

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

OLD BBP, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-12502 (LSS)

(Jointly Administered)

Hearing Date: September 10, 2020 at 10:00 a.m. (ET)

Objection Deadline: September 3, 2020 at 4:00 p.m. (ET)

**NOTICE OF MOTIONS TO (I) APPROVE GLOBAL SETTLEMENT AND  
(II) DISMISS THE ABOVE-CAPTIONED CHAPTER 11 CASES**

TO: (A) THE UNITED STATES TRUSTEE; (B) COUNSEL TO THE ABL AGENT AND ABL DIP AGENT; (C) COUNSEL TO THE TERM LOAN AGENT AND TERM LOAN DIP AGENT; (D) COUNSEL TO THE COMMITTEE; (E) ALL PARTIES THAT HAVE REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002; AND (F) ALL KNOWN CREDITORS

**PLEASE TAKE NOTICE** that on July 9, 2020, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors in the above-captioned chapter 11 cases (the “Committee”) filed the *Joint Motion of the Debtors and the Creditors’ Committee for an Order Approving Global Settlement Stipulation* [Docket No. 621] (the “Settlement Motion”). The Settlement Motion seeks approval of a settlement among the Debtors, the Committee, the Debtors’ pre-petition and post-petition secured lenders, and the buyer of substantially all of the Debtors’ assets (the “Settlement”). The Settlement provides for the creation of a creditors trust, of which holders of allowed claims will be the beneficiaries, and the transfer to the creditors trust of certain causes of action described in the Settlement.

**PLEASE TAKE FURTHER NOTICE** that on August 20, 2020, the Debtors filed the *Motion of Debtors for Entry of Orders (I) Establishing Dismissal Procedures, (II) Authorizing Dismissal of the Debtors’ Chapter 11 Cases, and (III) Granting Related Relief* (the “Dismissal Motion”) [D.I. 672]. The Dismissal Motion seeks dismissal of the above-captioned chapter 11 cases upon approval of the Settlement Motion and Settlement.

<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: Old BBP, Inc. (f/k/a Bumble Bee Parent, Inc.) (5118); Old BBH, Inc. (f/k/a Bumble Bee Holdings, Inc.) (1051); Old BBF, LLC (f/k/a Bumble Bee Foods, LLC) (0146); Old AF, LLC (f/k/a Anova Food, LLC) (2140); and Old BBC Corp. (f/k/a Bumble Bee Capital Corp.) (7816). The mailing address for the above-captioned Debtors is Old BBP, Inc., *et al.*, Attn: Albert Altro, Chief Wind Down Officer, Traverse LLC, 300 Spectrum Center Dr., Suite 400, Irvine, California 92618.

**PLEASE TAKE FURTHER NOTICE** that copies of the Settlement Motion and Dismissal Motion can be obtained either: (i) free of charge by accessing the case website maintained by the Debtors' claims agent, at the following address: <https://cases.primeclerk.com/bumblebee/>, under the "Quick Links" heading; (ii) for a fee by accessing the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov),<sup>2</sup> or (iii) by email to the Debtors' counsel, Attention: Michelle Smith ([MSmith@ycst.com](mailto:MSmith@ycst.com)).

**PLEASE TAKE FURTHER NOTICE** that any objections to the Settlement Motion or Dismissal Motion must be filed on or before **September 3, 2020 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE SETTLEMENT AND DISMISSAL MOTIONS WILL BE HELD ON SEPTEMBER 10, 2020 AT 10:00 A.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE SETTLEMENT AND DISMISSAL MOTIONS WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: August 20, 2020  
Wilmington, Delaware

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
Alan W. Kornberg  
Kelley A. Cornish  
Claudia R. Tobler  
Christopher Hopkins  
1285 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Ryan M. Bartley  
Pauline K. Morgan (No. 3650)  
Ryan M. Bartley (No. 4985)  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253

*Co-Counsel to the Debtors and Debtors in Possession*

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<sup>2</sup> A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access information on the Court's website and can be obtained through PACER at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov).