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

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

CERTIFICATE OF NO RESPONSE
TO THE MOTION OF THE GENERAL UNSECURED CLAIMS LITIGATION TRUSTEE FOR ENTRY OF AN ORDER FURTHER EXTENDING THE DEADLINE TO OBJECT TO THE ALLOWANCE OF CLAIMS

The General Unsecured Claims Litigation Trustee (the "GUC Trustee"), hereby submits, pursuant to Local Rule of Bankruptcy Procedure 9014-1 and ECF Procedure 7(a)(3), as follows:

1. On December 16, 2014, the GUC Trustee filed the *Motion Of The General Unsecured Claims Litigation Trustee For Entry Of An Order Further Extending The Deadline To Object To The Allowance Of Claims* (the "Motion") (Docket No. 491).

2. On December 17, 2014, the GUC Trustee filed an *Ex Parte Motion To Expedite Consideration And Deadline For Responses To The Motion Of The General Unsecured Claims Litigation Trustee For Entry Of An Order Further Extending The Deadline To The Allowance Of Claims* ("Ex Parte Motion") (Docket No. 495), which was granted on December 18, 2014 ("Order re Ex Parte Motion") (Docket No. 496).

3. On December 18, 2014, the Motion and the Order re Ex Parte Motion were served. *See* Affidavit of Service (Docket No. 497).

4. No response to the Motion has been filed or received.

WHEREFORE, the GUC Trustee respectfully requests that this Court enter the order granting the Motion attached hereto as Exhibit A.

Dated: December 29, 2014

DYKEMA GOSSETT PLLC

/s/ Sheryl Toby

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Counsel to the General Unsecured Claims Litigation Trustee

EXHIBIT A

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

ORDER FURTHER EXTENDING THE DEADLINE TO OBJECT TO THE ALLOWANCE OF CLAIMS

Upon the motion (the "Motion")[1] of the General Unsecured Claims Litigation Trustee in the above referenced case, (the "GUC Trustee"), for the entry of an order (this "Order") further extending the deadline to object to the allowance of Claims against the Reorganized Debtors, all as more fully set forth in the Motion; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Reorganized Debtor's estate, its creditors, and other parties in interest; and the GUC Trustee having provided appropriate notice under the circumstances of the Motion and the opportunity for a hearing on the Motion, and that no other or further notice is required; and the Court having reviewed the Motion; and the Court having determined that the

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, Accordingly, it is hereby:

ORDERED that, the Motion is granted as set forth herein.

ORDERED that, the Claims Objection Deadline is extended through and including June 30, 2015 without prejudice to the GUC Trustee's rights to request a further continuance.

ORDERED that, the relief granted herein is without prejudice to the GUC Trustee's right to seek further extensions of the Claims Objection Deadline.

ORDERED that, the GUC Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

ORDERED that, notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014, or otherwise, terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

ORDERED that, to the extent that this Order is inconsistent with any prior order or pleading with respect to the Motion in this case, the terms of this Order shall govern.

ORDERED that, the Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

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

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

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2014, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys on that system.

By: */s/ Sheryl L. Toby*

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