

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

In re:)	Chapter 11
)	
QUANTUM FOODS, LLC, <i>et al.</i> , ¹)	Case No. 14-10318 (KJC)
)	(Jointly Administered)
Debtors.)	
)	Re: Docket No. 1244
)	
THE OFFICIAL COMMITTEE OF UNSECURED)	
CREDITORS OF QUANTUM FOODS, LLC, <i>et al.</i> ,)	
)	
Plaintiff,)	
)	Adv. No. 15-50895 (KJC)
v.)	
)	Re: Adv. Docket No. 12
MOUNTAIRE FARMS, INC.,)	
)	
Defendant.)	
)	

**CERTIFICATION OF NO OBJECTION REGARDING 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 undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *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”) [Docket No. 1244, Adv. Docket No. 12] filed on September 28, 2015. The undersigned further certifies that he has reviewed the Court’s docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

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.

Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than October 15, 2015 at 4:00 p.m. (ET).

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: October 19, 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
rlauter@freeborn.com
deggert@freeborn.com
ejanczak@freeborn.com

*Special Litigation Counsel to the Official
Committee of Unsecured Creditors*