

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FOOD52, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 25-12277 (LSS)

**Hearing Date:**

January 22, 2026 at 10:30 a.m. (ET)

**Objection Deadline:**

January 15, 2026 at 4:00 p.m. (ET)

Ref. Docket Nos. 4, 5, 6, 7, 8, 9, 10, 11, 33, 34,  
35, 36, 37, 38, 41, and 42

**OMNIBUS NOTICE OF FIRST DAY MOTIONS AND FINAL HEARING THEREON**

**PLEASE TAKE NOTICE** that, on December 29, 2025, the above-captioned debtor and debtor in possession (the “**Debtor**”), filed, among others, the following first day motions (collectively, the “**First Day Motions**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”):

1. Debtor’s Motion for Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment, and (IV) Setting a Final Hearing Related Thereto [Docket No. 4]
2. Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay Certain Prepetition Taxes and Fees and Related Obligations, (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 5]
3. Debtor’s Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Obligations Incurred in the Ordinary Course of Business in Connection with the Debtor’s Insurance Programs, Including Payment of Policy Premiums and Broker Fees; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Docket No. 6]

<sup>1</sup> The Debtor in this chapter 11 case is Food52, Inc. and the last four digits of the Debtor’s federal tax identification number are 2604. For the purpose of this chapter 11 case, the Debtor’s service address is 1 Dock 72 Way, 13<sup>th</sup> Floor, Brooklyn, New York 11205.



4. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay and Honor Certain (A) Prepetition Wages, Benefits, and Other Compensation Obligations; (B) Prepetition Employee Business Expenses; and (C) Workers' Compensation Obligations; (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations; and (III) Granting Related Relief [Docket No. 7]
5. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay Prepetition Claims of Certain (A) Critical Vendors, (B) 503(b)(9) Claimants, and (C) Lien Claimants; (II) Confirming Administrative Expense Priority of Outstanding Orders; (III) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations; and (IV) Granting Related Relief [Docket No. 8]
6. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing and Approving Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Business Forms, and (III) Granting Certain Related Relief [Docket No. 9]
7. Debtor's Motion for Entry of Interim and Final Orders (I) (A) Authorizing Continuation of, and Payment of Prepetition Amounts Incurred in Connection with, Customer Programs and (B) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related Thereto, and (II) Granting Related Relief [Docket No. 10]
8. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing; (II) Granting Liens and Providing Superpriority Administrative Expense Status; (III) Authorizing Use of Cash Collateral; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [Docket No. 11]

**PLEASE TAKE FURTHER NOTICE** that a hearing on the First Day Motions was held on December 31, 2025 (the "**First Day Hearing**"), after which the Court entered certain orders granting the relief requested in the First Day Motions on an interim basis [Docket Nos. 33, 34, 35, 36, 37, 38, 41, and 42] (collectively, the "**Interim Orders**"). Concurrently herewith, you are being served with the Interim Orders.

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions and the related Interim Orders are available, free of charge, from the website of the Court-appointed claims agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, online at <https://www.veritaglobal.net/Food52>.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to approval of the First Day Motions on a final basis must be filed on or before **January 15, 2026 at 4:00 p.m. (ET)** (the "**Objection Deadline**") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, copies of any responses or objections must be served so as to be received on or before the Objection Deadline upon the following parties: (a) proposed counsel to the Debtor, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Michael R. Nestor, Esq. (mnestor@ycst.com), Kara Hammond Coyle, Esq. (kcoyle@ycst.com), Elizabeth S. Justison, Esq. (ejustison@ycst.com), S. Alexander Faris, Esq.

(afaris@ycst.com), and Andrew M. Lee, Esq. (alee@ycst.com); (b) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware, 19801, Attn: Benjamin A. Hackman, Esq. (Benjamin.A.Hackman@usdoj.gov); (c) counsel to the Stalking Horse Bidder and the DIP Lender, Moore & Van Allen PLLC, 100 N. Tryon Street, Suite 4700, Charlotte, North Carolina 28202, Attn: James R. Langdon, Esq. (jimlangdon@mvlaw.com) and C. Cowden W. Rayburn, Esq. (cowdenrayburn@mvlaw.com), and Chipman Brown Cicero & Cole, LLP, 1313 N. Market Street, Wilmington, Delaware 19801, Attn: William E. Chipman Jr., Esq. (chipman@chipmanbrown.com); and (d) proposed counsel to any committee appointed in this chapter 11 case.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER APPROVAL OF THE FIRST DAY MOTIONS ON A FINAL BASIS IS SCHEDULED FOR JANUARY 22, 2026 AT 10:30 AM. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY MOTIONS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.**

*[Remainder of Page Intentionally Left Blank]*

Dated: December 31, 2025  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT &  
TAYLOR, LLP**

/s/ Elizabeth S. Justison

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*Proposed Counsel for the Debtor  
and Debtor in Possession*