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
	)	

SECOND STIPULATION RESOLVING 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 and the Office of the United States Trustee hereby agree as follows:

Background

1. The Notice of Confirmation was entered on December 20, 2013. Pursuant to the Notice of Confirmation, the bankruptcy case would 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] (the "Objection").

3. On July 22, 2014, the Court entered the *Order Approving Stipulation Resolving the General Unsecured Claims Litigation Trustee's Objection to Closing of Cases* [Docket No. 479] (the "First Stipulation"). By the First Stipulation, this matter was adjourned to a control date of January 30, 2015.

4. On December 29, 2014, the Court entered the *Order Further Extending the Deadline to Object to the Allowance of Claims* [Docket No. 499], which extended the Claim Objection Deadline to June 30, 2015.

5. The GUC Trustee requests that the bankruptcy case remain open and the Court further adjourn this matter to a control date which is 31 days after the Claim Objection Deadline or July 31, 2015 to allow adequate time for the GUC Trustee (a) to review and object to claims if necessary and (b) to allow sufficient time for the GUC Trustee to evaluate possible avoidance actions and complete on-going negotiations with a number of parties.

Now the GUC Trustee and the United States Trustee have conferred agree to settle the Objection as follows:

A. The case shall remain open and adjourn this matter to July 31, 2015 as a control date, without prejudice to the GUC Trustee's right to request a further extension if needed.

Dated: January 28, 2015

DYKEMA GOSSETT PLLC

/s/ Sheryl L. Toby

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Dated: January 28, 2015

/s/ Leslie K. Berg

United States Trustee
Leslie K. Berg (UST)
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ORDER APPROVING SECOND
STIPULATION RESOLVING THE GENERAL UNSECURED CLAIMS
LITIGATION TRUSTEE'S OBJECTION TO CLOSING OF CASE

Upon consideration of the *Second Stipulation Resolving the General Unsecured Claims Litigation Trustee's Objection to Closing of Case* attached hereto as Exhibit 1 (the "Stipulation") and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Stipulation and all of its terms are approved;

2. The above captioned case shall remain open and this matter is adjourned to July 31, 2015 as a control date, without prejudice to the GUC Trustee's right to request a further extension if needed; and

3. This Court shall retain jurisdiction to hear and determine all matters arising from or in connection with the implementation, enforcement and interpretation of this Order.

Dated: January ___, 2015

The Honorable Walter Shapero,
United States Bankruptcy Court Judge