

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

In re: Fresh Acquisitions, LLC, et al.,¹ <p style="text-align: center;">Debtors.</p>	§ § § § § § § § §	Chapter 11 Case No. 21-30721-SGJ-11 (Jointly Administered)
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**ARTHUR N. RUPE FOUNDATION’S JOINDER IN THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS’ INITIAL
OBJECTION TO PROPOSED SALE OF DEBTORS’ ASSETS**

Creditor Arthur N. Rupe Foundation (“**ANRF**”) files this *Joinder* in the objection filed by the Official Committee of Unsecured Creditors [Dkt. No. 296] (the “**Objection**”) to the proposed sale of the Debtors’ assets set forth in the *Motion for (I) an Order (A) Approving Bidding Procedures and Certain Bid Procedure, (B) Scheduling Bid Deadline, Auction Date, and Sale Hearing and Approving Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; and (II) an Order Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of Liens, Claims and Interests* [Dkt. No. 165] (the “**Sale Motion**”).

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.

WHEREFORE ANRF respectfully requests that the Court deny the relief sought in the Sale 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.

DATED: August 20, 2021

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

/s/ Michaela C. Crocker

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 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