

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

AgFeed USA, LLC, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 13-11761 (BLS)

Jointly Administered

**Objection Deadline: June 4, 2014 at 4:00 p.m.**

**Hearing Date: June 10, 2014 at 10:00 a.m.**

**NOTICE OF FEE APPLICATION**

**PLEASE TAKE NOTICE** that Greenberg Traurig, LLP, co-counsel to the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases, filed the *Third Interim Fee Application* (the “**Application**”) of *Greenberg Traurig, LLP* (the “**Greenberg Traurig**”) for *Compensation and Reimbursement of Expenses for the Period from January 1, 2014 through March 31, 2014* (the “**Application Period**”), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 (the “**Court**”). Greenberg Traurig is seeking interim approval of fees in the amount of \$61,500.00 and expenses in the amount of \$3,576.50, for a total request of \$65,076.50 for the Application Period.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the relief sought in the Application must be filed with the Court at 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, DE 19801 on or before **June 4, 2014 at 4:00 p.m. (Prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that you must also serve such response or objection upon: (i) the Debtors, 510 South 17th Street, Suite 104, Ames, Iowa 50010 (Attn:

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<sup>1</sup> The Debtors and the last four digits of their federal tax identification number are: AgFeed USA, LLC (8748); AgFeed Industries, Inc. (7168); TS Finishing, LLC (8748); New York Finishing, LLC (8748); Pork Technologies, LC (2076); New Colony Farms, LLC (9246); Heritage Farms, LLC (8141); Heritage Land, LLC (8129); Genetics Operating, LLC (1921); M2P2 Facilities, LLC (8748); MGM, LLC (8748); M2P2 General Operations, LLC (8748); New Colony Land Company, LLC(5834); M2P2 AF JV, LLC (8748); Midwest Finishing, LLC (8748); and Genetics Land, LLC (1921). The location of the corporate headquarters for AgFeed Industries, Inc. is 100 Bluegrass Commons Blvd., Suite 310, Hendersonville, Tennessee 37075. The location of the corporate headquarters for the remaining Debtors is 510 South 17th Street, Suite 104, Ames, Iowa 50010.

Keith A. Maib, Chief Restructuring Officer); (ii) counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Robert S. Brady); (iii) the Office of the United States Trustee, 844 King St., Suite 2207, Wilmington, DE 19801 (Attn: David Buchbinder); (iv) counsel to the Committee, Lowenstein Sandler, LLP, 65 Livingston Avenue, Roseland, NJ 07068, Attn: Jeffrey D. Prol and Timothy R. Wheeler and Greenberg Traurig, LLP, 1007 N. Orange Street, Suite 1200, Wilmington, Delaware 19801, Attn: Sandra G. M. Selzer, and Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, IL 60601, Attn: Nancy A. Peterman. and Matthew T. Gensburg.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING WILL BE HELD ON THE APPLICATION ON JUNE 10, 2014 AT 10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE BRENDAN L. SHANNON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.**

Dated: May 15, 2014

GREENBERG TRAURIG, LLP

/s/ Sandra G. M. Selzer

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-and-

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*Co-Counsel to the Official Committee of Unsecured  
Creditors*