

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

In re:)	
)	Chapter 11
T&S FOOD SERVICES II, LLC, ¹)	Case No. 25-11178 (TMH)
Debtor.)	Obj. Deadline: Sept. 24, 2025 at 4:00 p.m. (ET)
)	Hearing Date: Oct. 1, 2025 at 2:00 p.m. (ET)

**MOTION OF DEBTOR FOR ENTRY OF AN ORDER (I) ESTABLISHING CERTAIN
BAR DATES FOR FILING PROOFS OF CLAIM AGAINST THE DEBTOR, AND (II)
GRANTING RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

T&S Food Services II, LLC, the debtor and debtor in possession in the above-captioned case (the “**Debtor**”), hereby files this motion (this “**Motion**”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), pursuant to sections 501, 502, and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”), rules 2002, 3002, and 3003 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rule 2002-1(e)(i)(b) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), establishing procedures (the “**Bar Date Procedures**”) for establishment of the Bar Dates (as defined herein). In support of this Motion, the Debtor respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012.

¹ The last four digits of the Debtor’s federal tax identification number are 4244 and the Debtor’s mailing address is 201 B West Butler Road, Suite 1101, Mauldin, South Carolina 29662.

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). In addition, the Debtor confirms its consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter a final order or judgment in connection herewith consistent with Article III of the United States Constitution.

3. Venue of this chapter 11 case and related proceedings is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. On June 19, 2025 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “**Chapter 11 Case**”) in the United States Bankruptcy Court for the District of Delaware (the “**Court**”). The Debtor is operating its business and managing its property as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No committee or examiner has been appointed in this Chapter 11 Case.

5. The Debtor owns and operates eight (8) Denny’s restaurants under franchise agreements with a Denny’s affiliate, DFO, LLC. The Debtor’s presence spans multiple states, including Louisiana, Illinois and Missouri. A detailed description of the Debtor and its business, organizational structure, capital structure, and the circumstances that led to the commencement of this Chapter 11 Case is set forth in the *Omnibus Declaration of Rolando Allen in Support of First Day Motions and Chapter 11 Case* [D.I. 3].

6. On June 24, 2025, the Court entered the *Order Pursuant to 28 U.S.C. § 156(c), Bankruptcy Code Section 105(a) and Local Rule 2002-1(e), Authorizing Appointment of Reliable Companies d/b/a Reliable as Claims and Noticing Agent, Effective as of the Petition Date* [D.I.

28], which authorized Reliable Companies d/b/a Reliable (“**Reliable**” or “**Claims and Noticing Agent**”) to serve as the Debtor’s claims and noticing agent.

7. The Debtor seeks to establish the Bar Dates (as defined herein) to ascertain the current universe of claims against its estate and facilitate a chapter 11 sale of substantially all of its assets or another disposition of the Chapter 11 Case.

PROPOSED BAR DATE PROCEDURES

8. By this Motion, the Debtor requests that the Court enter the Proposed Order:
- a. establishing 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from service of the notice of the bar date (the “**Bar Date Notice**”) as the deadline (the “**General Bar Date**”) for each person or entity, other than a governmental unit, to file a proof of claim with respect to any prepetition claim against the Debtor, including, without limitation, any secured claim, unsecured claim, priority claim, claim asserted under section 503(b)(9)² of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days before the Petition Date, unless otherwise provided in this Motion;
 - b. establishing December 16, 2025, as the deadline (the “**Government Bar Date**”) by which a governmental unit must file a proof of claim with respect to a prepetition claim against the Debtor;
 - c. establishing the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the later of (A) the date of the entry of an order approving rejection of an executory contract or unexpired lease of the Debtor, and (B) the effective date of rejection of an executory contract or unexpired lease of the Debtor as the deadline (the “**Rejection Bar Date**”) by which an entity asserting a claim for damages against the Debtor arising from such rejection must file a proof of claim on account of such damages;
 - d. establishing the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtor’s schedules of assets and liabilities (the “**Schedules**”) as the deadline (the “**Amended Schedule Bar Date**”) for an entity whose claim is

² Section 503(b)(9) of the Bankruptcy Code states that “[a]fter notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including . . . the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.”

affected by such amendment to file, amend, or supplement a proof of claim with respect to such claim;

- e. approving the forms of notice to be used to inform potential creditors of the foregoing bar dates (collectively, the “**Bar Dates**”);
- f. approving mailing procedures with respect to notice of the Bar Dates; and
- g. granting related relief.

Proposed Bar Dates

9. Bankruptcy Rule 3003(c)(3) states that the Court shall fix the time within which proofs of claim may be filed. Bankruptcy Rule 3003(c)(2) requires a creditor whose claim is not scheduled or is scheduled as disputed, contingent, or unliquidated to file a proof of claim within the time fixed by the Court under Bankruptcy Rule 3003(c)(3). Additionally, Bankruptcy Rules 3003(c)(3) and 3002(c)(4) provide that the Court may fix a time for filing a claim arising from rejection of an executory contract or unexpired lease. Furthermore, Local Rule 2002-1(e) permits a chapter 11 debtor to request a bar date for filing proofs of claim.

10. Bankruptcy Rule 2002(a) provides that creditors are entitled to at least twenty-one (21) days’ notice of the time fixed for filing proofs of claim under Bankruptcy Rule 3003.

A. The General Bar Date

11. The Debtor requests that the Court establish 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from service of the Bar Date Notice as the General Bar Date. The General Bar Date will be the deadline by which each person or entity, other than a governmental unit, must file a proof of claim with respect to any prepetition claim against the Debtor, including, without limitation, any secured claim, unsecured claim, priority claim, claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days of the Petition Date, except as otherwise provided in this Motion. As noted above, the

General Bar Date complies with applicable Bankruptcy Rules because it provides the amount of notice required by Bankruptcy Rule 2002(a).

B. The Government Bar Date

12. Section 502(b)(9) of the Bankruptcy Code provides, in relevant part, that “a claim of a governmental unit shall be timely filed if it is filed before one hundred eighty (180) days after the date of the order for relief or such later time as the Federal Rules of Bankruptcy Procedure may provide.”

13. The Debtor requests that the Court establish December 16, 2025, as the Government Bar Date. The Government Bar Date will be the deadline by which any governmental unit must file a proof of claim with respect to any prepetition claim against the Debtor, including, without limitation, any secured claim, unsecured claim, priority claim, or any claim for unpaid taxes. As December 16, 2025, is the first business day at least one hundred eighty (180) days after the Petition Date, the proposed Government Bar Date complies with section 502(b)(9) of the Bankruptcy Code.

C. The Rejection Bar Date

14. The Debtor requests that the Court establish the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the later of (A) the date of the entry of an order approving rejection of an executory contract or unexpired lease of the Debtor, and (B) the effective date of rejection of an executory contract or unexpired lease of the Debtor as the Rejection Bar Date. The Rejection Bar Date will apply to any entity asserting a claim against the Debtor arising from rejection of an executory contract or unexpired lease. As noted above, the Rejection Bar Date complies with

Bankruptcy Rules 2002, 3002(c)(4), and 3003(c)(3) because it provides thirty (30) days' notice to potential claimants, which is more than is required by the Bankruptcy Rules.

D. Amended Schedule Bar Date

15. The Debtor requests that the Court establish the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtor's Schedules as the Amended Schedule Bar Date. The Amended Schedule Bar Date will apply to any entity whose claim is affected by an amendment to the Schedules. In particular, an entity whose claim is added or removed from the Schedules, changed with respect to amount or priority, or designated as contingent, unliquidated, or disputed when it previously was not so designated, shall be given notice of the Amended Schedule Bar Date and shall be required (to the extent necessary to dispute any such amendment) to file, amend, or supplement a proof of claim by such date. As noted above, the Amended Schedule Bar Date complies with Bankruptcy Rules 2002 and 3003(c)(3) because it provides thirty (30) days' notice to potential claimants, which is more than is required by the Bankruptcy Rules.

The Proposed Claim Filing Requirements and Procedures

A. Who Must File a Proof of Claim

16. Except as otherwise provided herein, the Debtor proposes that the following persons or entities asserting claims against the Debtor arising, or deemed to arise, before the Petition Date be required to file proofs of claim by the applicable Bar Date (regardless of whether such claim is secured or unsecured, priority or nonpriority, or otherwise) if such persons or entities wish to be treated as creditors with respect to such claim for the purposes of voting and distribution in this case:

- a. any person or entity whose claim is not listed on the Debtor's Schedules;
- b. any person or entity whose claim is listed on the Debtor's Schedules as contingent, unliquidated, or disputed;
- c. any person or entity whose claim is improperly classified on the Debtor's Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount than identified in the applicable Schedules;
- d. any person or entity who believes that its claim against the Debtor is or may be entitled to priority under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days before the Petition Date;
- e. any person or entity who asserts a claim arising from the rejection of an executory contract or unexpired lease of the Debtor and has not previously filed any such claim;
- f. any person or entity who asserts a claim against the Debtor arising from or relating to the purchase or sale of any security of the Debtor, including, without limitation, any equity security; and
- g. any person or entity who asserts a claim arising from or relating to pending or threatened litigation against the Debtor, including any claim arising for alleged wage and hour violations or unfair business practices.

B. Who is Not Required to File a Proof of Claim

17. The Debtor proposes that the following persons or entities holding prepetition claims against the Debtor shall not be required to file proofs of claim:

- a. any person or entity whose claim is listed on the Schedules, if (i) the claim is not listed as contingent, unliquidated, or disputed, and (ii) the person or entity does not disagree with the amount, nature or priority of the claim as identified on the Schedules;
- b. any person or entity who has already filed with Reliable or with the Clerk of Court a signed proof of claim against the Debtor utilizing Official Form B410 or a claim form that substantially conforms to such official form, including by providing all of the information required by such form and the procedures set forth herein;
- c. any person or entity whose claim is allowable under sections 503(b) and section 507(a)(2) of the Bankruptcy Code as an administrative expense (other than a claim arising under section 503(b)(9) of the Bankruptcy Code);

- d. any person or entity whose claim has been allowed by order of the Court entered on or before the applicable Bar Date;
- e. any person or entity whose claim has been paid in full in accordance with an order of the Court entered on or before the applicable Bar Date;
- f. any person or entity whose claim is based solely on owning an equity security in the Debtor;
- g. any employee of the Debtor who was employed at any time on or after the Petition Date and whose prepetition salary, wages, benefits or other remuneration have been paid pursuant to Court order; provided, however, that all other claims of employees arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, retaliation, wage and hour violations, or unfair business practices, must be filed by the applicable Bar Date;
- h. any director, officer, or employee of the Debtor who served in such capacity at any time after the Petition Date for claims based on indemnification, contribution, or reimbursement; and
- i. any contract or lease counterparty whose contract or lease has been assumed or assumed and assigned by the Debtor.

C. Requirements and Procedures for Filing a Proof of Claim

18. The Debtor has prepared, and requests that the Court approve, the customized proof of claim form (the “**Claim Form**”) attached as Exhibit 1 to the Proposed Order. The Claim Form is derived from and substantially conforms to Official Form B410 but is customized for this Chapter 11 Case.

19. The Debtor proposes that each proof of claim be required to meet the following minimum requirements:

- a. be submitted on the Claim Form or Official Form B410, or substantially conform to such official form; and
- b. be written in the English language, denominated in U.S. dollars, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant’s attorney or authorized agent.

20. The Debtor proposes the following requirements for filing a proof of claim:

- a. Electronic proofs of claim. A proof of claim may be filed electronically at <https://www.bankruptcy-claims.com/tsfood/CaseHome.aspx> using the interface available after clicking the link titled “Submit a Claim.” A claim must be submitted **so as to be actually received** on or before the applicable Bar Date.
- b. Hardcopy proofs of claim. An original, signed copy of the proof of claim must be sent **so as to be actually received, post mark date is insufficient,** on or before the applicable Bar Date as follows:

By U.S. Mail or other hand delivery system:

T&S Food Services II, LLC Bankruptcy Claims Processing Center
c/o Reliable Companies
1007 North Orange Street, Suite 110
Wilmington, DE 19801

- c. Other methods not accepted. Proofs of claim sent by means other than as described above, including by means of email or fax, will not be accepted.

Consequences of Failure to Timely File a Claim

21. Bankruptcy Rule 3003(c)(2) provides that “any creditor who fails to [timely file a proof of claim] shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution.” Consistent with this rule, the Debtor requests that the Court order that any claimant that fails to file a proof of claim in accordance with the foregoing requirements and procedures before the applicable Bar Date shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution in this Chapter 11 Case.

Notice of the Bar Dates

A. Actual Notice of the Bar Dates to Known Potential Creditors

22. Pursuant to Bankruptcy Rule 2002(a)(7), (f), and (p), the Debtor proposes to provide actual notice of the Bar Dates, substantially in the form attached as Exhibit 2 to the Proposed Order, and the Claim Form (collectively with the Bar Date Notice, the “**Bar Date Notice Package**”) to the following potential creditors and other parties in interest, wherever located:

- a. the Office of the U.S. Trustee;
- b. all known creditors and other known holders of potential claims against the Debtor or its estate;
- c. all parties who have filed claims in this Chapter 11 Case, including administrative expense claims, as of the date of entry of the Proposed Order;
- d. all counterparties to executory contracts and unexpired leases listed on the Schedules at the addresses stated therein or as updated by a counterparty pursuant to the terms of the contract or lease;
- e. all parties who have filed a request for notice in this Chapter 11 Case pursuant to Bankruptcy Rule 2002 as of the date of entry of the Proposed Order;
- f. all parties who have otherwise filed a document in this Chapter 11 Case and are identified on the Court's electronic docket as of the date of entry of the Proposed Order;
- g. all employees of the Debtor as of the Petition Date;
- h. all taxing authorities for jurisdictions in which the Debtor does business or did business within three (3) years prior to the Petition Date;
- i. all government agencies that regulate the Debtor's business;
- j. the office of the attorney general for each state in which the Debtor is incorporated or maintained or conducted business within three (3) years prior to the Petition Date;
- k. all known lienholders;
- l. all parties to litigation pending or threatened against the Debtor as of the date of entry of the Proposed Order;
- m. all providers of utility services to the Debtor as of the Petition Date;
- n. the Debtor's current and past insurance providers under whose policies open claims remain pending;
- o. the Debtor's ordinary course professionals;
- p. the Debtor's banks; and
- q. all parties included on the creditor matrix filed in this Chapter 11 Case (collectively, the "**Bar Date Notice Parties**").

23. The proposed Bar Date Notice provides notice of: (i) the Bar Dates; (ii) who must file a proof of claim on account of a prepetition claim; (iii) the procedures for preparing and filing a proof of claim; (iv) the consequences of failing to timely file a proof of claim or request; and (v) where parties can find further information about the Debtor's Chapter 11 Case.

24. Consistent with the procedures described above, the applicable Bar Date specified in any Bar Date Notice will be at least twenty-one (21) days from the date the Bar Date Notice is mailed. Here the Debtor has allowed additional notice so that each potential claimant will receive thirty (30) days' notice by mail of the Bar Date that applies to their potential claim. For mailings subsequent to the initial mailing of the Bar Date Notice for the General Bar Date, the Debtor proposes that they be granted authority (but not direction) to amend the Bar Date Notice to remove stale or nonessential information. For example, if the General Bar Date has passed at the time the Debtor's mail notice of a Rejection Bar Date or Amended Schedule Bar Date, then the Debtor should be permitted (but not required) to remove information concerning the General Bar Date, as such date would no longer be relevant.

25. The Debtor requests that service of the Bar Date Notice in the manner described above be deemed to constitute good and sufficient notice of the Bar Dates in accordance with Bankruptcy Rule 2002(a)(7).

BASIS FOR RELIEF

26. As discussed above, Bankruptcy Rule 3003(c)(3) requires the bankruptcy court to fix the time within which proofs of claim may be filed in a chapter 11 case. Fed. R. Bankr. P. 3003(c)(3) ("The court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed."). Likewise, section 503(a) of the Bankruptcy Code contemplates that the bankruptcy court will fix a deadline for filing administrative expense claims because it

requires that such claims be “timely.” 11 U.S.C. § 503(a) (“An entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.”).

27. Moreover, establishing claims bar dates enables a debtor and parties in interest to ascertain and evaluate the debtor’s liabilities and, with that information, proceed to a chapter 11 plan or other disposition. *See Chemetron Corp. v. Jones*, 72 F.3d 341, 346 (3d Cir. 1995) (noting that establishing a bar date advances one of the key goals of a bankruptcy, “to secure within a limited period the prompt and effectual administration and settlement of the debtor’s estate”). Without a bar date, the debtor may not be able to formulate a disclosure statement or proceed with a plan because, among other reasons, it may not be able to determine the treatment of creditors without knowing with certainty the quantum of claims. Indeed, courts typically require that a disclosure statement discuss the amount and nature of claims against the debtor. Similarly, without knowing the quantum of administrative or priority claims against its estate, a debtor may not be able to demonstrate that a plan is feasible, as such claims typically need to be paid when the plan goes effective. For these reasons, establishing the Bar Dates in this case is essential to the Debtor’s efforts to pursue a chapter 11 plan or other disposition of this Chapter 11 Case.

28. Furthermore, the proposed Bar Dates and notice procedures set forth herein fully comply with the applicable notice requirements of the Bankruptcy Code and the Bankruptcy Rules. As described in greater detail above, the Bankruptcy Rules require twenty-one (21) days’ notice of a bar date, which the proposed Bar Date and notice procedures satisfy. Moreover, the proposed Government Bar Date provides the time stated in section 502(b)(9) of the Bankruptcy Code.

29. Additionally, the Debtor’s proposed noticing campaign is consistent with applicable law, which requires actual notice to “known” potential creditors. *See Chemetron*, 72

F.3d at 346. “[A] ‘known’ creditor is one whose identity is either known or ‘reasonably ascertainable by the debtor.’” *Id.* (quoting *Tulsa Prof. Collection Serv., Inc. v. Pope*, 485 U.S. 478, 490 (1988)). “A creditor’s identity is ‘reasonably ascertainable’ if that creditor can be identified through ‘reasonably diligent efforts.’” *Id.* (quoting *Mennonite Bd. of Missions v. Adams*, 462 U.S. 791, 798 n. 4 (1983)). “Reasonably diligent efforts” do not require impracticable or extended searches, and a debtor does not have a duty to search out every conceivable or possible creditor. *See id.* (citations omitted). Rather, “the requisite search instead focuses on the debtor’s own books and records.” *Id.*

30. The Debtor’s noticing campaign for known potential creditors meet these criteria. The Debtor’s proposed list of notice parties encompasses each of the categories of potential claimants that the Debtor believes may exist based on their books and records and current and historical operations, and thus is designed to provide notice of the Bar Dates to all potential creditors who are “reasonably ascertainable” based on the Debtor’s books and records.

31. For the foregoing reasons, the Debtor submits that the Bar Dates and related noticing and procedures are consistent with the Bankruptcy Code, Bankruptcy Rules, and applicable law, and should therefore be approved.

Proposed Redaction of Personally Identifiable Information

32. On July 23, 2025, the Court entered the *Final Order Authorizing the Debtor to Redact Certain Personal Identification Information* [D.I. 67] which authorized the Debtor, among other things, to redact from (a) the consolidated creditor matrix, (b) the list of equity holders, (c) the schedules of assets and liabilities, (d) the statements of financial affairs, and (e) all other filings, certain personally identifiable information, such as the home addresses of individuals, including the Debtor’s individual creditors and interest holders, including employees, former employees and

equity holders. The Debtor submits that authority to redact any such information on the claims register is necessary to ensure that the Debtor and Reliable may prevent the disclosure of confidential information and comply with applicable law.

NOTICE

33. Notice of this Motion will be provided to the following parties: (i) the Office of the United States Trustee for the District of Delaware (Attn: Jonathan Lipshie (jon.lipshie@usdoj.gov)); (ii) the Debtor's twenty (20) largest unsecured creditors; (iii) the United States Attorney for the District of Delaware; (iv) the United States Attorneys for the districts in which the Debtor conducts business; (v) the state attorney generals for all states in which the Debtor conducts business; (vi) the Internal Revenue Service; and (vii) any party that has requested notice pursuant to Bankruptcy Rule 2002. Due to the nature of the relief requested herein, the Debtor submits that no other or further notice need be provided.

WHEREFORE, the Debtor respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as the Court deems just and proper.

Dated: September 10, 2025

CLARK HILL PLC

/s/ Karen M. Grivner
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
T&S FOOD SERVICES II, LLC, ¹)	Case No. 25-11178 (TMH)
Debtor.)	Obj. Deadline: Sept. 24, 2025 at 4:00 p.m. (ET)
)	Hearing Date: Oct. 1, 2025 at 2:00 p.m. (ET)

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on September 10, 2025, the above-captioned debtor and debtor in possession T&S Food Services II, LLC (the “**Debtor**”) filed the *Motion of Debtor for Entry of an Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtor, and (II) Granting Related Relief, Including Notice and Filing Procedures* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **September 24, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”). At the same time, you must serve a copy of the objection upon the undersigned counsel to the Debtor so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objection may be considered at a hearing before the Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801 on **October 1, 2025 at 2:00 p.m. (prevailing Eastern Time)**.

¹ The last four digits of the Debtor’s federal tax identification number are 4244 and the Debtor’s mailing address is 201 B West Butler Road, Suite 1101, Mauldin, South Carolina 29662.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 10, 2025

CLARK HILL PLC

/s/ Karen M. Grivner

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Counsel for T&S Food Services II, LLC

EXHIBIT A

Proposed Order

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

In re:)	
)	Chapter 11
T&S FOOD SERVICES II, LLC, ¹)	Case No. 25-11178 (TMH)
)	
Debtor.)	Re: D.I. __
)	

**ORDER (I) ESTABLISHING CERTAIN BAR DATES FOR FILING PROOFS
OF CLAIM AGAINST THE DEBTOR, AND (II) GRANTING RELATED
RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

Upon the motion (the “**Motion**”)² of the Debtor, for entry of an order, pursuant to sections 501, 502, and 503 of the Bankruptcy Code, Bankruptcy Rules 2002, 3002, and 3003, and Local Rule 2002-1(e), (i) establishing certain bar dates for filing prepetition claims in the Chapter 11 Case, and (ii) granting related relief, including approving the form and manner of notice thereof; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157; and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of the Chapter 11 Case and related proceedings being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been given, such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Motion; and the Court having held a hearing, if necessary, to consider the relief requested in the

¹ The last four digits of the Debtor’s federal tax identification number are 4244 and the Debtor’s mailing address is 201 B West Butler Road, Suite 1101, Mauldin, South Carolina 29662.

² Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Motion (the “**Hearing**”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if any, establish just cause for the relief granted herein; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor, its creditors, its estate, and all other parties in interest; and all objections and reservations of rights filed or asserted with respect to the Motion, if any, having been withdrawn, resolved, or overruled; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth in this order (this “**Bar Date Order**”).
2. Unless otherwise provided herein, the following Bar Dates are hereby established

in this Chapter 11 Case:

- a. 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from service of the Bar Date Notice as the deadline (the “**General Bar Date**”) for each person or entity, other than a governmental unit, to file a proof of claim with respect to any prepetition claim against the Debtor, including, without limitation, any secured claim, unsecured claim, priority claim, claim asserted under section 503(b)(9)³ of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days before the Petition Date, unless otherwise provided in this Bar Date Order;
- b. December 16, 2025 as the deadline (the “**Government Bar Date**”) by which a governmental unit must file a proof of claim with respect to a prepetition claim against the Debtor;
- c. the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the later of (A) the date of the entry of an order approving rejection of an executory contract or unexpired lease of the Debtor, and (B) the effective date of rejection of an executory contract or unexpired lease of the Debtor as the deadline (the “**Rejection Bar Date**”) by which an entity asserting a claim for damages against the Debtor arising

³ Section 503(b)(9) of the Bankruptcy Code states that “[a]fter notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including . . . the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.”

from such rejection must file a proof of claim on account of such damages;
and

- d. the later of (i) the General Bar Date or the Government Bar Date (only if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtor's Schedules as the deadline (the "**Amended Schedule Bar Date**") for an entity whose claim is affected by such amendment to file, amend, or supplement a proof of claim with respect to such claim.

3. The Claim Form, substantially in the form attached hereto as **Exhibit 1**, the Bar Date Notice, substantially in the form attached hereto as **Exhibit 2**, are each hereby approved.

Who Must File a Proof of Claim

4. Except as otherwise set forth herein, the following persons or entities asserting claims against the Debtor arising, or deemed to arise, before the Petition Date are required to file proofs of claim by the applicable Bar Date (regardless of whether such claims are secured or unsecured, priority or nonpriority, or otherwise) if such persons or entities wish to be treated as creditors with respect to such claims for the purposes of voting and distribution in this case:

- a. any person or entity whose claim is not listed on the Debtor's Schedules;
- b. any person or entity whose claim is listed on the Debtor's Schedules as contingent, unliquidated, or disputed;
- c. any person or entity whose claim is improperly classified on the Debtor's Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount than identified in the applicable Schedules;
- d. any person or entity who believes that its claim against the Debtor is or may be entitled to priority under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days of the Petition Date;
- e. any person or entity who asserts a claim arising from the rejection of an executory contract or unexpired lease of the Debtor and has not previously filed any such claim;

- f. any person or entity who asserts a claim against the Debtor arising from or relating to the purchase or sale of any security of the Debtor, including, without limitation, any equity security; and
- g. any person or entity who asserts a claim arising from or relating to pending or threatened litigation against the Debtor, including any claim arising for alleged wage and hour violations or unfair business practices.

Who is Not Required to File a Proof of Claim

5. The following persons or entities holding prepetition claims against the Debtor shall not be required to file proofs of claim:

- a. any person or entity whose claim is listed on the Schedules, if (i) the claim is not listed as contingent, unliquidated, or disputed, and (ii) the person or entity does not disagree with the amount, nature, or priority of the claim as identified on the Schedules;
- b. any person or entity who has already filed with Reliable or with the Clerk of Court a signed proof of claim against the Debtor utilizing Official Form B410 or a claim form that substantially conforms to such official form, including by providing all of the information required by such form and the procedures set forth herein;
- c. any person or entity whose claim is allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense (other than a claim arising under section 503(b)(9) of the Bankruptcy Code);
- d. any person or entity whose claim has been allowed by order of the Court entered on or before the applicable Bar Date;
- e. any person or entity whose claim has been paid in full in accordance with an order of the Court entered on or before the applicable Bar Date;
- f. any person or entity whose claim is based solely on owning an equity security in the Debtor;
- g. any employee of the Debtor who was employed at any time on or after the Petition Date and whose prepetition salary, wages, benefits or other remuneration have been paid pursuant to Court order; provided, however, that all other claims of employees arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, retaliation, wage and hour violations or unfair business practices, must be filed by the applicable Bar Date;

- h. any director, officer, or employee of the Debtor who served in such capacity at any time after the Petition Date for claims based on indemnification, contribution, or reimbursement; and
- i. any contract or lease counterparty whose contract or lease has been assumed or assumed and assigned by the Debtor.

Requirements and Procedures for Filing a Proof of Claim

6. The following procedures and requirements with respect to preparing and filing proofs of claim are hereby established:

- a. Proofs of claim must be submitted on the Claim Form or Official Form B410, or substantially conform to such official form.
- b. Proofs of claim must be written in the English language, denominated in U.S. dollars, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant's attorney or authorized agent.
- c. Electronic proofs of claim. A proof of claim may be filed electronically at <https://www.bankruptcy-claims.com/tsfood/CaseHome.aspx> using the interface available after clicking the link titled "Submit a Claim." A claim must be submitted **so as to be actually received** on or before the applicable Bar Date.
- d. Hardcopy proofs of claim. An original, signed copy of the proof of claim must be sent **so as to be actually received, post mark date is insufficient,** on or before the applicable Bar Date as follows:

By U.S. Mail or other hand delivery system:

T&S Food Services II, LLC Bankruptcy Claims Processing Center
c/o Reliable Companies
1007 North Orange Street, Suite 110
Wilmington, DE 19801

- e. Other methods not accepted. Proofs of claim sent by means other than as described above, including by means of email or fax, will not be accepted.

7. The Debtor, with assistance from Reliable, will provide each creditor listed on the Debtor's Schedules with a personalized Claim Form indicating how the creditor's claim is reflected on the Schedules, including: (i) the amount of the scheduled claim, if any; (ii) whether

the claim is contingent, unliquidated, or disputed; and (iii) whether the claim is listed as secured, unsecured priority, or unsecured nonpriority.

Consequences of Failure to File a Proof of Claim or Administrative Claim

8. Absent further order of the Court to contrary, any entity who is required (and not exempt) under this Bar Date Order, but fails, to submit a proof of claim in accordance with this Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtor and its property, shall be forever enjoined from asserting claims for any and all indebtedness or liability with respect to or arising from such claim in this Chapter 11 Case. Without limiting the foregoing sentence, any creditor asserting a claim entitled to priority pursuant to section 503(b)(9) of the Bankruptcy Code that fails to file a proof of claim in accordance with this Bar Date Order shall not be entitled to any priority treatment on account of such claim pursuant to section 503(b)(9) of the Bankruptcy Code, regardless of whether such claim is identified on the Schedules as contingent, not disputed, and not liquidated.

9. Pursuant to Bankruptcy Rule 3003(c)(2), any holder of a prepetition claim who is required to file but fails to file such claim in accordance with the foregoing requirements and procedures before the applicable Bar Date shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution in this Chapter 11 Case.

Actual Notice of the Bar Dates to Known Potential Creditors

10. Pursuant to Bankruptcy Rule 2002(a)(7), (f), and (p), the Debtor shall provide the Bar Date Notice Package to the following potential creditors and other parties in interest, wherever located:

- a. the Office of the U.S. Trustee;
- b. all known creditors and other known holders of potential claims against the Debtor or its estate;

- c. all parties who have filed claims in this Chapter 11 Case, including administrative expense claims, as of the date of entry of the Bar Date Order;
- d. all counterparties to executory contracts and unexpired leases listed on the Schedules at the addresses stated therein or as updated by a counterparty pursuant to the terms of the contract or lease;
- e. all parties who have filed a request for notice in this Chapter 11 Case pursuant to Bankruptcy Rule 2002 as of the date of entry of the Bar Date Order;
- f. all parties who have otherwise filed a document in this Chapter 11 Case and are identified on the Court's electronic docket as of the date of entry of the Bar Date Order;
- g. all employees of the Debtor as of the Petition Date;
- h. all taxing authorities for jurisdictions in which the Debtor does business or did business within three (3) years prior to the Petition Date;
- i. all government agencies that regulate the Debtor's business;
- j. the office of the attorney general for each state in which any Debtor is incorporated or maintained or conducted business within three (3) years prior to the Petition Date;
- k. all known lienholders;
- l. all parties to litigation pending or threatened against the Debtor as of the date of entry of the Bar Date Order;
- m. all providers of utility services to the Debtor as of the Petition Date;
- n. the Debtor's current and past insurance providers under whose policies open claims remain pending;
- o. the Debtor's ordinary course professionals;
- p. the Debtor's banks; and
- q. all parties included on the creditor matrix filed in this Chapter 11 Case.

Supplemental Service

11. After the initial service of the Bar Date Notice Packages, the Debtor may, in its discretion, make supplemental service of the Bar Date Notice Package, including in the event that:

(a) notices are returned by the post office with forwarding addresses; and (b) additional potential claimants become known after the initial service of the Bar Date Notice Packages. For holders of claims receiving such supplemental service, except for entities that are exempt from complying with the applicable Bar Dates as set forth in this Bar Date Order, the deadline to file proofs of claim, if necessary, shall be the later of (a) the Bar Date or the Government Bar Date, as applicable, or (b) 5:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days from the supplemental service of the Bar Date Notice Packages (or another time period as may be fixed by the Court).

Additional Relief

12. The Debtor and Reliable are authorized and empowered to take such steps and perform such actions as may be necessary to implement and effectuate the terms of this Bar Date Order, including without limitation, paying of costs incurred in connection with noticing the Bar Dates.

13. The Debtor and Reliable are authorized to redact from the claims register the home addresses of individuals, including the Debtor's individual creditors and interest holders, employees, former employees, and equity holders. Redactions beyond the above-listed categories require a further order of this Court.

14. The Debtor is authorized to serve the notices required under Bankruptcy Rule 2002(d) on the registered holders of the Debtor's equity securities.

15. Notification of the relief granted by this Bar Date Order as provided herein is fair and reasonable and will provide good, sufficient, and proper notice to all creditors of their rights and obligations in connection with claims they may have against the Debtor in this case.

16. Nothing in this Bar Date Order shall prejudice the right of the Debtor or its estate, or any other party in interest, to dispute or assert offsets or defenses to any claim reflected in the Schedules or otherwise.

17. The terms and conditions of this Bar Date Order shall be immediately effective and enforceable upon its entry.

18. The Debtor may make corrections, additions, or deletions to the Bar Date Notice Package as appropriate, including to remove stale or non-pertinent information.

19. This Court shall retain jurisdiction over all matters arising out of or related to the Motion and this Bar Date Order.

EXHIBIT 1

Claim Form

Fill in this information to identify the case:

Debtor 1 T&S Food Services II, LLC

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: District of Delaware

Case number 25-11178 (TMH)

Official Form 410

Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.¹

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. **Who is the current creditor?** _____
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. **Has this claim been acquired from someone else?** No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name _____	Name _____
	Number _____ Street _____	Number _____ Street _____
	City _____ State _____ ZIP Code _____	City _____ State _____ ZIP Code _____
	Contact phone _____	Contact phone _____
	Contact email _____	Contact email _____
	Uniform claim identifier (if you use one): _____	

4. **Does this claim amend one already filed?** No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____
MM / DD / YYYY

5. **Do you know if anyone else has filed a proof of claim for this claim?** No
 Yes. Who made the earlier filing? _____

1. Section 503(b)(9) of the Bankruptcy Code states that "[a]fter notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including . . . the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business."

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. How much is the claim? \$_____. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.

Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check one:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$17,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

8 _____
Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code

Contact phone _____ Email _____

EXHIBIT 2

Bar Date Notice

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

In re:)	
)	Chapter 11
T&S FOOD SERVICES II, LLC, ¹)	
Debtor.)	Case No. 25-11178 (TMH)
)	

**NOTICE OF BAR DATES FOR FILING PROOFS
OF CLAIM AGAINST THE DEBTOR**

On June 19, 2025 (the “**Petition Date**”), T&S Food Services II, LLC (the “**Debtor**”) filed a voluntary chapter 11 petition in the United States Bankruptcy Court for the District of Delaware (the “**Court**”) under case no. 25-11178 (TMH).

On [●], 2025, the Court entered an order (the “**Bar Date Order**”)² establishing the following deadlines for filing certain prepetition claims and administrative expense claims in the Debtor’s Chapter 11 Case:

- (a) **30 days from service of this notice, 2025, 5:00 p.m. prevailing Eastern Time** as the deadline (the “**General Bar Date**”) to file a proof of claim with respect to any prepetition claim against the Debtor, including, without limitation, any secured claim, unsecured claim, priority claim, or claim asserted under section 503(b)(9)³ of the Bankruptcy Code for goods delivered and received by the Debtor within twenty (20) days before the Petition Date, unless otherwise provided in the Bar Date Order.

- (b) **December 16, 2025** as the deadline (the “**Government Bar Date**”) by which a governmental unit must file a proof of claim with respect to a prepetition claim against the Debtor;

- (c) the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the later of (A) the date of the entry of an order approving rejection of an executory contract or unexpired lease of the Debtor, and (B) the effective date of rejection of an executory contract or unexpired lease of the Debtor as the deadline (the “**Rejection Bar Date**”) for

¹ The last four digits of the Debtor’s federal tax identification number are 4244 and the Debtor’s mailing address is 201 B West Butler Road, Suite 1101, Mauldin, South Carolina 29662.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Bar Date Order.

³ Section 503(b)(9) of the Bankruptcy Code states that “[a]fter notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including . . . the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.”

an entity asserting a claim for damages against the Debtor arising from such rejection to file a proof of claim on account of such damages; and

(d) the later of (i) the General Bar Date or the Government Bar Date (if applicable), and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtor's schedules of assets and liabilities (the "**Schedules**") as the deadline (the "**Amended Schedule Bar Date**") for an entity whose claim is affected by such amendment to file, amend, or supplement a proof of claim with respect to such claim.

Consult the Bar Date Order for Details on Who Must File a Claim. Consult the Bar Date Order for additional details on whether you are required to file a proof of claim. Copies of the Bar Date Order, the Schedules, and other documents and information regarding the Chapter 11 Case are available free of charge at <https://www.bankruptcy-claims.com/tsfood/CaseHome.aspx>.

Instructions for Filing Proofs of Claim for Prepetition Claims. Any person or entity asserting a prepetition claim against the Debtor **MUST** abide by the following procedures and requirements in preparing and filing proofs of claim:

Proofs of claim must be (a) submitted on the enclosed Claim Form or Official Form B410, and (b) written in the English language, denominated in U.S. dollars, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant's attorney or authorized agent.

Proofs of claim may be filed electronically at <https://www.bankruptcy-claims.com/tsfood/CaseHome.aspx> using the interface available after clicking the link titled "Submit A Claim." If filed by hardcopy, an original, signed copy of the proof of claim must be sent to:

By U.S. Mail or other hand delivery system:
T&S Food Services II, LLC Bankruptcy Claims Processing Center
c/o Reliable Companies
1007 North Orange Street, Suite 110
Wilmington, DE 19801

A claim must be submitted **so as to be actually received, the post mark date is insufficient,** on or before the applicable Bar Date. Proofs of claim sent by means other than as described above will not be accepted.

Consequences of Failing to Timely File Your Claim. ABSENT FURTHER ORDER OF THE COURT, ANY HOLDER OF A CLAIM THAT IS NOT EXEMPTED FROM THE REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH ABOVE, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN THE APPROPRIATE FORM BY THE APPLICABLE BAR DATE AS DESCRIBED IN THIS NOTICE SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THE DEBTOR BELIEVES YOU HAVE A CLAIM.

Additional Information. Copies of the Debtor's Schedules, the Bar Date Order, and certain other pleadings, orders, and notices, and other information regarding the Chapter 11 Case are available for inspection free of charge on the Debtor's website at <https://www.bankruptcy-claims.com/tsfood/CaseHome.aspx>. Filings in the Chapter 11 Case are also available for a fee at the Court's website at www.deb.uscourts.gov. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") is required to access this information and can be obtained through the PACER Service Center at <https://www.pacer.gov>. Documents filed in this case also may be examined between the hours of 8:00 a.m. and 4:00 p.m. (prevailing Eastern Time), Monday through Friday, at the Office of the Clerk of the Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801.

If you have any questions relating to this notice, please contact the Debtor's Claims and Noticing Agent, Reliable Companies d/b/a Reliable, via email at bankruptcy@reliable-co.com. Please take note that the Debtor's Claims and Noticing Agent cannot provide legal advice.

Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtor's right to: (a) dispute, or assert offsets or defenses against, any claim as to the nature, amount, liability, or classification thereof; (b) subsequently designate any claim as disputed, contingent, or unliquidated; and (c) otherwise amend or supplement its Schedules.

Dated: October [●], 2025

CLARK HILL PLC

/s/ _____
Karen M. Grivner (Bar No.4372)
824 N. Market Street, Suite 710
Wilmington, Delaware 19801
Telephone: (302) 250-4750
Facsimile: (302) 421-9439
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- and -

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