IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	)	**Chapter 11**
	)	
PIKE NURSERY HOLDING LLC,	)	**Case No. 07-79129-mgd**
	)	
Debtor.	)	

DEBTOR'S LIMITED OBJECTION TO MOTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER DIRECTING THE DEBTOR TO PRODUCE DOCUMENTS PURSUANT TO FED.R.BANKR.P. 2004

COMES NOW Pike Nursery Holding LLC ("Debtor"), Debtor and Debtor-in-Possession herein ("Debtor"), by and through the undersigned counsel, and files this Limited Objection to Motion of Official Committee of Unsecured Creditors for an Order Directing the Debtor to Produce Documents Pursuant to Fed.R.Bankr.P. 2004 (the "Objection"). In support of its Objection, the Debtor shows the Court as follows:

INTRODUCTION

1.

On November 14, 2007 (the "Petition Date"), the Debtor filed its voluntary Petition for relief under Chapter 11, Title 11, of the Bankruptcy Code (the "Bankruptcy Code"). The Debtor is continuing in possession of its property and is operating and managing its business as a debtor-in-possession, pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

2.

An official committee of unsecured creditors (the "Committee") was appointed on November 19, 2007, but no trustee or examiner has been appointed in this case.

3.

The Debtor operates a wholesale and retail nursery business from approximately 25 leased

and owned locations in three states.

4.

On January 22, 2008, the Committee filed its Motion of Official Committee of Unsecured Creditors for an Order Directing the Debtor to Produce Documents Pursuant to Fed.R.Bankr.P. 2004 (the "2004 Motion"). In the 2004 Motion, the Committee sought production of forty-one (41) categories of documents from the Debtor.

GENERAL OBJECTIONS

5.

The Debtor's primary objection to the requests set forth in the 2004 Motion (the "Requests") is that the Requests seek documents or information previously produced to the Committee or which are outside the Debtor's possession, custody or control. Contrary to the Committee's assertion that they have requested but not been provided with information and documents, the Debtor has produced a tremendous volume of documents to the Committee in an effort to provide the Committee with information which the Committee believed was necessary or relevant for its evaluation of the Debtor's ongoing operation and any potential sale, restructuring or financing alternatives. Furthermore, the Debtor has allowed the Committee's consultants from Aurora Management Partners ("Aurora") to be present on-site and has given them virtually unlimited access to the Debtor's financial records. In addition, the Debtor has made its employees and its financial advisors available to meet and talk with Aurora. The Debtor and its advisors have spent a considerable amount of time working with Aurora to provide the Committee with the information it sought and to answer any questions the Committee may have had. Attached hereto as Exhibit A is a non-exhaustive list of documents previously produced by the Debtor to the Committee. The majority of the documents on Exhibit A are contained in an electronic database to which both Mr. Mercer and

Mr. Pomerantz were given access. To date, neither Mr. Mercer nor Mr. Pomerantz have even logged onto the database to survey the documents contained therein. Additionally, the Debtor has provided Ron Turcotte and Lynn Huras, the Committee's financial consultants with access to the database. Only Ms. Huras has accessed the database to review any documents contained therein.

6.

The Debtor further objects to the Requests because, when taken as a whole, the scope and breadth are vastly overbroad and production of such documents is unduly burdensome on the Debtor, particularly at this juncture in the case. In light of the Debtor's ongoing efforts to actively pursue a sale, restructuring or financing of its business in the near future, and the necessity for the Debtor's employees to focus on these efforts while simultaneously conducting its day to day business, the Committee's remaining Requests are vastly overbroad and unduly burdensome. Moreover, many of the requests are historical in nature and relate to corporate organization and management. While the Committee may have a legitimate need to review some of these documents at some point in the future, to do so on an emergency basis is unjustified.

7.

The Debtor objects to the Requests to the extent that these Requests call for disclosure of information subject to the attorney-client privilege or other privilege, or the work product doctrine.

8.

The Debtor objects to the Requests on the basis that the Requests are calculated, or would operate, to oppress and unduly burden or unduly cause expense to the Debtor. Moreover, the Requests are unduly vexatious or unduly burdensome to respond.

9.

The Debtor objects to the Requests, and the accompanying instructions and definitions, to

the extent that they are inconsistent with or would expand the obligations imposed by the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, or the Bankruptcy Court's Local Rules.

10.

SPECIFIC OBJECTIONS

In addition to the aforementioned general objections, the Debtor asserts the following specific objections to the Requests:

Request No. 1 All appraisals for any of the Debtor's assets prepared during the three years preceding the Petition Date other than the final draft of the Hilco appraisal but including all documents pertaining to such appraisal.

Response No. 1 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 2 Material communications of the Debtor with its lenders, including, but not limited to, PNC Bank ("PNC"), Bank of America, N.A. ("Bank of America") and PDIP LLC ("PDIP"), sent or received during the three years preceding the Petition Date, including all borrowing base certificates and all compliance reports prepared by the Debtor or its auditors and any waivers provided to any of the lenders.

Response No. 2 The Debtor objects to Request No. 2 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has previously produced its 2005 and 2006 borrowing base certificates.

Request No. 3 Off-balance sheet liabilities of the Debtor not appearing in the Debtor's most recent financial statements.

Response No. 3 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 4 The Debtor's inventory schedule and inventory turn report (preferably in Excel format) by location down to "class" level only.

Response No. 4 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 5 A detailed, non-summary schedule of any accrued and miscellaneous postpetition liabilities not included in accounts payable (preferably in Excel format).

Response No. 5 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 6 Monthly sales information by store for fiscal year 2005 as well as historical sale information and analysis for fiscal year 2004, 2005, 2006, 2007, and year-to-date 2008 by product down to "class" level only.

Response No. 6 The Debtor has already produced all non-objectionable responsive documents pertaining to fiscal years 2005, 2006, 2007 and 2008 YTD. The Debtor objects to the remainder of Request No. 6 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 7 Copies of all documents provided to the Office of the United States Trustee as part of the Debtor's initial reporting requirements.

Response No. 7 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 8 Minutes from all meetings of the Debtor's board of directors for the three years preceding the Petition Date, including materials submitted to the board in connection with such meetings.

Response No. 8 The Debtor objects to Request No. 8 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 9 Investments by, loans from and/or transfers (as that term is defined in the Bankruptcy Code) to Roark Capital Group, Inc., Roark-Pike LLC, PDIP, and Roark-Pike Manager LLC (collectively, "Roark"), the current and former officers and directors of the Debtor, any other insiders (as that term is defined in the Bankruptcy Code) of the Debtor on the one hand and the Debtor on the other hand.

Response No. 9 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 10 All documents and agreements (other than copies of the Debtor's real property leases) evidencing other financial arrangements of the Debtor entered into or amended since Roark acquired the Debtor, including sale and repurchase or leaseback arrangements, capitalized leases, real estate and other installment purchases and equipment leases, securitization programs and agreements to loan funds to third parties.

Response No. 10 The Debtor objects to Request No. 10 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has previously produced the Revolving Credit & Security Agreement with PNC Bank, the Construction Loan Agreement with Bank of America, its equipment leases and its operating contracts and leases.

Request No. 11 Any consulting, employment or similar agreements with any of the members of the Pike family which were in effect, entered into or extended during the three years preceding the Petition Date.

Response No. 11 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 12 Any agreements relating to the ownership and control of the Debtor (including, but not limited to limited liability or membership agreements, voting trusts and agreements and proxies (whether revocable or irrevocable)).

Response No. 12 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 13 Any joint venture, partnership, strategic alliance or other management, operating or consulting agreements entered into by the Debtor in the three years preceding the Petition Date.

Response No. 13 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 14 All material divestiture, acquisition, buy-back agreements and related documents entered into by the Debtor, or which were extended or otherwise in effect, in the three years prior to the Petition Date.

Response No. 14 The Debtor objects to Request No. 14 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 15 Any agreements between the Debtor and third parties pursuant to which a third party is providing professional services to the Debtor including, but not limited to, accounting, financial advisory, management, appraisal or marketing services.

Response No. 15 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 16 The sale/leaseback transactions and the associated distribution of proceeds to Roark involving the Debtor's property including, but not limited to, the sale/leaseback transaction with Spirit Finance Corp. and John Gelzer, Jr. as well as the sale and leasing back by the Debtor of

any other real or personal property outside of the ordinary course of business during the three years prior to the Petition Date including all agreements, memoranda of understanding, etc. associated with such sale/lease-back transactions, including, but not limited to, appraisals for the properties subject to the transaction and the closing statement showing the flow of funds in this transaction.

Response No. 16 The Debtor objects to Request No. 16 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 17 Any offers, written or oral, received by the Debtor or agreement of the Debtor for the sale or lease of any of its assets outside of the ordinary course of business during the three years preceding the Petition Date.

Response No. 17 The Debtor objects to Request No. 17 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has previously produced the closing statement and the promissory note related to the Hillendale house.

Request No. 18 Any agreement pursuant to which the Debtor sold assets to a third party out of the ordinary course of business during the three years prior to the Petition Date.

Response No. 18 The Debtor objects to Request No. 18 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 19 All documents relating to the Debtor's purchase of assets in 2004 from Pike Nurseries, Inc.

Response No. 19 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 20 All agreements entered into by the Debtor, or which were extended or otherwise in effect, in the three years prior to the Petition Date, with any current or former insider of the Debtor, Roark, any insider (as that term is defined in section 101 of the Bankruptcy Code) of Roark, or any affiliate (as that term is defined in section 101 of the Bankruptcy Code) of Roark.

Response No. 20 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 21 All contracts or agreements entered into during the three years prior to the Petition Date, which are with or pertain to the Debtor, and to which directors, officers or holders of 5% or more of the Debtor's membership interests are parties.

Response No. 21 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 22 All of the Debtor's federal and state income tax returns including, but not limited to, the returns for the years 2004, 2005, and 2006.

Response No. 22 The Debtor objects to Request No. 17 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has previously produced the Debtor's 2005 and 2006 Federal tax returns.

Request No. 23 Any tax refund applications pending or filed by the Debtor with any tax agency during the last three years.

Response No. 23 The Debtor objects to Request No. 23 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 24 A detailed current accounts receivable aging report.

Response No. 24 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 25 Copies of any business plan (or financial projection) prepared by the Debtor during or after 2004.

Response No. 25 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 26 Aged accounts postpetition aged accounts payable listing (preferably in Excel format).

Response No. 26 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 27 The Debtor's cash disbursement journal(s) for the one (1) year prior to the Petition Date (preferably in Excel format).

Response No. 27 The Debtor objects to Request No. 27 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has provided a detailed listing of all disbursements made by the Debtor within the 90 days, or in the event of insiders within one year, prior to the Petition Date.

Request No. 28 Bank reconciliation(s), bank statement(s), and corporate credit card statements for the three years prior to the Petition Date for three (3) years prior to the Petition Date.

Response No. 28 The Debtor objects to Request No. 28 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 29 The Debtor's interests in (a) Echelon; (b) Garden Retail Marketing, LLC; and (c) Smokerise Golf & Country Club including when the interest was acquired, the nature of the underlying business, whether the business is an insider or affiliate of the Debtor and whether the Debtor believes that liquidating such interests will generate meaningful value for the estate.

Response No. 29 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 30 Payments on the promissory notes listed the Debtor's schedules.

Response No. 30 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 31 The Debtor's claims against James M. Ary, Robert B. King, Dan Jason Rogers, and Chadwick Carroll for violations of their non-compete agreements including such agreements.

Response No. 31 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 32 The Debtor's tax liabilities including information pertaining to the taxing authority, the nature of the tax (i.e., income, sales, personal property, real property), the year the tax claims cover, the amount, and whether the Debtor disputes any such claims.

Response No. 32 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 33 Money paid pursuant to the first day wage order and the amount of the claims that remain, and for those claims that remain, their general purpose.

Response No. 33 The Debtor objects to Request No. 33 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 34 The alleged claim of $831,051.00 listed on Schedule F for Roark Capital Group.

Response No. 34 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 35 Payments to current and former insiders during the one year period prior to the bankruptcy filing.

Response No. 35 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

Request No. 36 Supporting documentation pertaining to all payments made to the Debtor's current and former attorneys, accountants, and consultants for the three years prior to the Petition Date.

Response No. 36 Debtor objects on the grounds that such information seeks disclosure of information subject to the attorney-client privilege or other privilege, or the work product doctrine. Moreover, the Debtor objects to Request No. 36 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 37 The transfer made to John Gelzer, Jr. of the 6100 Lawrenceville Highway, Tucker, Georgia, property in December 2005 that is listed on the Statement of Financial Affairs ("SOFA").

Response No. 37 The Debtor objects to Request No. 37 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests. Notwithstanding the aforementioned objections, the Debtor has already produced the closing statement and related documents.

Request No. 38 The corporate governance of the Debtor including, but not limited to, minutes, resolutions, and any notes from board meetings as well as all organizational documents of the Debtor, including but not limited to corporate articles, by-laws, amendments, shareholder agreements and memoranda and correspondence pertaining to the foregoing.

Response No. 38 The Debtor objects to Request No. 38 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 39 The financial, accounting or auditing records, any audits of the Debtor including, but not limited to, audit files, work papers, desk files, and the like.

Response No. 39 The Debtor objects to Request No. 39 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 40 All transactions or agreements (including engagement agreements and conflict waivers) with professional firms or individual professionals including, but not limited to, law firms, accounting firms, turnaround firms, consulting firms current or previously retained by or performing services either directly or indirectly on behalf of the Debtor.

Response No. 40 Debtor objects on the grounds that such information seeks disclosure of information subject to the attorney-client privilege or other privilege, or the work product doctrine. Moreover, the Debtor objects to Request No. 40 on the grounds that it is unduly burdensome to respond in light of the vastness and totality of the Requests.

Request No. 41 All private placement memoranda and similar documents relating to raising capital (whether debt or equity) for the Debtor.

Response No. 41 The Debtor has already produced all non-objectionable responsive documents to the extent they exist and are in the possession, custody and control of the Debtor.

10.

The Debtor has produced all requested information which is reasonably necessary to evaluate the Debtor's ongoing operations and any potential sale, restructuring or financing alternatives which may be proposed by the Debtor. Relevant documents are being retained and any purchaser of assets will be required to ensure the continuing availability of any corporate or business records which may be transferred (to the extent the Debtor does not retain copies or backups). The remaining information sought by the Committee may arguably relate to potential causes of action (which the Committee may or may not have standing to raise); however, the production of such documents at this time is not necessary and is unduly burdensome on the Debtor. The Debtor's employees and advisors need to focus on pursuing and evaluating sale, restructuring or financing alternatives at this juncture. Any potential sale would include the ability for the Debtor to access and utilize the books and records of the company to the extent necessary to administer the Debtor's estate and would not include the sale of corporate records such as minute books, resolutions, etc.; therefore, there is no harm in delaying production of any further documents until such time as the production becomes relevant and the Debtor has the time and resources to do so.

WHEREFORE, the Debtor respectfully prays that this Court sustain its Objection and deny entry of an order requiring the production of any additional documents at this time.

This 1st day of February, 2008.

Respectfully submitted,

SCROGGINS & WILLIAMSON

/s/ Ashley R. Ray
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Georgia Bar No. 765214
ASHLEY REYNOLDS RAY
Georgia Bar No. 601559
Counsel for the Debtor

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EXHIBIT A

Financial Information:

2006 Federal Income Tax Return
2005 Pike Audit
2006 Pike Audit
2007 Pike Audit
P&L 12MTH 2005
P&L 12MTH 2006
P&L 12MTH 2007 YTD
P&L 11-29-07
Balance Sheet- Period 1 - FY 08
Balance Sheet- Period 5 - FY 08
Balance Sheet- Period 6 - FY 08
Balance Sheet- Period 9 - FY 08
Balance Sheet- Period 10 - FY 08
Balance Sheet- Period 11 - FY 08
Accounts Receivable Aging 10-02-07
Notes Receivable Trade
Prepaid Detail
Inventory Report - 12-07-07
Borrowing Base Calculations 11-01-07 AR
AR Summary 02-03-05 FYE
AR Summary 02-02-06 FYE
AR Summary 03-01-07
AR Summary 04-05-07
AR Summary 05-03-07
AR Summary 05-31-07
AR Summary 07-05-07
AR Summary 08-02-07
AR Summary 08-30-07
AR Summary 10-04-07
AR Summary 11-01-07
AR Summary 11-29-07
AR Summary 02-01-07 FYE
AR Summary 01-03-08
Accounts Payable 11/7/2007
Balance Sheet at 11-13-07 - Revised 12-10-07
Balance Sheet detail
GL Summary at 11-13-07
Deferred Rent Schedule
Balance Sheet 11-29-07
October 2007 internal statements, general ledger and trial balance
Comprehensive fixed asset report and depreciation schedule

Income Statement- Period 1 - FY 08
Income Statement- Period 10 - FY 08
Pike Consulting - EBITDA Adjustments
Roark-Pike Mgt Fees - EBITDA Adjustments
EBITDA Adjustments
2005 Marketing and Advertising Expenses
2006 Marketing and Advertising Expenses
2007 Marketing and Advertising Expenses
Labor and Sales Trend 1-03-08
Financials - Period 2 - FY 08
Financials - Period 3 - FY 08
Financials - Period 4 - FY 08
Financials - Period 5 - FY 08
Financials - Period 6 - FY 08
Financials - Period 7 - FY 08
Financials - Period 8 - FY 08
Financials - Period 9 - FY - 08
Monthly Financials - FY 07
Monthly Financials - FY 06
Weekly borrowing base certificates YE 02.02.06
Weekly borrowing base certificates 02.03.06 thru 02.01.07
Weekly borrowing base certificates 02.02.07 thru 11.07
2007 Final with Audit and Birmingham Change
Pike Monthly Store P&L Summary
Retail Customer Counts and Sales
Wholesale Locations - Sales by Category and Location - 1-15-2008
Wholesale Customer Sales Analysis 1-15-2008
TTM P&L - Period 11
Capital Expenditures Detail
Six month cash flow budget
Cash collateral budget
Schedule of payments made within ninety (90) days
Cashiers Checks for November 2007
Comprehensive Insurance Documentation
Confirmation of Insurance
Pike Nursery Holding LLC - Confidential Information Memorandum
Memorandum Revenue Reconciliation
Pike Forecast Model
November 2007 Monthly Operating Report
December 2007 Monthly Operating Report
Statement of Financial Affairs and accompanying Schedules

Loan Agreements:

PNC Revolving Credit and Security Agreement
Bank of America Construction Loan Agreement
Correspondence and redline versions of loan agreements with PNC
DIP financing order relating to DIP loan from PNC

Real Estate:

Acworth Appraisal
Acworth appraisal (updated)
Acworth Closing Binder
Acworth Environmental
Acworth Site Plans
Acworth Title and Covenants Agreement
Acworth Licenses and Permits
Acworth Miscellaneous documents
Birmingham Appraisal
Birmingham appraisal (updated)
Birmingham Closing Binder
Birmingham Site Plans
Birmingham Title Insurance
Snellville Appraisal
Snellville appraisal (updated)
Charlotte Appraisal
Charlotte Closing and Escrow Statements
Charlotte ALTA & Environmental documents
Charlotte Site Plans
Charlotte Title Insurance
Charlotte Sale and Purchase documents (including amendments and assignments)
Summary of Pike Appraisals
Environmental Reports
Real Estate Summary
Summary Store Information
Lease - W Crossville- Store 40
Lease - Tucker- Store 4
Lease - Buford- Store 44
Lease - DLH Holdings Letter concerning Buford- Store 44
Lease - Alpharetta- Store 28
Lease - Alpharetta- Store 28 William Pike Lease
Lease - Alpharetta- Store 28 Lease Amendment
Lease - Lavista- Store 38
Lease - Lawrenceville- Stores 6,10,41
Lease - Cumming- Store 39
Lease - Conyers- Store 25
Lease - Lindbergh- Store 51

Lease - Lindbergh- Store 51-LOC
Lease - Peachtree City- Store 21
Lease - McFarland- Store 46
Lease - Riverside- Store 36
Lease - Roswell Road- Store 16
Lease - Spirit Leases- Stores 35, 37, 45, 18, 19, 24
Lease - Statebridge- Store 35
Lease - Stockbridge- Stores 29 and 49
Lease - Support Center- Stores 901-999
Lease - Suwanee- Store 33
Lease - Towne Lake- Store14
Town Lake Lease - Exhibit B
Pike Fixed Assets - ran 1-03-08 (detailed)

Inventory:

Pike Inventory Valuation - October 2007
Inventory Valuation Report 11-28-07
Borrowing Base Calculations 2-1-07
Borrowing Base Inventory Detail 11-1-07
Detailed Inventory 2005
Detailed Inventory 2006
Detailed Inventory 04-26-07
Detailed Inventory 05-25-07
Detailed Inventory 06-28-07
Detailed Inventory 07-27-07
Detailed Inventory 08-28-07
Detailed Inventory 09-28-07
Detailed Inventory 10-29-07
Detailed Inventory 11-29-07
Detailed Inventory 12-29-07
Detailed Inventory 1-03-08
YR07 vs YE06 Inventory Retail
YR07 vs YE06 Inventory Total Company
Current inventory down to class level
Retail inventory by store
Wholesale inventory by store
Borrowing Base Calculations 1-3-08

Vehicles:

Vehicle Titles

Insurance:

Pike Summary of Insurance
Premium Assignment Insurance Agreement
Comprehensive Insurance Documentation
General Incident Claims
D&O Policy

Litigation:

Statement of pending litigation
Statement of OSHA - Environmental Compliance Issues

Management, Personnel and Benefits:

Organization Chart as of 11-2007
List of Employees as of 12-7-07
Pike Employee Handbook
Pike Benefits Overview
Pike Nurseries 401K Plan
Form 5500 - 2003
Form 5500 - 2004
Form 5500- 2005
Form 5500 - 2006
PPO Jan 2005
POS Jan 2005
HMO Jan 2005
HMO Summary
POS Summary
PPO Summary 1- 04
Dental w Ortho Jan 2005
Dental Benefits Plan - Jan 2005
BCBSGA Dental Claims
Long-Term Disability Policy
Long-Term Disability Amendment
VLIF - Class 1
VLIF - Class2
VLIF - Class3
Life - Class1
Life - Class2
Group Life
Pike Exp_Enrollment 2005_2007
Pike Corporate Divisional Payroll
Scott Schnell - Resume
Roy Jenkins - Resume
Erica Breazeale Bio

Larry Brandon Bio
Melinda Williams Bio
Wayne Juers Bio
Alan Holcombe Bio
Jeff Hunter Bio
Larry Boese Bio
Larry Brandon Bio
Vann Riley Bio
Pike Nursery Holding LLC - Forecast and Transaction Process Conference Call
William L. Pike Consulting Agreement
Scott Schnell Employment Agreement
Schnell Amended Employment Agreement

Intellectual Property:

Domain Names
Copyrights
Trademarks
IP Summary

Contracts and Leases:

Accelerando Service Agreement
ADS Security Systems Service Contract
AJC Advertising Agreement
Allied Waste Sanitation Contract
Bank of America Merchant Services Agreement
Brinks Security Service Contract
California First Leasing Corporation
Clear Objective Service Agreement
DeLage Laden Equipment Lease
Epartners Maintenance Contract
Hillandale Mortgage
Jerry Pate Irrigation Lease
Jones Hall and Ground Lease
Verizon Service Agreement
Pike Clear Objective Agreements
Tomax Services Agreement
Technisource Outsourcing Contract
Toyota Lease Agreement
WSB Advertising Contract
Regions Operating Leases
Other Operating Leases
Border Concepts Supply Agreement
Co-Op Agreement with Akro Mills
Co-Op Agreement with Bahco

Co-Op Agreement with Bayer Advanced
Co-Op Agreement with Beldard
Co-Op Agreement with Belgard
Co-Op Agreement with Caffco
Co-Op Agreement with Dramm
Co-Op Agreement with Droll Yankee
Co-Op Agreement with Espoma
Co-Op Agreement with Garden Tech
Co-Op Agreement with Gardman USA
Co-Op Agreement with Greenlight
Co-Op Agreement with Hiatt
Co-Op Agreement with Hookery
Co-Op Agreement with Hunter
Co-Op Agreement with Master Gardner
Co-Op Agreement with Meadowcraft
Co-Op Agreement with Milorganite
Co-Op Agreement with Monrovia
Co-Op Agreement with Pennington
Co-Op Agreement with PhilChem
Co-Op Agreement with Principle Plastics
Co-Op Agreement with Sater
Co-Op Agreement with Scotts
Co-Op Agreement with Soil Moist
Co-Op Agreement with Woodlink
Operating lease and Real Property schedule

Permits and Licenses:

Plant and Animal Licenses
Summary of Business License Status
Lavista Business License
Business Licenses

Vendors:

Top 30 Vendors
2005-2006-2007 Comprehensive Vendor Listing

Transactional Documents:

Form Asset Purchase Agreement
Schedules to Form Asset Purchase Agreement

Industry Materials:

AJC Article
2006 National Gardening Survey
Sales Index by Regions
Data for South
Garden Survey data
Lawn and Garden Market Research
Palmer Z Index - Map April 07
Palmer Z Index - Map March 07
Palmer Z Index - Map May 07
Southeast Palmer Z Index 1998-2007
Southeast Precipitation 1998-2007
IBIS - Nursery and Floriculture Production
IBIS - Nursery and Garden Centers
White Paper on Outdoor Living
Pike Nurseries Brand Audit Executive Summary Presentation
Pike Nurseries Customer Segmentation Research Report

To Be Produced February 1, 2008:

2004 Asset Purchase Agreement
Purchase Accounting Allocation
Pike Family Stock Purchase Agreement
Pike Nursery Holding LLC Operating Agreement
Certificate of Organization
Roark Management Agreement
Termination of Roark Management Agreement
Schedule of Roark management fees
2005 Federal Income Tax Return
Schedule of Promissory Note Payments
SmokeRise Promissory Note
TruServe summary
Tucker property sale documents
Non-solicitation agreement- Ary
Non-solicitation agreement- Carroll
Non-solicitation agreement- King
Non-solicitation agreement- Rogers
Non-solicitation agreement- Topper
E-mail re: Echelon interest

CERTIFICATE OF SERVICE

This is to certify that on this date I served a true and correct copy of the within and foregoing **Limited Objection to Motion of Official Committee of Unsecured Creditors for an Order Directing the Debtor to Produce Documents Pursuant to Fed.R.Bankr.P. 2004** by causing a true and complete copy of the same to be deposited in the United States Mail, sufficient First Class postage prepaid upon the creditors and other parties set forth on the attached Service List.

This 1st day of February, 2008.

Respectfully submitted,

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/s/ Ashley R. Ray

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