

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

IN RE:	§	CHAPTER 11
	§	
GROFF TRACTOR MID ATLANTIC, LLC, <i>ET AL.</i> , ¹	§	CASE NO.: 25-90010-ELM11
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

NOTICE OF WITHDRAWAL OF DOCUMENTS 537 and 537-1

TO THE HONORABLE EDWARD L. MORRIS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Rubble Master Americas Corp., and files this Notice to Withdraw Document 537, its Motion for Entry of an Order Modifying the Automatic Stay to Permit Completion of the Pending Prepetition Litigation Between Debtor Groff Tractor Mid Atlantic, LLC and Rubble Master Americas Corp., including Document 537-1, Motion to Lift Stay Exhibit 1 Letter of Intent, filed on February 17, 2026.

PRAYER

WHEREFORE, Rubble Master Americas Corp. requests that Document 537, Motion for Entry of an Order Modifying the Automatic Stay to Permit Completion of the Pending Prepetition Litigation Between Debtor Groff Tractor Mid Atlantic, LLC and Rubble Master Americas Corp., which includes Document 537-1, Motion to Lift Stay Exhibit 1 Letter of Intent, be withdrawn from the record and that Rubble Master Americas Corp. has such further relief as is just.

February 27, 2026.

¹ The “Debtors” in these Bankruptcy Cases, along with the last four digits of the Debtors’ federal tax identification numbers, are: Groff Tractor Mid Atlantic, LLC (“GTMA”) (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.

Respectfully Submitted,

KEARNEY, MCWILLIAMS & DAVIS, PLLC

/s/Stacey L. Barnes

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Attorneys for Movant,

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CERTIFICATE OF SERVICE

I hereby certify that, on February 27, 2026, a true and correct copy of the foregoing document was served upon all counsel and parties authorized to receive electronic notices via the Court's electronic ECF system.

/s/Stacey L. Barnes

Stacey L. Barnes