UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

GROEB FARMS, INC.,

Debtor.
_____/

No. 13-58200-WSD
Chapter 11
Judge Shapero

OBJECTION TO DISCLOSURE STATEMENT

Adee Honey Farms, Bill Rhodes Honey Company, LLC and Hackenberg Apiaries, the Proposed Class Representatives (the "PCR"), through counsel, objects to Debtor's Disclosure Statement and states:

1. Debtor's Disclosure Statement is ambiguous as to the parties released under Debtor's Plan of Reorganization (the "Plan") and the scope of those releases and therefore needs to be revised.

2. The PCR is involved in prepetition class action litigation as plaintiff against Debtor and other defendants. A prepetition agreement was reached between the PCR and Debtor regarding, among other things, restructuring of the Debtor. That agreement has not been fully documented, and one of the components of the agreement is the parties and scope of releases to be given with respect to the litigation.

3. Debtor's Disclosure Statement and Plan are vague and/or ambiguous with respect to the parties and scope of releases given under the Plan. Therefore, the Disclosure Statement and Plan must be clarified so the PCR can ascertain whether it is consistent with the prepetition agreement.

4. The PCR reserves the right to address any other deficiencies of the Disclosure Statement at the hearing.

Wherefore, the PCR requests that this Court deny approval of the Disclosure Statement until the deficiency described above is rectified.

/S/Adam J. Levitt
Proposed Class Representatives
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- and -

/S/Ralph R. McKee
Local Counsel for Proposed Class Representatives
Allard & Fish, P.C.
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P39484

Dated: November 6, 2013

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CERTIFICATION OF SERVICE

I, Regina Drouillard, hereby certify that on November 6, 2013, I electronically filed the following:

Objection to Disclosure Statement

with the Clerk of the Court using the ECF and I hereby certify that the Court's ECF system has served all registered users.

ALLARD & FISH, P.C.

/S/Regina Drouillard
535 Griswold
2600 Buhl Building
Detroit MI 48226
(313) 961-6141

Dated: November 6, 2013
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