-445-3213

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1.650.479.3207

Meeting ID: 2309-445-3213

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Cash Collateral Motion shall be filed on or before **November 7, 2025, at 5:00 p.m. (CT)**.

PLEASE TAKE FURTHER NOTICE that information pertaining to these cases and copies of the Cash Collateral Motion and Interim Order are available at: <https://dm.epiq11.com/gtm>.

PLEASE TAKE FURTHER NOTICE that additional information for remote attendance at the hearing may be obtained through the following link: www.txnb.uscourts.gov/sites/txnb/files/hearings/Morris%20WebEx%20Hearing%20Instructions%20%28rev%20Apr%202023%29.pdf

Dated: October 29, 2025

Respectfully submitted,

/s/ Eric T. Haitz

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PROPOSED COUNSEL FOR THE DEBTORS

CERTIFICATE OF SERVICE

I certify that on October 29, 2025, a true and correct copy of the foregoing document was served via the Court's CM/ECF system and/or by United States first class mail on the Complex Service List attached hereto.

/s/ Eric T. Haitz

Eric T. Haitz

**Groff Tractor Mid Atlantic, LLC,
et al., Debtors
Case No. 25-90010-ELM-11
COMPLEX SERVICE LIST AS OF
10-29-2025**

Debtors & Counsel:

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Essex, MD 21221

Dealer 2023 LLC**
Groff Tractor Holdings, LLC
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Southlake, TX 76092

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**Consolidated 30 Largest
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E-Emphasys Technologies Inc
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Roadtec Inc
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Liebherr USA Co
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EPG Insurance Inc
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Toku America Inc
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Bankruptcy & Collection Division MC 008
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CNH Industrial America LLC**
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** These parties or their counsel are ECF filers. Accordingly, pursuant to FRCP 2(B)(3) made applicable by the Federal Rule of Bankruptcy Procedure and the Bankruptcy Local Rules for the Northern District of Texas, and pursuant to the ECF Administrative Procedures—*Electronic Filing and Service of Documents*: ECF System “Notice of Electronic Filing” or, if so elected by the recipient, a “Daily Summary Report of Bankruptcy Filings” is the equivalent of service of the document upon such parties by the Electronic Filer.