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*Proposed Attorneys for the Chapter 11
Debtors and Debtors-in-Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

BREWSTER HEIGHTS PACKING &
ORCHARDS, LP,¹

Debtors.

Chapter 11

Lead Case No. 26-01136

Jointly Administered

APPLICATION FOR ORDER
APPROVING EMPLOYMENT OF
KATTEN MUCHIN ROSENMAN LLP

¹ The debtors are Brewster Heights Packing & Orchards, LP (Case No. 26-01136); Gebbers Farms Inc. (Case No. 26-01140); Gebbers Orchards, Inc. (Case No. 26-01141); C&M II, LLC (Case No. 26-01137); D&E Storage, LLC (Case No. 26-01138); Eastco, LLC (Case No. 26-01139); GF SA, LLC (Case No. 26-01142); Northco, LLC (Case No. 26-01143); P&G Orchards, LLC (Case No. 26-01144); REPO, LLC (Case No. 26-01145); TJF Properties, LLC (Case No. 26-01146); Westco Orchards, LLC (Case No. 26-01147); and Westco Sales, Inc. (Case No. 26-01148) (collectively, the "Chapter 11 Cases").

1 Come now, the undersigned debtors and debtors-in-possession (collectively, the
2 “Debtors”) and apply to the Court for an order approving the employment of Katten
3 Muchin Rosenman LLP (“Katten”) as counsel for the Debtors in the above-captioned
4 chapter 11 cases (the “Chapter 11 Cases”).

5 For purposes of this application and verification and the disclosures contained herein, the
6 term APPOINTEE shall include the named appointee, and if the named appointee is a
7 law partnership or corporation or an accounting partnership or corporation, or is an
8 attorney or accountant employed as a partner, member, or regular associate of a
9 partnership or corporation, the named appointee and each member, partner or regular
10 associate of such partnership or corporation.

11 Applicant and Appointee in making and verifying this application understand that
12 appointee is a fiduciary to the estate or creditors’ committee as appropriate and is
13 obligated to fully and candidly disclose all material facts relating to the employment and
14 is obligated to timely disclose subsequently discovered material facts.

15 Your applicant makes the following representations under penalty of perjury and
16 subject to 18 U.S.C. § 152:

17 1. That the specific facts showing the necessity for the employment are:

18 The Debtors commenced these Chapter 11 Cases and are authorized to continue to
19 operate their businesses and manage their properties as debtors and debtors in possession
20 pursuant to sections 1107(a) and 1108 of the United States Code (the “Bankruptcy
21 Code”). It is necessary for Debtors to employ counsel to render professional services in
22 connection with the prosecution of these Chapter 11 Cases to enable the Debtors to fulfill
23 their duties as debtors in possession. Pursuant to Bankruptcy Code §§ 327(a) and 330 and
Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),
the Debtors seek entry of an order authorizing the Debtors to retain and employ Katten
as their counsel, effective as of the Petition Date.

1 2. That the reason for the selection of the above-named appointee is:

2 The Debtors seek to retain Katten because of Katten's recognized expertise and
3 extensive experience and knowledge in the fields of debtors' protections, creditors'
4 rights, and business reorganizations under chapter 11 of the Bankruptcy Code. Katten is
5 familiar with the Debtors' businesses and the types of legal issues that may arise in the
6 context of these Chapter 11 Cases. Katten possesses extensive experience in practicing
7 before bankruptcy courts throughout the United States. The Debtors believe that Katten
8 is both well-qualified and able to represent the Debtors in these Chapter 11 Cases in an
9 efficient and timely manner. Furthermore, Katten has represented the Debtors,
10 prepetition, in their restructuring activities during the critical times and events leading
11 into these Chapter 11 Cases.

12 3. That the professional services to be rendered are:

13 Subject to further order of this Court, the Debtors anticipate that the services to be
14 performed by Katten will include, without limitation: (i) advising the Debtors with respect
15 to their powers and duties as debtors in possession in the continued management and
16 operation of their businesses and properties; (ii) advising and consulting on the conduct
17 of these Chapter 11 Cases, including all of the legal and administrative requirements of
18 operating in chapter 11; (iii) attending meetings and negotiating with representatives of
19 creditors and other parties in interest; (iv) taking all necessary actions to protect and
20 preserve the Debtors' estates, including prosecuting actions on the Debtors' behalf,
21 defending any action commenced against the Debtors, and representing the Debtors in
22 negotiations concerning litigation in which the Debtors are involved, including objections
23 to claims filed against the Debtors' estates; (v) preparing pleadings in connection with

1 these Chapter 11 Cases, including motions, applications, answers, orders, reports, and
2 papers necessary or otherwise beneficial to the administration of the Debtors' estates; (vi)
3 representing the Debtors in connection with obtaining authority to obtain postpetition
4 financing and use cash collateral; (vii) advising the Debtors in connection with the
5 potential sale of assets; (viii) appearing before the Court and any appellate courts to
6 represent the interests of the Debtors' estates; (ix) advising the Debtors regarding tax
7 matters; (x) taking any necessary action on behalf of the Debtors to negotiate, prepare,
8 and obtain approval of a disclosure statement and confirmation of a chapter 11 plan and
9 all documents related thereto; and (xi) performing all other necessary legal services for
10 the Debtors in connection with the prosecution of these Chapter 11 Cases, including
11 analyzing the Debtors' leases and contracts and the assumption and assignment or
12 rejection thereof, analyzing the validity of liens against the Debtors, and advising the
13 Debtors on corporate and litigation matters.

14 4. That appointee is qualified to provide the services to be rendered based on the
15 following:

16 Katten is a law firm that employs over 700 attorneys worldwide and maintains
17 offices for the practice of law at 2121 N. Pearl Street, Suite 1100, Dallas, Texas, 75201,
18 as well as offices in New York, New York; Chicago, Illinois; Washington, D.C.;
19 Charlotte, North Carolina; Los Angeles, California; London, England; and Shanghai, P.R.
20 China. Katten has been actively involved in major chapter 11 cases and has represented
21 debtors, both as lead counsel and conflicts counsel, in cases in multiple Districts,
22 including: *In re Capstone Green Energy Corp.*, No. 23-11634 (LSS) (Bankr. D. Del. Sept.
23 28, 2023); *In re Hartman SPE, LLC*, No. 23-11452 (MFW) (Bankr. D. Del. Sept. 13,

2023); *In re Soft Surroundings Holdings, LLC*, 23-90769 (CML) (Bankr. S.D. Tex. Sept. 10, 2023); *In re CraftWorks Parent, LLC*, No. 20-10475 (BLS) (Bankr. D. Del. Apr. 11, 2020); *In re Barneys New York, Inc.*, No. 19-36300 (CGM) (Bankr. S.D.N.Y. Sept. 19, 2019); *In re Sizmek, Inc.*, No. 19-10971 (SMB) (Bankr. S.D.N.Y. Apr. 23, 2019); *In re Windstream Holdings, Inc.*, No. 19-22312 (RDD) (Bankr. S.D.N.Y. Apr. 22, 2019); *In re J&M Stores, Inc.*, No. 18-11901 (LSS) (Bankr. D. Del. Aug. 27, 2018); *In re Vitamin World, Inc.*, No. 17-11933 (KJC) (Bankr. D. Del. Oct. 18, 2017).

5. That any proposed arrangement as to compensation, including hourly rates or flat fees if applicable, is as follows, but that approval of that arrangement and any payment or allowance of compensation for services rendered or reimbursement of expenses will be in accordance with 11 U.S.C. §§ 329 and 330 and FRBP 2016:

Katten intends to apply for compensation for professional services rendered on an hourly basis and reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the Court's approval and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and any other applicable procedures and orders of the Court. Katten's current hourly rates for matters related to these Chapter 11 Cases range as follows: Partners: \$1,395–\$1,870; Associates: \$835–\$990; Paraprofessionals: \$570. These hourly rates are subject to periodic adjustments to reflect economic and other conditions. Katten will provide reasonable notice to the Debtors and other relevant parties in connection with any increase of Katten's hourly billing rates. Moreover, these hourly rates are consistent with the rates that Katten charges other comparable chapter 11 clients, regardless of the location of the chapter 11 case. The rate structure provided by Katten is appropriate and not significantly different from (i) the rates that Katten charges for other similar types of representations or (ii) the rates that

1 other comparable counsel would charge to do work substantially similar to the work
2 Katten will perform in these Chapter 11 Cases.

3 Katten's hourly rates are set at a level designed to compensate Katten fairly for the
4 work of its attorneys and paraprofessionals and to cover fixed and routine expenses.
5 Hourly rates vary with the experience and seniority of the individuals assigned. It is
6 Katten's policy to charge its clients for identifiable, non-overhead expenses incurred in
7 connection with the client's case, including postage, overnight mail, courier delivery,
8 transportation, overtime expenses, computer-assisted legal research, photocopying,
9 airfare, meals, and lodging. Katten currently charges \$0.10 per page for standard black-
10 and-white duplication and \$0.25 per page for color duplication. Katten does not charge
11 for incoming facsimile transmissions.

12 6. That appointee is a relative of the bankruptcy judge assigned the case.

13 ☐ Yes ☒ No ☐ N/A

14 7. That appointee does hold or represent an interest adverse to the estate, that
15 appointee is not a disinterested person, or that appointee has served as examiner in the
case.

16 ☐ Yes ☒ No ☐ N/A

17 If YES, explain:

18
19 8. That appointee is not and will not while employed by the committee represent any
20 other entity having an adverse interest in connection with the case.

21 ☐ Yes ☐ No ☒ N/A

22 If YES, explain:

9. That to best of your applicant's knowledge, all of the appointee's connections with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, any person employed in the office of the United States Trustee or the bankruptcy judge assigned the case are as follows:

See attached **Exhibit A**.

A. That appointee is a creditor as defined by 11 U.S.C. § 101(10).

☐ Yes

☒ No

If YES, complete the following:

Date on any waiver, set-off or assignment: _____

Type of debt incurred: _____

Payment made: \$ _____

Date incurred: _____

Date payment made: _____

Amount incurred: \$ _____

Amount of payment: \$ _____

Remaining Balance: \$ _____

B. That appointee is indebted to the debtor or to the estate?

☐ Yes

☒ No

If YES, complete the following:

Type of debt incurred: _____

Payment made: \$ _____

Date incurred: _____

Date payment made: _____

Amount incurred: \$ _____

Amount of payment: \$ _____

Remaining Balance: \$ _____

C. That appointee has or presently represents an entity that could be classified as a creditor as defined by 11 U.S.C. § 101(10)?

☒ Yes

☐ No

If YES, provide the following and any other relevant information as to each such entity:

- 1 a) name
2 b) dates, capacity, and scope of representation
3 c) actual or possible conflicts according to any applicable code or rules of
4 professional conduct, including discussion as to any waivers received or given

5 See attached **Exhibit A.**

6 D. That appointee is or has been an equity security holder as defined in 11
7 U.S.C. § 101(17)?

8 ☐ Yes

9 ☒ No

10 YES, provide the following and any other relevant information as to each such equity
11 security interest:

- 12 a) description of each interest
13 b) amount of each interest
14 c) dates each interest held
15 d) dates and manner of disposal of each interest

16 E. That appointee has or presently represents an equity security holder as
17 defined by 11 U.S.C. § 101(17)?

18 ☐ Yes

19 ☒ No

20 If YES, provide the following and any other relevant information as to each such equity
21 security holder:

- 22 a) name of holder
23 b) dates, capacity, and scope of representation
c) actual or possible conflicts according to any applicable code or rules of
professional conduct, including discussion as to any waivers received or given.

F. That appointee is or has been an insider as defined by 11 U.S.C. § 101(31)?

☐ Yes

☒ No

If YES, fully explain and provide any and all relevant information pertaining thereto.

1 G. That appointee has or presently represents an insider as defined by 11
2 U.S.C. § 101(31)?

3 ☐ Yes ☒ No

4 If YES, provide the following and any other relevant information pertaining thereto as
5 to each such insider:

- 6 a) name
7 b) dates, capacity, and scope of representation
8 c) actual or possible conflicts according to any applicable code or rules of
9 professional conduct, including discussion as to any waivers received or given.

10 H. That appointee has or presently represents the debtor?

11 ☒ Yes ☐ No

12 If YES, provide the following and any other relevant information pertaining thereto.

13 a) name:

14 All Debtors in these Chapter 11 Cases.

15 b) dates, capacity, and scope of representation:

16 Effective as of the Petition Date. Counsel for the Debtors and Debtors-in-
17 Possession

18 Katten has represented the Debtors on general corporate and litigation matters
19 since March 30, 2022. Katten was formally engaged as *restructuring counsel* for the
20 Debtors pursuant to an engagement agreement dated March 31, 2025. Katten's
21 restructuring representation included services related to multiple forbearances, an in-
22 court or out-of-court restructuring, or sale of the Debtors. Katten's scope of representation
23 as counsel for the Debtors includes, without limitation, the services described in Question

3 above. Katten is seeking approval of its retention as counsel effective as of the Petition Date.

c) actual or possible conflicts according to any applicable code or rules of professional conduct, including discussion as to any waivers received or given.

Katten does not believe there are any actual or possible conflicts in connection with its representation of the Debtors. To the extent any actual conflicts arise, Bush Kornfeld has been retained as conflicts counsel. Katten is a “disinterested person” within the meaning of Bankruptcy Code § 101(14), as required by § 327(a), and does not hold or represent an interest adverse to the Debtors’ estates.

I. That appointee has had or has participated in any transaction with the debtor, whether or not such transaction involved representation of the debtor? Transactions include but are not limited to any actions under 11 U.S.C. § 329(a) and FRBP 2017(a), involving payments, retainers, set-offs, security agreements, liens, gifts or indentures as defined by 11 U.S.C. § 101(28).

☒ Yes

☐ No

If YES, provide the following and any other relevant information concerning each such transaction:

- a) names of all parties involved
- b) dates and description
- c) amounts involved if applicable
- d) reason for transaction

In the one-year period prior to the Petition Date, Katten received payments totaling \$1,988,118.23. Of that amount, \$221,896.25 was paid by the Debtors’ insurance carrier related to theft of a check from the U.S. Mail that never arrived at Katten. The payment was for services rendered over two years prior to the Petition Date related to an asset acquisition and financing. Of the balance paid to Katten within the one-year period prior

1 to the Petition Date, not all fees paid related to the preparation of these Chapter 11 Cases.
2 Katten's representation of the Debtors during the relevant period included, *inter alia*:

- 3 a) The negotiation and consummation of forbearance agreements with its two primary
4 lenders, BMO Bank, N.A. and The Prudential Insurance Company of America, and
5 multiple extensions thereof;
6 b) Advice and assistance on a pre-bankruptcy sale process, evaluation of sale, and
7 refinancing alternatives;
8 c) Advice and counsel on lender rights and remedies, cash usage, and budgeting, in
9 court and out of court restructuring options, and related matters;
10 d) Advice and counsel on short term liquidity solutions, financing, and vendor
11 relations;
12 e) Working with the Debtors and advisors on debtor in possession financing options
13 and stalking horse transaction proposals; and
14 f) Preparation of and the filing of the Chapter 11 Cases.

15 As of the Petition Date, Katten held, and currently holds, \$0.00 in trust as the balance
16 remaining of its prepetition advance fee deposit.

17 J. That appointee has received or has been promised compensation from debtor
18 or some other entity for services rendered or to be rendered in the case?

19 ☒ Yes

20 ☐ No

21 If YES, provide the following and any other relevant information concerning each such
22 payment or promise.

- 23 a) name of payor or promisor
b) status of payor or promisor
c) relationship between debtor and payor or promisor
d) date of payment or promise
e) amount of payment or promise
f) basis for payment or promise
g) location or disposition of any monies received

24 The Debtors have agreed to compensate Katten for accrued postpetition fees at the
25 hourly rates set forth above and for incurred expenses, subject to Court order on notice to
26 creditors and a hearing, and in accordance with Bankruptcy Code §§ 327 and 330.

1 K. That appointee has caused to be conducted an internal conflicts check in
2 regard to representation of other clients as required by any code or rules of professional
conduct?

3 ☒ Yes ☐ No

4 If YES, state results, if NO, state why it was not done.
5

6 Katten has conducted an internal conflict check regarding its representation
7 of other clients, as required by applicable laws, statutes, or rules of professional
8 conduct. Specifically, Katten conducted a conflicts check on the Top 30 Creditors in
9 these Chapter 11 Cases, as well as the attached list of interested parties attached to
10 this Application as **Exhibit B**. The results of Katten's conflicts checks are fully
11 disclosed and set forth in **Exhibit A**.

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Dated: 6/18/2026

Brewster Heights Packing
& Orchards, LP

Typed Name of Applicant

/s/ *Thomas Buford*

Signature of Applicant

I, the undersigned appointee, do hereby state under penalty of perjury that I have read the above representations and verify that they are true and accurate and that they disclose all material facts required to the best of my knowledge and belief.

Dated: 6/18/2026

John Mitchell

Typed Name of Appointee

/s/ John Mitchell

Signature of Appointee

Phone #: (469) 627-7017

Address: 2121 N. Pearl St., Suite 1100, Dallas, TX 75201

APPLICATION FOR ORDER APPROVING EMPLOYMENT
OF KATTEN MUCHIN ROSENMAN LLP – Page 13

BUSH KORNFIELD LLP
LAW OFFICES
601 Union St., Suite 4630
Seattle, Washington 98101-2373
Telephone (206) 292-2110
Facsimile (206) 292-2104

EXHIBIT A

EXHIBIT A

1. **BMO Bank N.A. and Affiliates** – Other attorneys at Katten represent BMO Bank N.A. and affiliated entities on multiple matters unrelated to the Debtors and these Chapter 11 Cases. Lead counsel, John Mitchell, has not and does not represent BMO Bank in any other matters. BMO Bank N.A. fees amounted to more than 1% but less than 2% of the Firm's revenue during calendar year 2025. Should a direct conflict with BMO Bank arise during these Chapter 11 Cases, the law firm of Bush Kornfeld, acting as conflicts counsel, will represent the Debtors in all matters directly adverse to BMO Bank.
2. **Wells Fargo Bank, N.A.** -- Other attorneys at Katten represent Wells Fargo Bank, N.A. on matters unrelated to the Debtors and these Chapter 11 Cases. Lead counsel, John Mitchell, does not represent Wells Fargo in any other matters. Should a direct conflict with Wells Fargo Bank arise during these Chapter 11 Cases, the law firm of Bush Kornfeld, acting as conflicts counsel, will represent the Debtors in all matters directly adverse to Wells Fargo Bank.
3. **Thomas Edward Christopher Miller** – Other attorneys at Katten represent or formerly represented individuals named Thomas Edward Christopher Miller, Thomas C. Miller and Thomas L. Miller. Upon belief, all are unrelated to the Tom Miller identified as a contract counter party to the Debtors.
4. **Independent Director Craig Barbarosh** – Craig Barbarosh is a former Katten partner who serves as an independent director for the Debtors. He also serves as an independent director on the Boards of Directors of Katten clients Mariner Health Central, Inc., Parkview Operating Company LP, and Parkview Holding Co. GP LLC.
5. **Glacier Bank** – Other attorneys at Katten represent Glacier Bank, an affiliate of each of North Cascades National Bank and Wheatland Bank, on matters unrelated to the Debtors.

6. **The Prudential Insurance Company of America** – Other attorneys at Katten represent PGIM Real Estate, Deerpath Capital Management LP, and PGIM Real Estate Agency Finance, LLC, each an affiliate of The Prudential Insurance Company of America, on matters unrelated to the Debtors or these Chapter 11 Cases. Lead counsel John Mitchell does not represent Wells Fargo in any other matters. Should a direct conflict with Prudential arise during these Chapter 11 Cases, the law firm of Bush Kornfeld, acting as conflicts counsel, will represent the Debtors in all matters directly adverse to Prudential.
7. **Utilities** – Other attorneys at Katten represent various clients (Town of Babylon, Village of Deerfield, Village of Plainfield, and Village of Wilmett) in matters adverse to entities entitled “Department of Public Works.” Upon belief, these engagements are unrelated to the Debtors.
8. **Ferrellgas Partners L.P.** – Other attorneys at Katten represent Ferrellgas Partners L.P. in a matter unrelated to the Debtors.
9. **Cintas Corporation** – Other attorneys at Katten represent affiliates of Cintas Corporation in matters unrelated to the Debtors.
10. **Former Clients and Client Affiliates** – The following entities and affiliates thereof are former clients of Katten, all on matters unrelated to the Debtors: Philadelphia Insurance Companies, Exxon Mobile Corporation (affiliate of Wex Bank), PUD No. 1 Douglas County (upon belief, unrelated to Douglas County PUD), Verizon Wireless, and AT&T Corp.
11. **Contract Counter Parties Gregg Baker and Leo Lopez** – Other attorneys at Katten were involved in matters unrelated to the Debtors (which matters are now closed out) with individuals involved named Leo Lopez and Gregg Baker. Upon belief, there is no relationship to the contract counterparties to the Debtors of the same name.

12. **AltaFresh LLC d/b/a Chelan Fresh** – Prior to these Chapter 11 Cases, Katten represented the BHPO's wholly owned subsidiary, AltaFresh LLC dba ChelanFresh, on restructuring matters. As of the Petition Date, Katten no longer represents AltaFresh as it is not a Debtor in Possession.

EXHIBIT B

BHPO et al
Top 30 Creditors

Counterparty	Amount Outstanding	Affiliate	Address Line	City	State CD	Zip Code
1 The Prudential Insurance Company Of America	\$187,000,000	No	PO BOX 981503	BOSTON	MA	02298-1503
2 BMO Bank N.A.	\$63,025,441	No	PO BOX 515274	LOS ANGELES	CA	90051-6574
3 Ag Solutions Capital (Happy Valley USA Credit)	\$4,200,000	No	ONE ENBARCADER CENTER	SAN FRANCISCO	CA	94111
4 We Ag Finance	\$3,227,638	No	7 EAST WASHINGTON AVE.	YAKIMA	WA	98903
5 Wilbur-Ellis Company LLC	\$2,705,180	No	7 EAST WASHINGTON AVE.	YAKIMA	WA	98903
6 NUTRIEN AG SOLUTIONS,INC	\$2,513,957	No	P.O BOX 1456	OKANOGAN	WA	98840
7 Northwest Wholesale Inc	\$1,680,876	No	5416 ENTERPRISE DRIVE	EAST WENATCHEE	WA	98802
8 Fruit Packers Supply	\$1,225,415	No	1102 N. 16TH AVENUE	YAKIMA	WA	98902
9 WAFLA	\$807,300	No	975 CARPENTER RD NE SUITE #201	LACEY	WA	98516
10 Wheatland Bank	\$718,958	No	222 N WALL STREET	SPOKANE	WA	99201
11 Maverick Orchards, Inc	\$534,728	No	75 MOUNTAIN VIEW DRIVE	BREWSTER	WA	98812
12 Tiverton Advisors, LLC	\$488,198	No	301 Hillsborough St., Suite 1020	Raleigh	NC	27603
13 H.R. Spinner	\$442,879	No	PO BOX 24541	SEATTLE	WA	98124-0541
14 Sierra Aeronautics,LLC Inc	\$390,963	No	PO BOX 3638	OMAK	WA	98841
15 DEPT OF NATURAL RESOURCES	\$384,999	No	PO BOX 47041	OLYMPIA	WA	98504-7041
16 OKANOGAN CO TREASURER	\$317,913	No	PO BOX 111	OKANOGAN	WA	98840
17 Hi-Lo Orchard, Lp	\$308,962	No	686 CONCONULLY ROAD	OKANOGAN	WA	98840
18 AMERIGAS NATIONAL ACCOUNTS	\$242,383	No	DEPT CH - PO BOX 10525	PALATINE	IL	60055-0525
19 Mid Columbia Forklift, Inc	\$211,175	No	PO BOX 9667	YAKIMA	WA	98909-0667
20 Chamberlin Agriculture	\$136,951	No	590 N. CHAMBERLIN WAY	EAST WENATCHEE	WA	98802
21 Faegre Drinker LLP	\$125,475	No	2200 Wells Fargo Center, 90 S. Seventh Street	Minneapolis	MN	55402
22 Whitley Fuel	\$115,035	No	PO BOX 907	OKANOGAN	WA	98840
23 Epiq Ediscov Solutions Inc	\$107,616	No	777 Third Avenue, 12th Floor	NEW YORK	NY	10017
24 Kelly Knapp	\$89,848	No	608 LAGRANGE RD.	OKANOGAN	WA	98840
25 WEX BANK (EXXON MOBIL)	\$88,883	No	PO BOX 6293	CAROL STREAM	IL	60197-6293
26 OROVILLE-TONASKET IRRIG.	\$64,579	No	PO BOX 1729	OROVILLE	WA	98844
27 Pacific Label	\$62,941	No	5607 SYCAMORE DR	YAKIMA	WA	98901
28 Wash Apple Commission	\$48,056	No	2900 EUCLID AVE.	WENATCHEE	WA	98801
29 Mark Egerton	\$47,924	No	PO BOX 691	OROVILLE	WA	98814
30 Derek & Shellie Barroca	\$47,865	No	1705 PINE CREEK	TONASKET	WA	98855

Interested Parties List**Debtors**

Brewster Heights Packing & Orchards, LP
 Gebbers Farms, Inc.
 Gebbers Orchards, Inc.
 C&M II, LLC
 D&E Storage, LLC
 Eastco, LLC
 GF SA, LLC
 Northco, LLC
 P&G Orchards, LLC
 Repo, LLC
 TJF Properties, LLC
 Westco Orchards, LLC
 Westco Sales, Inc.

Related Entities

6 Gambles LLC
 ADF Helicopters I, LP
 ADF Helicopters, Inc.
 Alta Fresh DBA Chelan Fresh Marketing
 Apple House Warehouse & Storage, Inc.
 Applecore Orchards, LLC
 Brewster 9, LP
 Buckhorn Logging And Chipping
 C&G Orchards LLC
 Cascade Holdings Group, LP
 Cascade Quincy Orchards LLC
 Cass Orchards, LLC
 CFGF Chile, LLC
 CFGF I, SPA
 CFGF II, SPA
 CFGF Investments, Limited
 Chelan Fresh Chile, SPA
 Chelan Fresh International, LLC
 Chelan Fresh Logistics, LLC
 CHISA
 Crane Ranch Holdings, LLC
 Crane Ranch Packing & Orchards, LLC
 Crane Ranch, Inc.
 CWAC Ranch, LLC
 Dimity Orchards LLC
 DMC Detering, LLC
 DMG Holdings, LLC
 Eastco Cherries

Gamble Land & Timber LTD
 Gamble Resort, LP
 Gamble Ridge Lots, LLC
 Gamble Sands Operations, LLC
 GDR Management Inc.
 Gebbers Cattle LTD
 Gebbers Family Group, LLC
 Gebbers Health Insurance
 Gebbers Wick Orchards, LP
 Gebbers-Kenoyer, LLC
 GFI Cherries
 GVL Orchards
 Hawkins & Franco Orchards, LP
 HMJD Orchards, LLC
 HMJD-Collins, LLC
 J & J Enterprises
 JBM Orchards LLC
 JD Cherries, LLC
 JHG Farms, Inc.
 JHG Land, LLC
 JHG Ranch, LLC
 Mac & Cass Nursery, LLC
 Mac & Cass Partnership, LP
 Mac & Ed Orchards, LP
 Mac & Franco Orchards LP
 Mac & Kevin LP
 Mac & Randy Roys LP
 Mac & Tom Fruit LP
 Mac & Travis LLC
 Mac Orchards LLC
 MC-Guelich, LP
 MC-Stennes LLC
 Northco Cherries
 Nueva de Gales, SPA
 O'Connell Drilling and Supplies, LLC
 Ophir Orchards Partnership
 P&G Cherries
 Pioneer Ranch LP
 REPO Cherries
 Snyder Flats, LLC
 Sonya Taylor Orchards, LLC
 South Mission, LLC
 Taylor Orchards Group LP
 The Dobbs Project, LLC

Tinker Lake Management, Inc.
Type 1 Rentals, LLC
VII, LLC
Westco Cherries
Wick Cherries, LLC

Officers & Directors

Robert Warshauer
John H. Gebbers
Craig Barbarosh
Daniel L. Gebbers
Brooke McGuire
Christopher McCarthy

Equityholders

Brian Thompson
Cascade Holdings Group
Cass Gebbers
Cass Gebbers Trust
Daniel L. Gebbers
Danna Guzman Trust
Gebbers Farms, Inc
Gebbers Orchard, Inc
Hawkins B. Gebbers
Jason Thompson
Jody Gebbers
Jody Gebbers Trust
John H. Gebbers
Mac Gebbers
Mac Gebbers Trust
Mac R. Gebbers
MC Operating, LLC
Melanie Sue Wyss
Reba Gebbers
Reba Guzman
Sonya Taylor
Sonya Taylor Trust

Secured Lenders

The Prudential Insurance Company of
America
BMO Bank, N.A.
Happy Valley USA Credit
North Cascades National Bank
Backstop Ag Capital

WE Ag Finance

Litigation Parties & Counsel

International Farming Corporation (IFC)

Significant Vendors

Chamberlin Agriculture
Fruit Packers Supply
Gebbers Farm Services LLC
H.R. Spinner
Highland Refrigeration Inc
Mid Columbia Forklift, Inc
Northwest Wholesale Inc
Nutrien Ag Solutions, Inc.
Van Doren Sales
Wilbur-Ellis Company LLC

Banks

BMO
Wells Fargo Bank, N.A.
Wheatland Bank, Division of Glacier Bank
Washington Trust Bank
The Prudential Insurance Company of
America
Umpqua

Utilities

AgriMACS Inc.
AmeriGas National Accounts
AT&T Mobility
Brewster Flat Domestic Water
Brewster Flat Irrigation District
CenturyLink
Chelan County PUD
City of Brewster
City of Bridgeport
City of Oroville
City of Pateros
Day Wireless Systems, Inc.
Department of Public Works
Dept of Ecology
Douglas County PUD
Ferrellgas Partners, L.P.
Lake Chelan Reclamation District
Local-Tel Communications
Morgan & Son Excavation

Mutual Irrigation
NCI Data.Com Inc
Nespelem Valley Electric
Okanogan County PUD
Okanogan Valley Disposal
Oroville-Tonasket Irrigation
PUD Chelan County
PUD Douglas County
PUD Okanogan County
Starlink
Verizon Business
Verizon Wireless
WasteWise Methow, Inc.
Ziply Fiber
Zippy Disposal Service Inc

Insurance Providers

Agri General Insurance Company
Rain and Hail LLC
The VIP Agency Group LLC
Arch Specialty Ins Co
Ascot Specialty Ins Co
AXIS Surplus Insurance Company
Chubb Bermuda International
Continental Casualty Company
Fidelis Partnership
Kinsale Insurance Company
Lockton
London Companies
Manufacturers Alliance
MSIG Specialty Insurance USA Inc.
Philadelphia Insurance Companies
Starr Indemnity
Starr Surplus Lines Ins Co
Travelers Property Casualty Ins. Co
USI Insurance Services NW

Taxing Authorities

Okanogan County Treasure
Chelan County Treasurer
Douglas County Treasurer
Washington State Department of Licensing
Washington Department of Revenue
Internal Revenue Service
United States Treasury

Chapter 11 Professionals

Katten Muchin Rosenman LLP
Bush Kornfeld LLP
VeroPeak, LLC
Capstone Capital Markets LLC
Stretto, Inc.

Bankruptcy Judges (District of Delaware)

Chief Judge Whitman L. Holt
Judge Frederick P. Corbit

Staff of Office of the United States

Trustee, Region 18

Jonas V. Anderson
Hilary B. Mohr

Regulatory and Governmental Entities

Attorney General of United States
Bureau of Indian Affairs
Eagle Food Registrations, Inc.
Global GAP (Good Agricultural Practices)
Internal Revenue Service
Northwest Horticultural Council
Office of the United States Trustee
Perishable Agricultural Commodities Act
PrimusGFS
Safe Quality Food (SQF) Institute
Social Security Administration
State of Washington Attorney General
U.S. Customs & Border Protection
U.S. Department of Agriculture
U.S. Department of Health & Human
Services
U.S. Department of Justice
U.S. Department of Labor
U.S. Department of Natural Resources
U.S. Environmental Protection Agency
U.S. EPA Region 10 Bankruptcy Contact
U.S. Equal Employment Opportunity
Commission
U.S. Securities & Exchange Commission
U.S. Small Business Administration

Washington Apple Commission
Washington Secretary of State
Washington State Department of Agriculture
Washington State Department of Labor &
Industries
Washington State Department of Revenue
Washington State Division of Child Support
Washington State Employment Security
Department
Washington State Fruit Commission
Washington State Tree Fruit Association

Tom Miller
TOYOTA INDUSTRIES
WAFLA

Notices of Appearance

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Contract Counterparties

AG SOLUTIONS CAPITAL
AMERIGAS PROPANE
AMMONIA COMPLIANCE
AWETA AMERICAS, INC.
Bureau of Indian Affairs
Cascade Holdings
CHEP USA
CHG - Bensing
CINTAS CORPORATION
Department of Natural Resources
Derek & Shellie Barroca
EPIQ eDISCOV SOLUTIONS INC
FAEGRE DRINKER LLP
Gregg Baker
HIGHLAND REFRIGERATION INC
HURST INTERNATIONAL, LLC
IFCO SYSTEMS US, LLC
Kelly Knapp
LARSON GROSS
Leo Lopez
Linda Caswell
Linda Thomason
Mark Egerton
MID COLUMBIA FORKLIFT, INC
Mike Marcellay
PENSER NORTH AMERICA INC.
Penske Leasing and Rental Co.
Penske Truck Leasing Co., L.P.
PUD OKANOGAN CO
SIERRA AERONAUTICS,LLC INC
Snyder Flats
TGW Holdings
Tom Dundas

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6
7 UNITED STATES BANKRUPTCY COURT
8 EASTERN DISTRICT OF WASHINGTON

9 In re

10 BREWSTER HEIGHTS PACKING &
11 ORCHARDS, LP,¹,

12 Debtors.

Chapter 11

Lead Case No. 26-01136-FPC11

[PROPOSED] ORDER APPROVING
EMPLOYMENT OF KATTEN MUCHIN
ROSENMAN LLP

13 This matter having come on regularly for hearing on the application of
14 trustee/debtor-in-possession, the court being fully advised in the premises, no adverse
15 interest being represented and the appointment not being prohibited by Rule 5002:

16 IT IS HEREBY ORDERED

17 1. That the employment of Katten Muchin Rosenman LLP (“Katten”) as
18 counsel for the Debtors in Possession is approved subject to the terms and conditions set
19 forth in the application and 11 U.S.C. §328, effective as of the Petition Date.

20
21 ¹ The debtors are Brewster Heights Packing & Orchards, LP (Case No. 26-01136); Gebbers Farms Inc. (Case
22 No. 26-01140); Gebbers Orchards, Inc. (Case No. 26-01141); C&M II, LLC (Case No. 26-01137); D&E
23 Storage, LLC (Case No. 26-01138); Eastco, LLC (Case No. 26-01139); GF SA, LLC (Case No. 26-01142);
Northco, LLC (Case No. 26-01143); P&G Orchards, LLC (Case No. 26-01144); REPO, LLC (Case No. 26-
01145); TJF Properties, LLC (Case No. 26-01146); Westco Orchards, LLC (Case No. 26-01147); and Westco
Sales, Inc. (Case No. 26-01148).

1 2. That any actual award of compensation is subject to further order of the
2 court, pursuant to 11 U.S.C. §330.

3 // /End of Order/ //

4 Presented by:

5 BUSH KORNFELD LLP

6
7 By _____
Christine M. Tobin-Presser, WSBA #27628
Thomas A. Buford, WSBA # 52969
8 Jason Wax, WSBA #41944
Shane E. Creason, WSBA #63865
9

10 and

11 John E. Mitchell (*Pro Hac Vice* Pending)
Yelena E. Archiyan (*Pro Hac Vice* Pending)
Katten Muchin Rosenman LLP
12 2121 N. Pearl Street, Suite 1100
Dallas, TX 75201
13 Telephone: (214) 765-3600
Emails: john.mitchell@katten.com
14 and yelena.archiyan@katten.com

15 Proposed Attorneys for the Debtors
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