

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

<b>In re</b>	§ <b>Chapter 11</b>
	§
<b>Fresh Acquisitions, LLC, et al.<sup>1</sup></b>	§ <b>Case No. 21-30721-SGJ-11</b>
	§
<b>Debtors.</b>	§ <b>(Jointly Administered)</b>

**SEGURA INVESTORS XII-XVI, LLC’S JOINDER IN THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS’ INITIAL  
OBJECTION TO PROPOSED SALE OF DEBTORS’ ASSETS**

Creditors Segura Investors XII-XVI, LLCs (“**Segura Investors**”) files this *Joinder* in the objection filed by the Official Committee of Unsecured Creditors [DKT. NO. 296] to the proposed sale of the Debtor’s 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**”).

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<sup>1</sup>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 Debtor’s principal offices are located at 2338 N. Loop 1604 W., Suite 350, San Antonio TX, 78248, United States.

WHEREFORE Segura Investors 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 Segura Investors such other and further relief to which it may be justly entitled.

DATED: August 20, 2021

Respectfully submitted

**EPHRON & BARENHOLTZ**

*/s/ Brett Barenholtz*

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2021, a true and correct copy of the above pleading 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/ Brett Barenholtz*

Brett Barenholtz