IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
QUANTUM FOODS, LLC, et al.,1) Case No. 14-10318 (KJC)
Debtors.) (Jointly Administered)
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF QUANTUM FOODS, LLC, et al.,)))
Plaintiff,)
v.) Adv. No. 14-50919 (KJC)
NEWLY WEDS FOODS, INC.,) Hearing Date: December 9, 2015 at 1:30 p.m. (ET)
Defendant.	Objection Deadline: October 30, 2015 at 4:00 p.m. (ET)
	,

NOTICE OF MOTION

TO: (A) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE, (B) COUNSEL TO CRYSTAL FINANCIAL LLC, (C) COUNSEL TO THE DEBTORS, (D) COUNSEL TO THE RECIPIENT, AND (E) ALL PARTIES REQUESTING NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO LOCAL RULE 2002-1(B)

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the "Committee") has filed the attached Motion of the Official Committee of Unsecured Creditors for Approval of Settlement Agreement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (the "Motion").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before October 30, 2015 at 4:00 p.m. (ET) (the "Objection Deadline") with the United

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Quantum Foods, LLC (9437); Quantum Foods 213-D, LLC (1862); Quantum Culinary, LLC (1302); GDC Logistics, LLC (1997); Choice One Foods, LLC (9512). The Debtors' mailing address is c/o Quantum Foods, LLC, 750 South Schmidt Road, Bolingbrook, Illinois 60440.

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 Committee so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **December 9, 2015 at 1:30 p.m. (ET)** before the Honorable Kevin J. Carey, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801, if an objection is filed.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN TH MOTION WITHOUT FURTHER NOTICE OF A HEARING.

Dated: October 13, 2015

Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Kevin S. Mann

Christopher P. Simon (No. 3697)

Michael J. Joyce (No. 4563)

Kevin S. Mann (No. 4576)

1105 N. Market Street, Suite 901

Wilmington, Delaware 19801

Telephone: (302) 777-4200

Facsimile: (302) 777-4224 csimon@crosslaw.com

mjoyce@crosslaw.com

kmann@crosslaw.com

-and-

Richard S. Lauter (IL No. 6182859)

Devon J. Eggert (IL No. 6289425)

Elizabeth L. Janczak (IL No. 6302864)

Freeborn & Peters LLP

311 South Wacker Drive, Suite 3000

Chicago, Illinois 60606-6677

Telephone: (312) 360-6000

Facsimile: (312) 360-6520

<u>rlauter@freeborn.com</u>

deggert@freeborn.com

ejanczak@freeborn.com

Special Litigation Counsel to the Official Committee of Unsecured Creditors