

**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)

(Joint Administration Requested)

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On March 23, 2025, Plenty Unlimited Texas LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”) commenced voluntary petitions for relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 cases because:

- ☒ The debtors have total debt of more than \$10 million;
- ☒ There are more than 50 parties in interest in this case
- ☐ Claims against the debtors are publicly traded;
- ☐ Other (Substantial explanation is required. Attach additional sheets if necessary.)

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 Debtors request of an order granting such other relief as the Court deems appropriate under the circumstances.

Dated: March 23, 2025
Houston, Texas

/s/ Duston K. McFaul

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Certificate of Accuracy

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Duston K. McFaul

Certificate of Service

I certify that on March 23, 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/ Duston K. McFaul

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ORDER GRANTING COMPLEX CASE TREATMENT

These jointly administered cases were filed on March 23, 2025. A Notice of Designation as Complex Case was filed. Based on its review of the initial pleadings, the Court concludes that the complex case designation is appropriate. Accordingly, the Court orders:

1. The Procedures for Complex Cases in the Southern District of Texas apply to these cases. The procedures are posted on the Court's website. Compliance with the procedures is required.

2. The Debtors must give notice of this Order to all parties in interest within seven days. If a party-in-interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.

3. The Bankruptcy Local Rules apply to these cases, subject to the following modifications:

- a. Bankruptcy Local Rule 1001-1(b) does not apply.
- b. Local District Civil Court Rule 83.1 applies.
- c. Appendix A to the Local Rules of the District Court applies.
- d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Dated: _____, 2025

UNITED STATES BANKRUPTCY JUDGE

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.