

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

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<b>In re</b>	:	<b>Chapter 11</b>
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<b>CTI FOODS, LLC, et al.,</b>	:	<b>Case No. 19-10497 (CSS)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON APRIL 18, 2019 AT 1:00 P.M. (ET)**

**MATTER GOING FORWARD**

1. Joint Prepackaged Chapter 11 Plan of CTI Foods, LLC and its Affiliated Debtors [D.I. 17; 3/11/19]

Related Documents:

- A. Disclosure Statement for Joint Prepackaged Chapter 11 Plan of Reorganization of CTI Foods, LLC and its Affiliated Debtors [D.I. 16; 3/11/19]
- B. Affidavit of Service of Solicitation Materials [D.I. 51; 3/11/19]
- C. Order (I) Scheduling Combined Hearing to Consider (A) Approval of Disclosure Statement, (B) Approval of Solicitation Procedures and Forms of Ballots, and (C) Confirmation of Prepackaged Plan; (II) Establishing an Objection Deadline to Object to Disclosure Statement and Plan; (III) Approving the Form and Manner of Notice of Combined Hearing, Objection Deadline, and Notice of Commencement; (IV) Conditionally Waiving Requirement of Filing Statement of Financial Affairs and Schedules of Assets and Liabilities; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Establishing the Official Record Date for Holders Under the Second Lien Term Loan Agreement; (VII) Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors; and (VIII) Granting Related Relief Pursuant to Sections 105(a), 341, 521(a), 1125, 1126, and 1128 of the Bankruptcy Code and Bankruptcy Rules 1007, 2002, 3017, and 3018 [D.I. 72; 3/12/19]

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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, as applicable, are: Chef Holdings, Inc. (8070); Chef Intermediate, Inc. (8653); CTIF Holdings, Inc. (0046); Chef Investment, LLC (3918); CTI Foods Acquisition LLC (3918); CTI Foods Holding Co., LLC (8320); CTI Services Corporation (2331); CTI Foods, LLC (3673); CTI Arlington, LLC (6103); CTI Saginaw I, LLC (6133); CTI King of Prussia, LLC (4771); CTI-SSI Food Services, LLC (8322); S & S Foods LLC (7447); Custom Food Products Holdings, LLC (2697); Custom Food Products, LLC (0697); Liguria Holdings, Inc. (8652); and Liguria Foods, Inc. (6446). The Debtors’ mailing address is 504 Sansom Blvd., Saginaw, Texas 76179.

- D. Notice of (I) Commencement of Chapter 11 Bankruptcy Cases, (II) Combined Hearing on Disclosure Statement, Confirmation of Joint Prepackaged Chapter 11 Plan, and Related Matters, and (III) Objection Deadlines, and Summary of Debtors' Joint Prepackaged Chapter 11 Plan, and Notice of Assumption of Executory Contracts and Unexpired Leases of Debtors and Related Procedures [D.I. 76; 3/13/19]
- E. Affidavit of Service of Nuno Cardoso regarding the Notice of (I) Commencement of Chapter 11 Bankruptcy Cases, (II) Combined Hearing on Disclosure Statement, Confirmation of Joint Prepackaged Chapter 11 Plan, and Related Matters, and (III) Objection Deadlines, and Summary of Debtors' Joint Prepackaged Chapter 11 Plan, and Notice of Assumption of Executory Contracts and Unexpired Leases of Debtors and Related Procedures [D.I. 99; 3/22/19]
- F. Notice of Rescheduled (I) Omnibus Hearing Date and (II) Hearing to Consider Confirmation of Joint Prepackaged Chapter 11 Plan of CTI Foods, LLC and its Affiliated Debtors [D.I. 100; 3/25/19]
- G. Notice of Filing of Supplement to Joint Prepackaged Chapter 11 Plan of CTI Foods, LLC and Its Affiliated Debtors [D.I. 101; 3/25/19]
- H. Declaration of James Daloia of Prime Clerk LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Joint Prepackaged Chapter 11 Plan of Reorganization of CTI Foods, LLC and its Affiliated Debtors [D.I. 155; 4/8/19]

Response Deadline: April 11, 2019 at 5:00 p.m. (ET); extended to (i) April 15, 2019 at 5:00 p.m. (ET) for the United States and the Second Lien Term Loan Agent and (ii) April 16, 2019 at 11:00 a.m. for SAP America, Inc.

Responses Received:

- I. Objection by the United States to the Joint Prepackaged Plan of Reorganization and Disclosure Statement of CTI Foods, LLC and its Affiliated Debtors [D.I. 165; 4/15/19]<sup>2</sup>
- J. Informal Responses
  - i. U.S. Trustee
  - ii. Second Lien Term Loan Agent
  - iii. SAP America, Inc.

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<sup>2</sup> The Debtors continue to engage in discussions with the United States regarding the objection and expect to resolve it in advance of the hearing.

Status: The Debtors have resolved Informal Responses (i) and (ii) with agreed language included in the proposed form of order and Informal Response (iii) with confirmation regarding the treatment of SAP's contract. In accordance with the Scheduling Order, the Debtors intend to submit a brief (and declaration) in support of approval of the Disclosure Statement and confirmation of the Plan, as well as a proposed form of order, by 5:00 p.m. on April 16, 2019. This matter is going forward.

Dated: April 16, 2019  
Wilmington, Delaware

/s/ Jaime Luton Chapman  
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-and-

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