

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

In re:

Chapter 11

PLENTY UNLIMITED TEXAS LLC, et al.,¹

Case No. 25-90105 (CML)

Debtors.

(Jointly Administered)

**THE LIQUIDATION TRUST’S MOTION TO EXTEND TIME TO FILE OBJECTIONS
TO CLAIMS**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

The Liquidation Trust (the “Trust”), successor in interest to Plenty Unlimited Texas LLC and its debtor affiliates (collectively, the “Debtors”) with respect to the matters set forth herein, by and through the Liquidation Trustee, hereby moves (the “Motion”) the Court for an order extending the date by which objections to proofs of claims must be filed (the “Claims Objection Bar Date”) by up to ninety (90) days, to and including the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed or amended or otherwise asserted or amended

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s 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.

in writing by or on behalf of a holder of a claim. In support of this Motion, the Trust respectfully represents as follows:

Relief Requested

1. The confirmed plan in this bankruptcy case establishes November 25, 2025 as the Trust's initial deadline to file objections to claims filed prior to the Effective Date of the Plan. Objections to claims filed, amended, or otherwise asserted after the Effective Date of the Plan are due on the date that is 180 days after the date that the claim is last filed, amended, or otherwise asserted. These deadlines may be extended by the Court. The Trust has made significant progress in identifying claims that are subject to objection and in beginning to file claims objections. However, the Trust requires an extension to complete its review of the documents supporting the claims and to get all objections on file.

2. Therefore, the Trust respectfully requests entry of an order, substantially in the form attached hereto, granting an extension of the Claims Objection Bar Date by up to 90 days, to the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed, amended, or otherwise asserted or amended in writing by or on behalf of a holder of a claim.

Jurisdiction and Venue

3. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (B). This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012.

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The Trust confirms its consent to the Court's entry of a final order to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or

judgments in connection herewith consistent with Article III of the United States Constitution. The Trust makes this Objection pursuant to Federal Rules of Bankruptcy Procedure (“FRBP”) 9006(b), Local Bankruptcy Rule for the Southern District of Texas 9013-1, and 11 U.S.C. § 105(a).

Case Background

6. On March 23, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”). The Court ordered the Debtors’ cases to be jointly administered under case number 25-90105 on March 24, 2025 [Dkt. No. 37].

7. Additional information regarding the Debtors’ business, capital structure and the circumstances preceding the Petition Date may be found in the *Declaration of Daniel Malech in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Dkt. No. 24] and the *Declaration of Colin M. Adams in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Dkt. No. 23].

8. On March 23, 2025, the Debtors filed an initial proposed plan of reorganization and a *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Plenty Unlimited Texas LLC and its Debtor Affiliates* (the “Disclosure Statement”), [Dkt. No. 27].

9. On May 12, 2025, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization of Plenty Unlimited Texas LLC and Its Debtor Affiliates* (as supplemented and amended in accordance with the Confirmation Order, the “Plan”), [Dkt. No. 339].

10. On May 15, 2025, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosure Statement on a Final Basis and (II) Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of Plenty Unlimited Texas LLC and Its*

Debtor Affiliates (the “Confirmation Order”), [Dkt. No. 368].

11. The Plan became effective on May 29, 2025 (the “Effective Date”). *See Notice of (I) Entry of Order Approving Disclosure Statement on a Final Basis and Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of Plenty Unlimited Texas LLC and Its Debtor Affiliates and (II) Occurrence of the Effective Date* [Dkt. No. 394].

12. The Plan and the Confirmation Order provided for the establishment of the Trust as set forth in the Liquidation Trust Agreement. The confirmed Plan and Liquidation Trust Agreement provide that the Trust, through its Trustee and in consultation with the Debtors, has the power to bring claims objections. *Plan* at § IV(S)(3)(a).

13. The Plan provides that objections to proofs of claims “shall be served and Filed (a) on or before the date that is one hundred and eighty days following the later of (i) the Effective Date and (ii) the date that a Proof of Claim is Filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a Holder of a Claim or (b) such later date as ordered by the Bankruptcy Court.” *Id.* at § VII(B).

14. While some claims were filed after the Effective Date, and therefore have later opposition deadlines, the vast majority of the claims in this case were filed prior to the Effective Date.

15. The date that is 180 days after the Effective Date is November 25, 2025.

Argument

A. The Court Has Authority to Extend the Claims Objection Bar Date Per the Confirmed Plan and the Bankruptcy Rules

16. The Plan made explicit that the Court may modify the Claims Objection Bar Date by providing that it may occur on “such later date as ordered by the Bankruptcy Court.” *Id.* The

Plan does not specify any particular showing or burden of proof that must be satisfied for the Court to grant a request to extend the deadline.

17. FRBP 9006(b)(1) provides, in relevant part, that when “a court order requires or allows an act to be performed at or within a specified period . . . the court may – at any time and for cause – extend the time to act” on a request made before the period expires, with certain inapplicable exceptions.

18. The Court is also empowered to run its cases as appropriate to implement the purposes of the Bankruptcy Code. 11 U.S.C. § 105(a). No showing of cause is necessary for the Court to issue an order pursuant to Section 105.

19. Pursuant to the Confirmed Plan, the Federal Rules of Bankruptcy Procedure, and the Bankruptcy Code, then, this Court may extend the Claims Objection Bar Date. The Trust asks the Court to exercise its power to grant this Motion and extend the Claims Objection Bar Date to the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a holder of a claim, without prejudice to the Trust’s right to make further requests.

B. The Trust Requires Additional Time to Review Supporting Documents and Determine Which Claims are Properly Subject to Objection

20. Per the Plan and Section 105, the Court may grant this Motion without cause. Nevertheless, cause exists to grant the Motion. The Trust was formed as of the Effective Date, May 29, 2025. Since its formation, the Trust, through its counsel and financial advisor, have received at least hundreds of pages of documents from the Debtors.

21. The Trust professionals have made substantial progress in completing a thorough review of the claims, but due to the volume of documents, has not gotten through them all.

22. The Trust will be filing its first two omnibus claims objections in the coming days, which, consistent with the *Order Approving Omnibus Claims Objection Procedures and Filing of Substantive Omnibus Claims Objections* are numbered omnibus objections two and three. However, these two omnibus objections do not encompass the entire universe of claims objections which the Trust feels are proper to bring in this case.

23. The Trust has identified additional claims objections that should be made and is in the process of ensuring that it has the proper supporting documents for each objection. Given the volume of documents the Trust has, this task is not yet complete. Given the holidays in the months of November and December, the Trust asks the Court for an extension of up to 90 days, to February 23, 2026, to file these additional claims objections.

I. CONCLUSION

For the reasons set forth herein, the Trust respectfully requests that the Court issue an order extending the Claims Objection Bar Date by up to 90 days, the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a holder of a claim, without prejudice to the Trust's right to request further extensions if appropriate, and grant any such other relief as the Court may deem proper.

BRINKMAN LAW GROUP, PC

Dated: November 24, 2025

By: /s/ Daren R. Brinkman
Daren R. Brinkman (TX Bar No. 03004490)
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Counsel for the Liquidation Trustee

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2025, a true and correct copy of the foregoing document was served by the Court's Electronic Case Filing (ECF) system on all parties registered to receive electronic service in these cases.

/s/ Daren R. Brinkman
Daren R. Brinkman

**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)

**ORDER SUSTAINING THE LIQUIDATION TRUST'S MOTION TO EXTEND TIME
TO FILE OBJECTIONS TO CLAIMS**

(Relates to Docket No. ____)

Upon the motion (the “Motion”)² of the Liquidation Trust (the “Trust”), successor in interest to Plenty Unlimited Texas LLC and its debtor affiliates with respect to the matters set forth in the Motion, for an order extending the date by which objections to proofs of claims must be filed (the “Claims Objection Bar Date”) by up to ninety (90) days, to and including the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed or amended or otherwise asserted or amended in writing by or on behalf of a holder of a claim; and this Court having jurisdiction over this matter in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

the Motion in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the 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 this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Claims Objection Bar Date is hereby extended to the later of February 23, 2026 or the date that is 180 days after the date that a claim is filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a holder of a claim.
3. This Order is without prejudice to the Trust's right to make further requests to extend the Claims Objection Bar Date.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE
Christopher M. Lopez