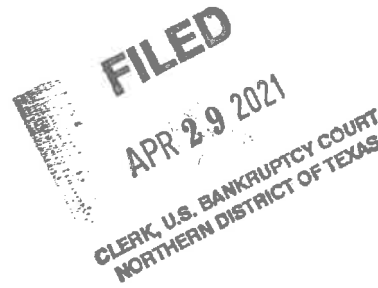


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Attorney for TYERELL MACK



**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS**

IN RE:)	Case No. 21-30721-SGJ
)	
FRESH ACQUISITIONS, LLC)	Chapter 11
)	
Debtor(s):)	Jointly Administered
)	
)	
)	

**CREDITOR TYERELL MACK ON BEHALF OF HIMSELF AND ALL OTHER AGGRIEVED
EMPLOYEES' UNOPPOSED MOTION TO WAIVE THE LOCAL COUNSEL
REQUIREMENT UNDER L.B.R. 2090-4**

Creditor, TYERELL MACK (“Mack” and/or “Creditor”), files this Unopposed Motion to Waive the Local Counsel Requirement Under L.B.R. 2090-4, and in support thereof, would show the Court as follows:

1. On April 20, 2021 (the “Petition Date”), each Debtor file a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. On April 20, 2021, the Court entered an Order [Dkt No. 2] Authorizing Joint Administration of these Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b).
3. Creditor is represented by the law firm of GrahamHollis APC, 3555 Fifth Avenue, Suite 200, San Diego, California 92103 (the “Firm”) in the bankruptcy lead case In Re: Fresh Acquisitions, LLC, et al, Case No. 21-30721-11. Nathan Reese is an associate in the Firm, resides in San Diego, California.

4. Mr. Reese is filing an Application to Appear Pro Hac Vice for all future proceedings on this case matter.

6. Creditor respectfully requests that the Court waive the local counsel requirement under L.B.R. 2090-4 for the above titled bankruptcy. Mr. Reese is available to attend hearings in this Court, including hearings set on an expedited basis, and will comply in all respects with the Local Rules of the Northern District of Texas.

7. On April 28, 2021, counsel for Tyerell Mack emailed Jason Brookner, counsel for Debtor, concerning the relief sought herein. Mr. Brookner has communicated they are unopposed to this Motion.

WHEREFORE, Creditor, Tyerell Mack, respectfully requests that its Unopposed Motion to Waive the Local Counsel Requirement Under L.B.R. 2090-4 be granted in all things and that Creditor be granted all further relief to which it may be entitled.

Respectfully submitted,

Dated: April 28, 2021

GRAHAMHOLLIS APC

By: */s/ Nathan J. Reese*

NATHAN REESE

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Attorney for Creditor TYERELL MACK

CERTIFICATE OF CONFERENCE

I hereby certify that on July 28, 2020, I emailed Jason S. Brookner, counsel for Debtor, Amber M. Carson and Aaron M. Kaufman, counsel for the Fresh Acquisitions, LLC, concerning the relief sought herein. Mr. Brookner stated they were unopposed to this Motion.

/s/ Nathan J. Reese

Nathan Reese

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 28, 2021, a true and correct copy of the foregoing Motion was served electronically on all parties listed below via the court's CM/ECF electronic filing system.

Jason S. Brookner
Amber M. Carson
Aaron M. Kaufman

Email: jbrookner@gravreed.com
Email: acarson@gravreed.com
Email: akaufman@gravreed.com