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-11
	§	
Debtors.	§	(Jointly Administered)
	§	
	§	

ARTHUR N. RUPE FOUNDATION'S JOINDER IN THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OBJECTION TO DEBTOR'S EXPEDITED MOTION TO EXTEND THE EXCLUSIVE PERIOD TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF

Creditor Arthur N. Rupe Foundation ("<u>ANRF</u>") files this *Joinder* in the objection filed by the Official Committee of Unsecured Creditors [Dkt. No. 350] (the "<u>Objection</u>") to the *Debtor's Expedited Motion to Extend the Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Dkt. No. 334] (the "<u>Motion</u>").

WHEREFORE ANRF respectfully requests that the Court deny the relief sought in the Motion for all of the reasons stated in the Objection, and that this Court grant ANRF such other and further relief to which it may be justly entitled.

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.

DATED: August 16, 2021

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

/s/ Michaela C. Crocker

Michaela C. Crocker, TX Bar No. 24031985 Jorge A. Solis, TX Bar No. 18826750 Aron Cooper, TX Bar No. 24050143 2121 N. Pearl St., Suite 1100 Dallas, TX 75201

Telephone: (469) 627-7070 Email: jorge.solis@katten.com

Email: michaela.crocker@katten.com Email: aron.cooper@katten.com

Counsel for Arthur N. Rupe Foundation

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2021, a true and correct copy of the foregoing was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in these cases pursuant to the Electronic Filing Procedures in this District.

/s/ Michaela C. Crocker Michaela C. Crocker