

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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|--------------------|---|-------------------------|
| In re: |) | Chapter 11 |
| |) | |
| Forward Foods LLC, |) | Case No. 09-10545 (KJC) |
| |) | |
| Debtor. |) | |
| |) | |
| |) | |

NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS

PLEASE TAKE NOTICE that on February 17, 2009, Forward Foods LLC, a Delaware Corporation (the “Debtor”), filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtor continues to operate its business as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtor will present the following pleadings on **FEBRUARY 18, 2009 at 11:30 A.M. (ET)** before the Honorable Kevin J. Carey, United States Chief Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Courtroom No. 5, Wilmington, Delaware 19801:

MOTIONS AND APPLICATIONS

1. Motion for Entry of Interim Order (I) Authorizing Secured Post-Petition Financing, (II) Granting Senior Liens, Junior Liens and Superpriority Administrative Expense Status, (III) Providing Adequate Protection, (IV) Granting Limited Relief from the Automatic Stay, (V) Authorizing the Debtor’s to Enter into Customer Agreements, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [docket no. 9]
2. Motion For Order (A) Authorizing Continued Use Of The Debtor’s Existing Centralized Cash Management System And Existing Bank Accounts; (B) Waiving Certain Operating Guidelines; (C) Terminating Senior Secured Lenders’ Sweep Agreement; And (D) Granting Related Relief[docket no. 10]
3. Debtor’s Motion For Interim And Final Orders (I) Restraining Utilities From Discontinuing, Altering Or Refusing Service; (II) Determining Adequate Assurance Of Payment To Utilities Under 11 U.S.C. § 366; And (III) Establishing A Procedure For Determining Adequate Assurance Of Payment To Utilities [docket no.11]
4. Debtor’s Motion For Order Pursuant To Sections 105(A), 363, 507(A) And 1107 Of The Bankruptcy Code And Federal Rule Of Bankruptcy Procedure 6003,

Authorizing Debtor To Pay Prepetition Wages, Compensation, Employment Benefits And Related Relief [docket no. 12]

5. Motion of Debtor for Order Authorizing, But Not Directing, Debtor to Pay Compensation to Debtor's Brokers, Temporary Employees and Related Relief [docket no. 13]
6. Motion Of The Debtor's For Order Pursuant To Sections 105(A), 363(B), 541, And 507(A)(8) Of The Bankruptcy Code And Fed. R. Bankr. P. 6003 Authorizing (I) Payment Of Certain Prepetition Taxes And (II) Financial Institutions To Process And Cash Related Checks And Transfers [docket no. 14]
7. Motion Of The Debtor For (I) Interim Relief And (II) Final Authority To Continue Financing Arrangement For Insurance Premiums Necessary To Maintain Insurance Coverage [docket no. 15]
8. Application To Retain And To Employ The Garden City Group, Inc., As Claims, Notice, And Balloting Agent [docket no. 16]

Dated: February 17, 2009

/s/ Bradford J. Sandler
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Proposed Counsel to the Debtor