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

IN RE: § CASE NO. 21-30721-hdh11

§

FRESH ACQUISITIONS, LLC § CHAPTER 11

§

DEBTOR

## AGREEMENT PURSUANT TO RULE 4001(D) CONCERNING LAURA ALVERSON'S PERSONAL INJURY SUIT AGAINST COMMERCIAL INSURANCE CARRIER

There came on for consideration before this Court this Agreed Order between Fresh Acquisitions, LLC's affiliates ("Debtor") and Laura Alverson ("Movant"). The parties have reached an agreement as evidenced by the signatures of their respective attorney of record on this Order.

- The automatic stay is immediately terminated as to Laura Alverson and she may continue her state court action, which is pending in Warren County, KY, Warren Circuit Court, Div. I, Case No. 19-CI-00374, against FMP-Ovation Payroll, LLC, Et Al.
- 2. Laura Alverson is to look solely to the commercial general liability policy for satisfaction of any settlement and/or judgment the Movant may obtain against the affiliates of Fresh Acquisitions, LLC.

APPROVED AS TO FORM AND SUBSTANCE:

/s/C. Daniel Herrin C. Daniel Herrin Herrin Law, PLLC Bar#: 24065409 4925 Greenville Ave., Suite 455 Dallas, TX 75206 dherrin@herrinlaw.com 469-607-8551 ATTORNEY FOR CREDITOR LAURA ALVERSON

/s/ Jason S. Brookner Jason S. Brookner Gray Reed & McGraw LLP 1601 Main Street Suite 4600 Dallas, TX 75201 469-320-6132 214-953-1332 (fax) jbrookner@grayreed.com

ATTORNEY FOR DEBTOR