

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

PLENTY UNLIMITED TEXAS LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 25-90105 (CML)

(Jointly Administered)

**NOTICE OF CANCELLATION OF AUCTION
AND DESIGNATION OF SUCCESSFUL BID**

PLEASE TAKE NOTICE that, on March 23, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Emergency Motion for Entry of an Order (I)(A) Approving Bid Procedures and Authorizing Sale Transaction; (B) Approving the Selection of Stalking Horse Bidder and Authorizing the Debtors’ Entry Into the Stalking Horse Agreement; (C) Scheduling Auction and Sale Hearing; (D) Approving Sale Notices; (E) Approving Assumption and Assignment Procedures; and (II) Granting Related Relief* [Docket No. 31] (the “Bid Procedures Motion”), which Bid Procedures Motion was granted by the Court on March 24, 2025 [Docket No. 57] (the “Bid Procedures Order”).²

PLEASE TAKE FURTHER NOTICE that, other than the Stalking Horse Bid, the Debtors did not receive any Qualified Bids by the Bid Deadline.

PLEASE TAKE FURTHER NOTICE that, consistent with the Bid Procedures Order, the Debtors, in consultation with the Consultation Parties, have **cancelled** the Auction scheduled for April 28, 2025, and hereby designate One Madison Group – Pluto, LLC as the Successful Bidder and the Stalking Horse Agreement as the Successful Bid for those assets covered by the Stalking Horse Agreement.

PLEASE TAKE FURTHER NOTICE that, under the Stalking Horse Agreement, the Stalking Horse Bidder has the right to designate 365 Contracts to which one or more Sellers is a party at any time up to five (5) days prior to the closing.

PLEASE TAKE FURTHER NOTICE that, consistent with the Bid Procedures, if the Debtors elect to toggle to the Sale Transaction, the hearing to consider approval of the Sale

¹ The Debtors in these chapter 11 cases, together with the last four digits of each of the Debtors’ federal tax identification numbers, are: Plenty Unlimited Texas LLC (3500); Plenty Unlimited Inc. (0916); MJNN LLC (N/A); White Farms LLC (N/A); Blue Gardens LLC (8487); Bright Agrotech, Inc. (4106); and P F2 VA LLC (9633). The Debtors’ service address is 1461 Commerce Drive, Laramie, WY 82070.). The Debtor’s service address is 2445 Technology Forest Blvd., Suite 800, The Woodlands, TX 77381.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Bid Procedures Order or the Stalking Horse Agreement, as applicable.

Transaction will be held on **May 14, 2025 at 1:00 p.m. (CT)**. Any objections to the Sale Transaction, any Cure Amount, or to the assumption of the 365 Contracts – including with respect to adequate assurance of future performance – must be filed and served as required under the Bid Procedures Order by no later than **4:00 p.m. (CT) on May 6, 2025**. If the Debtors proceed with the Reorganization Transaction, the hearing to consider approval of the Reorganization Transaction will be held on **May 14, 2025 at 1:00 p.m. (CT)**.

PLEASE TAKE FURTHER NOTICE that copies of the foregoing pleadings may be obtained (i) at the website established by the Debtors' noticing agent, Stretto, at <https://cases.stretto.com/PlentyUnlimited>, (ii) from the Court's website <http://www.txs.uscourts.gov> via ECF/Pacer, or (iii) upon request to the undersigned.

Dated: April 25, 2025
Houston, Texas

**WILSON SONSINI GOODRICH &
ROSATI, P.C.**

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Certificate of Service

I certify that on April 25, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Maegan Quejada
Maegan Quejada