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PROPOSED COUNSEL TO THE **DEBTORS AND DEBTORS IN POSSESSION**

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

In re:	§ §	Chapter 11
	§	1
FRESH ACQUISITIONS, LLC, et al., 1	§	Case No. 21-30721 (SGJ)
Debtors.	§ § §	(Jointly Administered)
	_ 0	

NOTICE OF REVISED PROPOSED ORDER (I) AUTHORIZING THE REJECTION OF CERTAIN LEASES, (II) AUTHORIZING THE ABANDONMENT OF CERTAIN PROPERTY, AND (III) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on April 30, 2021, the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the *Debtors' Second Motion for Entry of* an Order (I) Authorizing Rejection of Certain Leases, (II) Authorizing the Abandonment of Certain

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Alamo Fresh Payroll, LLC (1590); Fresh Acquisitions, LLC (2795); Alamo Ovation, LLC (9002); Buffets LLC (2294); Hometown Buffet, Inc. (3002); Tahoe Joe's Inc. (7129); OCB Restaurant Company, LLC (7607); OCB Purchasing, Co. (7610); Ryan's Restaurant Group, LLC (7895); Fire Mountain Restaurants, LLC (8003); Food Management Partners, Inc. (7374); FMP SA Management Group, LLC (3031); FMP-Fresh Payroll, LLC (8962); FMP-Ovation Payroll, LLC (1728); and Alamo Buffets Payroll, LLC (0998). The Debtors' principal offices are located at 2338 N. Loop 1604 W., Suite 350, San Antonio TX, 78248, United States.

Property and (III) Granting Related Relief [Docket No. 97] (the "Motion"). A proposed order granting the Motion was attached thereto as Exhibit A (the "Original Proposed Order").

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit A</u> is a revised proposed *Order (I) Authorizing the Rejection of Certain Leases, (II) Authorizing the Abandonment of Certain Property, and (III) Granting Related Relief* (the "Revised Proposed Order").

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a redline of the Revised Proposed Order marked against the Original Proposed Order.

Respectfully submitted this 24th day of May, 2021.

GRAY REED

By: /s/ Jason S. Brookner

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CERTIFICATE OF SERVICE

I certify that on May 24, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner