

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

**FILED**  
**JUN 28 2021**  
CLERK, U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

**In re:** )  
)  
**FRESH ACQUISITIONS, LLC** )  
)  
**Debtor** )

**Case No. 21-30721**  
**Chapter 11**  
**Judge: Stacey G. Jernigan**

**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND PLEADINGS**

The Metropolitan Trustee of the Metropolitan Government of Nashville and Davidson County ("Metro"), a secured creditor in the above referenced proceedings, through undersigned counsel, hereby files this Notice of Appearance pursuant to Section 1109 (b) of the Bankruptcy Code and requests notice of all pleadings, documents, and papers filed in this case.

Electronic notice should also be sent to:

[alex.blonder@nashville.gov](mailto:alex.blonder@nashville.gov)

[alex.dickerson@nashville.gov](mailto:alex.dickerson@nashville.gov)

[lorraine.abrams@nashville.gov](mailto:lorraine.abrams@nashville.gov)

Paper mailing for the first pleading initiating a potential LBR 9013 contested matter must be sent in accordance with the FRBP to:

**Alex S. Blonder**  
**Assistant Metropolitan Attorney**  
**108 Metropolitan Courthouse**  
**P.O. Box 196300**  
**Nashville, TN 37219-6300**

Respectfully submitted this 19th day of May 2021.

THE DEPARTMENT OF LAW OF THE  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON COUNTY  
BOB COOPER, #010934  
DIRECTOR OF LAW

**/s/ Alex S. Blonder**

Alex S. Blonder #037501

R. Alex Dickerson, #27184

Assistant Metropolitan Attorney

108 Metropolitan Courthouse

P.O. Box 196300

Nashville, TN 37219-6300

(615)862-6378 – Telephone

(615)862-6352 - Facsimile

[alex.blonder@nashville.gov](mailto:alex.blonder@nashville.gov)

**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing has been this date served via U. S. Postal Service to the parties listed below.

Jason S. Brookner  
Gray Reed & McGraw, P.C.  
1601 Elm Street, Suite 4600  
Dallas, TX 75201

Us Trustee (Dallas)  
1100 Commerce Street  
Room 976  
Dallas, TX 75242

Dated this 19th day of May 2021.

**/s/ Alex S. Blonder**

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Alex S. Blonder

*Assistant Metropolitan Attorney*

June 23, 2021

Clerk's Office  
1100 Commerce Street  
Room 1254  
Dallas, TX 75242

**RECEIVED**

JUN 28 2021

CLERK, U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

RE: Fresh Acquisitions, LLC  
Chapter 11 Case 21-30721  
Judged: Stacey G. Jernigan

To the Clerk:

Enclosed is a Notice of Appearance and Request for Service of Notices and Pleadings for The Metropolitan Trustee of the Metropolitan Government of Nashville and Davidson County ("Metro"), as represented by attorney Alex Blonder.

On May 19, 2021, I mailed the Notice to Jason S. Brookner and the U.S. Trustee (Dallas), but our document did not appear on the Docket Report.

On June 9, 2021, I mailed a copy to the claims agent, BMC Group, in Hawthorne, CA. Our notice still has not been listed on the Docket Report.

Today, I enclose with our Notice an additional copy with a self-addressed, postage-paid envelope. Would you please aid us in getting our Notice submitted, and send a "Received" copy to our office in the enclosed envelope?

If we need to do anything additional in order to become a valid creditor, please let me know.

Thank you.



Lorraine Abrams  
Bankruptcy Paralegal  
Metro Legal Department  
P. O. Box 196300  
Nashville, TN 37219-6300

615-862-6351

[lorraine.abrams@nashville.gov](mailto:lorraine.abrams@nashville.gov)

enclosures