

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

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

**DECLARATION OF MICHAEL JUNIPER IN SUPPORT OF THE DEBTORS’
RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY REGARDING
EQUIPMENT, OR ALTERNATIVELY, MOTION FOR ADEQUATE PROTECTION**

I, Michael Juniper, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a Managing Director and Partner at CR3 Partners LLC (“CR3”), a financial consulting firm, and I have been appointed as the Chief Restructuring Officer of Groff Tractor Mid Atlantic, LLC (“GTMA”), and each of the other above-captioned debtors and debtors in possession (collectively, the “Debtors” or “Company”).

2. I have more than 20 years of financial and operation experience spanning a wide range of industries, including dealership, manufacturing, distribution, hospitality and entertainment, publishing, energy, oil and gas, and real estate.

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.

3. I specialize in assisting distressed companies and, in connection therewith, have served in various roles, including chief restructuring officer, chief financial officer, treasurer, and financial advisor. Before I joined CR3 Partners in 2017, I served as the Senior Vice President of the Corporate Restructuring Group at Deloitte and as a Managing Director of CRG Partners Group LLC prior to its acquisition by Deloitte.

4. I am familiar with the Debtors' businesses, financial affairs, and day-to-day operations. As a result of my service with the Company, review of relevant documents, and discussions with other members of the Company's management team and its professionals, I am familiar with the Company and in particular the Debtors' day-to-day operations, business affairs, and books and records.

5. I have read the *Motion for Relief from Automatic Stay Regarding Equipment, or Alternatively, Motion for Adequate Protection* [Docket No. 335] (the "Motion") filed by Volvo Financial Services, a division of VFS US LLC ("VFS") and VFS Leasing Co. ("Volvo Leasing") and, together with VFS, the "Movants"). The Motion references (i) nineteen (19) items of equipment defined as the VFS Inventory; and (ii) three (3) items of equipment leased from Volvo Leasing, defined collectively with the VFS Inventory as the "Equipment". For purposes of the Declaration, I will refer to the same definitions of VFS Inventory and Equipment as used in the Motion.

6. I am authorized to submit this Declaration in support of the *Debtors' Response to Motion for Relief from Automatic Stay Regarding Equipment, or Alternatively, Motion for Adequate Protection* and, if called upon to testify, I could and would testify competently to the facts set forth herein.

7. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon my personal knowledge of the Debtors' operations, finances and assets, information learned from my review of relevant documents, information supplied to me by other members of the Debtors' management and the Debtors' professional advisors, or my opinion based on my experience, knowledge, and information concerning the Debtors' operations, assets and financial condition. To the extent that any information provided herein is materially inaccurate, I will act promptly to notify the Court and other parties; however, I believe all information herein to be true and correct to the best of my knowledge.

a. Equity in the Equipment

8. Debtors engaged a third party specializing in construction and machinery equipment appraisals to prepare a fair market value appraisal of the Debtors' assets as of October 1, 2025 (the "Appraisal"), which included the VFS Inventory. I have reviewed the Appraisal and the methodology and data relied upon. I also have knowledge of the Equipment and its condition. Attached as **Exhibit A** is an excerpt of the Appraisal with the Fair Market Value ("FMV") pertaining specifically to the VFS Inventory, and showing that the FMV of the VFS Inventory was approximately \$6,183,222, as of October 1, 2025. Further, the VFS Inventory is in substantially the same condition today as it was on October 1, 2025, and it is my opinion based on my knowledge and experience with respect to the VFS Inventory that the current FMV of the VFS Inventory is not less than \$6,183,222. Thus, Debtors submit that Movants are oversecured with respect to the debt alleged in the Motion of \$6,065,020.11. *See* Motion at p. 4. Additionally, since the Petition Date, rental receipts on Movants' Equipment are approximately \$246,000, and Debtors continue to maintain at least that amount in cash, thus Debtors submit that Movants' interest in cash collateral is adequately protected.

b. Leases, Storage, and Maintenance of the Equipment

9. **Exhibit A** also includes the leasing status of each item of Equipment referenced in the Motion that the Debtors have leased to a third-party, as applicable.

10. Debtors perform required maintenance on the Equipment in their possession, which is secured in the Debtors' yard. Lessees of the Equipment are also obligated to perform required maintenance on the Equipment. Therefore, I dispute the assertion that the Equipment is subject to "rapid" depreciation under the facts and circumstances.

11. All of the Equipment is insured. A true and correct copy of the current proof of insurance is attached hereto as **Exhibit B**.

CONCLUSION

12. For the reasons set forth above, I believe that Movants' interest in the Equipment is adequately protected and that the Court should deny the Motion.

13. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: January 12, 2026

/s/ Michael Juniper

Michael Juniper

Managing Director and Partner

CR3 Partners LLC and CFO for the Debtors



Groff Tractor Mid Atlantic, LLC
 Volvo Asset Listing
 DRAFT--Confidential Settlement Communication, Pursuant to FRE 408

| GTMA Tracking Number | Serial Number | Assigned Branch | Model | Manufacturer | Volvo Description | GTMA Description | Model Year | Lender Name | Rouse FMV | Renter or lessee name, if applicable; otherwise GTMA | Renter or lessee address, if applicable; otherwise GTMA location |
|----------------------|-------------------|---------------------|-------|--------------|-------------------------|--------------------------|------------|--|-------------|--|--|
| EQ0065185 | ROKA1281A00201170 | VINELAND, NJ | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2023 | VOLVO FINANCIAL SERVICES VFS US | \$ 271,068 | VICTORY GARDENS, INC. | 424 Easton Rd, Warrington, PA 18976 |
| EQ0075362 | ROKA1281A00201279 | VINELAND, NJ | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | VICTORY GARDENS, INC. | 424 Easton Rd, Warrington, PA 18976 |
| EQ0070105 | ROKA1281C00201143 | BALTIMORE ESSEX, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2023 | VOLVO FINANCIAL SERVICES VFS US | \$ 271,068 | BRY'S LAWN CARE AND LANDSCAPING LLC | 11720 Eastern Ave, Middle River, MD 21220 |
| EQ0074335 | ROKA1281C00201280 | FREDERICK, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0060249 | ROKA1281C00201286 | FREDERICK, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2022 | VOLVO FINANCIAL SERVICES VFS US | \$ 218,347 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0060248 | ROKA1281K00201275 | VINELAND, NJ | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | GROFF TRACTOR MID ATLANTIC, LLC | 551 N. Harding Highway, Vineland, NJ 08360 |
| EQ0072964 | ROKA1281P00201193 | BALTIMORE ESSEX, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2023 | VOLVO FINANCIAL SERVICES VFS US | \$ 271,068 | GREAT MILLS TRADING POST | 20171 Point Lookout Rd, Great Mills, MD 20634 |
| EQ0060250 | ROKA1281P00201260 | BALTIMORE ESSEX, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | PLEASANTS CONSTRUCTION INC | 24024 Frederick Rd, Clarksburg, MD 20871 |
| EQ0072963 | ROKA1281T00201192 | FREDERICK, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2023 | VOLVO FINANCIAL SERVICES VFS US | \$ 271,068 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0075224 | ROKA1281V00201281 | FREDERICK, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | TRITON CONSTRUCTION, INC | 3890 Chestnut Ridge Rd Grantsville, MD 21536 |
| EQ0074338 | ROKA1281V00201331 | FREDERICK, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0064519 | ROKA1290K00141066 | UPPER MARLBORO, MD | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2023 | VOLVO FINANCIAL SERVICES VFS US | \$ 318,790 | BAY AREA EXCAVATION | 917 Long Point Rd, Grasonville, MD 21638 |
| EQ0064522 | ROKA1290V00141105 | FREDERICK, MD | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 387,801 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0074339 | ROKA1343C00231022 | VINELAND, NJ | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | VICTORY GARDENS, INC. | 424 Easton Rd, Warrington, PA 18976 |
| EQ0074337 | ROKA1343L00231025 | UPPER MARLBORO, MD | RA30 | ROKBAK | RA30 Articulated Hauler | 30 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 327,851 | PLEASANTS CONSTRUCTION INC | 24024 Frederick Rd, Clarksburg, MD 20871 |
| EQ0064521 | ROKA1346C00171021 | VINELAND, NJ | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 387,801 | GROFF TRACTOR MID ATLANTIC, LLC | 551 N. Harding Highway, Vineland, NJ 08360 |
| EQ0074334 | ROKA1346C00171026 | FREDERICK, MD | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 387,801 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0077098 | ROKA1346K00171024 | VINELAND, NJ | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 387,801 | Rizzo & Sons Excavating, LLC | 515 N Main St, Barnegat, NJ 08005 |
| EQ0074333 | ROKA1346T00171022 | FREDERICK, MD | RA40 | ROKBAK | RA40 Articulated Hauler | 40 Ton Articulated Truck | 2024 | VOLVO FINANCIAL SERVICES VFS US | \$ 387,801 | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0075331 | ROKA1290H00141075 | FREDERICK, MD | RA40 | ROKBAK | RA40 | 40 Ton Articulated Truck | 2023 | <i>Leased equipment; not included in FMV appraisal</i> | \$ - | GROFF TRACTOR MID ATLANTIC, LLC | 1561 Tilco Drive, Frederick, MD 21704 |
| EQ0075329 | ROKA1281K00201177 | GREENWOOD, DE | RA30 | ROKBAK | RA30 | 30 Ton Articulated Truck | 2023 | <i>Leased equipment; not included in FMV appraisal</i> | \$ - | GROFF TRACTOR MID ATLANTIC, LLC | 12420 Sussex Highway, Greenwood, DE 19950 |
| EQ0075330 | ROKA1281J00201178 | GREENWOOD, DE | RA30 | ROKBAK | RA30 | 30 Ton Articulated Truck | 2023 | <i>Leased equipment; not included in FMV appraisal</i> | \$ - | GROFF TRACTOR MID ATLANTIC, LLC | 12420 Sussex Highway, Greenwood, DE 19950 |
| | | | | | | | | | \$6,183,222 | | |



From: Marie Schock
To: Mike Juniper
Subject: RE: email on coverage
Date: Monday, January 12, 2026 2:20:21 PM
Attachments: image001.png
image002.png
image003.png
image004.png

External (mschock@seltzergroup.com)

[Graymail](#) [Spam](#) [Phish](#) [More...](#)

Mike,

Please be advised that we have bound coverage for the General Liability, Property and Equipment, Auto and Umbrella coverages. We are waiting for some additional information to provide binders and certificates. As soon as it is received we will forward binders and certificates.

With best regards,

Marie Schock, CISR
Commercial Lines Account Manager



OFFICE: 888.366.1000 ext. 268
DIRECT: 570.593.5514
FAX: 888.512.3484
seltzergrouppartners.com



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From: Mike Juniper <mike.juniper@cr3partners.com>
Sent: Monday, January 12, 2026 2:26 PM
To: Marie Schock <mschock@seltzergroup.com>
Subject: email on coverage

Marie

Do you have any certificates of insurance or other "proof"?

If not, can I at least get a clean email from you stating that Property & Casualty and General Liability policies have been bound and that we are awaiting certificates?

Need for a bankruptcy filing document I need to get out today.

Mike Juniper | Managing Director | Partner

Dallas, TX

Office: (800) 728-7176 ext. 209

Direct: (314) 374-4543

[Bio](#) | [Website](#) | [LinkedIn](#)

CR3 PARTNERS
PARTNERS FOR THE ROAD AHEAD

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