Jason S. Brookner
Texas Bar No. 24033684
Aaron M. Kaufman
Texas Bar No. 24060067
Amber M. Carson
Texas Bar No. 24075610
GRAY REED
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
akaufman@grayreed.com
acarson@grayreed.com

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
FRESH ACQUISITIONS, LLC, *et al.*,[1]	§	Case No. 21-30721 (SGJ)
Debtors.	§	(Joint Administration Requested)

WITNESS AND EXHIBIT LIST FOR FIRST DAY HEARINGS

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby file this *Witness and Exhibit List for First Day Hearings* on April 22, 2021, at 9:30 a.m. (Central Time) via WebEx.

[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.

WITNESSES

The Debtors may call one or more of the following witnesses at the hearing, live or by declaration:

1. Vineet Batra, Independent Director of the Debtors;
2. Mark Shapiro, Chief Restructuring Officer of the Debtors;
3. Tinamarie Feil, President of Client Services and co-founder of BMC Group, Inc.;
4. All witnesses called by any other party; and
5. Any witnesses necessary for rebuttal depending upon the witnesses and evidence presented by other parties.

EXHIBITS

The Debtors designate the following exhibits:

EXHIBIT NUMBER	DESCRIPTION	MARKED	OFFERED	OBJECT	ADMIT	DATE	DISPOSITION AFTER TRIAL
1.	*Debtors' Emergency Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases and Granting Related Relief* [Docket No. 2]						
2.	*Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 3]						
3.	*Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs, and (II) Granting Related Relief* [Docket No. 4]						

EXHIBIT NUMBER	DESCRIPTION	MARKED	OFFERED	OBJECT	ADMIT	DATE	DISPOSITION AFTER TRIAL
4.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Serve a Consolidated List of Creditors and a Consolidated List of the 30 Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates, and (IV) Granting Related Relief* [Docket No. 6]						
5.	*Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(b)(9) Claimants and (B) PACA/PASA Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief* [Docket No. 7]						
6.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Continue to Operate Their Cash Management System and Perform Intercompany Transactions, and (II) Granting Related Relief* [Docket No. 8]						
7.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing Rejection of Certain Leases, and (II) Authorizing the Abandonment of Certain Property and (III) Granting Related Relief* [Docket No. 9]						
8.	*Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief* [Docket No. 10]						
9.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief* [Docket No. 11]						

EXHIBIT NUMBER	DESCRIPTION	MARKED	OFFERED	OBJECT	ADMIT	DATE	DISPOSITION AFTER TRIAL
10.	*Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief* [Docket No. 12]						
11.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Insurance Policies and Honor all Obligations in Respect Thereof, and (B) Renew, Supplement, and Enter into New Insurance Policies* [Docket No. 13]						
12.	*Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief* [Docket No. 14]						
13.	*Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief* [Docket No. 16]						
14.	*Attorney Checklist Concerning Motions and Orders Pertaining to Use of Cash Collateral and Post-Petition Financing (Which are in Excess of Ten (10) Pages)* [Docket No. 17]						

EXHIBIT NUMBER	DESCRIPTION	MARKED	OFFERED	OBJECT	ADMIT	DATE	DISPOSITION AFTER TRIAL
15.	*Declaration of Mark Shapiro, Chief Restructuring Officer, in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief* [Docket No. 18]						
16.	*Declaration of Vineet ("Vin") Batra in Support of Debtors' Emergency Motion For Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief* [Docket No. 19]						
17.	*Declaration of Mark Shapiro, Chief Restructuring Officer, in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 20]						
18.	*Debtors' Emergency Application for Entry of an Order (I) Authorizing the Employment and Retention of BMC Group, Inc. as Claims, Noticing, and Solicitation Agent and (II) Appointing BMC Group, Inc. as Administrative Agent* [Docket No. 21]						
19.	*Declaration of Tinamarie Feil in Support of Debtors' Emergency Application for Entry of an Order (I) Authorizing the Employment and Retention of BMG Group, Inc. as Claims, Noticing, and Solicitation Agent and (II) Appointing BMC Group, Inc. as Administrative Agent* [Docket No. 21, Exhibit A]						
20.	Any exhibits offered by any other party						

The Debtors reserve the right to use and/or present demonstratives for any purpose. The Debtors also reserve the right to use exhibits, demonstratives, and testimony not listed here for

impeachment purposes at the hearing.

The Debtors reserve the right to supplement or amend this Witness and Exhibit List any time prior to the hearing.

Respectfully submitted this 21st day of April, 2021.

GRAY REED

By: */s/ Jason S. Brookner*

Jason S. Brookner
Texas Bar No. 24033684
Aaron M. Kaufman
Texas Bar No. 24060067
Amber M. Carson
Texas Bar No. 24075610
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
akaufman@grayreed.com
acarson@grayreed.com

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CERTIFICATE OF SERVICE

I certify that on April 21, 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

Exhibits 1-19

[As filed at the respective Docket Nos. listed above.]