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

| | | |
|---|---|---|
| In re: | ) | |
| | ) | Chapter 11 |
| GROEB FARMS, INC., | ) | |
| | ) | Case No. 13-58200-wsd |
| Debtor. | ) | |
| | ) | Honorable Walter Shapero |
| | ) | |

**THE GENERAL UNSECURED CLAIMS LITIGATION TRUSTEE'S OBJECTION TO CLOSING OF CASE**

The General Unsecured Claims Litigation Trustee (the "GUC Trustee") of Groeb Farms, Inc., by and through his counsel, files this objection (the "Objection") to the Notice of Confirmation and Opportunity to Object to the Closing of the Case [Docket No. 376] (the "Notice of Confirmation"). In support hereof, the GUC Trustee states as follows:

**Relief Requested**

1. The Notice of Confirmation was entered on December 20, 2013. Pursuant to the Notice of Confirmation, the Debtors proposed that the bankruptcy case be closed within 60 days of the Notice of Confirmation, or by February 18, 2014 unless an objection to closure of the case was filed.

2. On January 7, 2014, the Official Committee of Unsecured Creditors appointed in this case filed its Objection to Closing of the Case [Docket No. 387].

3. The Court scheduled a hearing on case closure for January 30, 2014 and then adjourned the matter to July 24, 2014 as a control date. [January 31, 2014 Minute Entry].

4. On April 11, 2014, this Court granted the relief requested in the Motion of the General Unsecured Claims Litigation Trust for Entry of an Order Extending the Deadline to Object to the Allowance of Claims (the "Extension Motion") and extended the deadline within which the GUC Trustee could object to claims through and including December 31, 2014 (the "Claim Objection Deadline").

5. The GUC Trustee requested the relief in the Extension Motion to provide the GUC Trustee with time to review claims, negotiate possible resolutions and file timely objections if appropriate.

6. The GUC Trustee is also in the process of evaluating possible avoidance actions and requires sufficient time to conduct this review.

7. In addition, the GUC Trustee has been in active discussions with claimants and litigants in this case to resolve claims and litigation. The GUC Trustee requires time to complete these negotiations.

8. Accordingly, the GUC Trustee requests that the bankruptcy case remain open and the Court further adjourn this matter to a control date which is 30 days after the Claim Objection Deadline or January 30, 2015 to allow adequate time for the GUC Trustee (a) to review and object to claims if necessary and (b) to allow time for the GUC Trustee to evaluate possible avoidance actions and complete on-going negotiations with a number of parties.

WHEREFORE, the Committee respectfully requests that this Court allow the case to remain open and adjourn this matter to January 30, 2015 as a control date, without prejudice to the GUC Trustee's right to request a further extension if needed.

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