

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
	)	
Forward Foods LLC,	)	Case No. 09-10545 (KJC)
	)	
Debtor.	)	<b>Hearing Date: March 18, 2009 at 4:30 p.m. (ET)</b>
	)	<b>Objection Deadline: March 11, 2009 at 4:00 p.m. (ET)</b>
	)	
	)	<b>Re: Docket No. 18</b>

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**NOTICE OF MOTION**

To: Office of the United States Trustee, the Debtor's Top Twenty Creditors and all parties requesting notice pursuant to Bankruptcy Rule 2002

The Debtor, by and through its undersigned counsel, has filed a Motion for an Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses to Professionals Pursuant to Sections 105(a), 327 and 331 of the Bankruptcy Code (the "Motion").

You are required to file a response, if any, to the attached Motion on or before **March 11, 2009 at 4:00 pm. (ET)**.

At the same time, you must serve a copy of the response upon movant's attorneys:

Bradford J. Sandler, Esq.  
Benesch, Friedlander, Coplan & Aronoff  
LLP  
222 Delaware Ave., Suite 801  
Wilmington, DE 19801

William I. Kohn, Esq.  
Kari Coniglio, Esq.  
Benesch, Friedlander, Coplan & Aronoff,  
LLP  
200 Public Square, St. 2300  
Cleveland, OH 44114-2378

A HEARING ON THIS MATTER WILL BE HELD ON **MARCH 18, 2009 AT 4:30 P.M. (ET)** BEFORE THE HONORABLE KEVIN J. CAREY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, WILMINGTON, DELAWARE, COURT ROOM NO. 5.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT  
MAY GRANT THE RELIEF REQUESTED WITHOUT FURTHER NOTICE OR HEARING.

February 19, 2009

BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP

/s/ Bradford J. Sandler  
Bradford J. Sandler, Esq. (No. 4142)  
222 Delaware Ave., Suite 801  
Wilmington, DE 19801  
302-442-7010  
302-442-7012  
[bsandler@beneschlaw.com](mailto:bsandler@beneschlaw.com)

Proposed Counsel to the Debtor and Debtor  
In Possession

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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

**CERTIFICATION OF SERVICE**

I, Bradford J. Sandler, Esquire, hereby certify that on February 19, 2009 a true and correct copy of the foregoing document was served via Electronic Notification, Hand Delivery or First Class Mail upon the parties on the attached list.

Dated: February 19, 2009

Benesch, Friedlander, Coplan & Aronoff LLP

/s/ Bradford J. Sandler  
Bradford J. Sandler, Esquire (No. 4142)  
222 Delaware Ave., Suite 801  
Wilmington, DE 19801  
302 442 7010  
302-442-7012  
[bsandler@beneschlaw.com](mailto:bsandler@beneschlaw.com)

Proposed Counsel to Debtor

Forward Foods  
2002 Service List

<p>Forward Foods LLC Attn: Nancy Huber 2542 Business Parkway, Unit 2 Minden, NV 89423 Phone: 775-267-9014 xt. 220 Fax: 775-267-9057 (Debtor) <b>(First Class Mail)</b></p>	<p>U.S. Trustee: 844 King Street Suite 2207 Lockbox 35 Wilmington, DE 19801 Phone: 302-573-6491 Fax: 302-573-6497 (UST) <b>(Hand Delivery)</b></p>	<p>CH Robinson Worldwide PO Box 9121 Minneapolis, MN 55480- 9121 T 952-937-8500 F 952-937-7840 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Gelita USA PO Box 1796 Sioux City, IA 51102 T 712-943-5516 F 712-943-3372 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Hire Dynamics LLC PO Box 890858 Charlotte, NC 28289-0858 T 678-482-8041 F 678-482-8799 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Firmenich Inc. PO Box 7247-8502 Philadelphia, PA 19170- 8502 T 609-919-0652 T 609-452-1000 F 609-452-6077 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Malnove Incorporated of Utah 13434 F. Street Omaha, NE 68137 T 402-330-1100 (Toll-free 800-228-9877) F 402-330-2941 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Fonterra USA Inc. 100 Corporate Center Drive, Suite 101 Camp Hill, PA 17011-1758 T 847-928-1600 F 847-928-1606 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Clasen Quality Coatings, Inc. JP Morgan Chase Lockbox Processing Box 681072 Madison, WI 53718 T 608-467-1130 (Toll-free 877-459-4500) F 608-249-4573 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Golden Select Foods Company 5743 Smithway Street, #305 City of Commerce, CA 90040 T 323-721-1882 F 323-721-4526 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Farbest-Tallman Foods Corp. 160 Summit Avenue Montvale, NJ 07645 T 201-573-4900 F 201-573-0404 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Premium Ingredients, Ltd. 285 E. Fullerton Avenue Carol Stream, IL 60188 T 630-868-0300 F 630-868-0310 (Top Twenty Creditor) <b>(First Class Mail)</b></p>

<p>St. Louis Lithographing Co. 6880 Heege Road St. Louis, MO 63123 T 314-352-1300 F 314-352-1659 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>American Casein Company 109 Elbow Lane Burlington, NJ 08016 T 609-387-3130 F 609-387-7204 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>The Pantry, Inc. PO Box 601819 Charlotte, NC 28260-1819 T 919-774-6700 F 919-774-3329 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Crossroad Ingredients LLC 271 Route 46W, Suite H206 Fairfield, NJ 07004 T 973-244-0899 F 973-244-0809 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Osio International, Inc. 2550 E. Cerritos Avenue Anaheim, CA 92806 T 714-935-9700 F 714-935-9911 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Univar USA Inc. File 56019 Los Angeles, CA 90074-6019 T 425-889-3400 F 425-889-4100 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Constantine Cannon 450 Lexington Avenue New York, NY 10017 T 212-350-2700 F 212-350-2701 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Emigrant Capital Corp. Attn: Ed Burns and Ken Walters 6 East 43<sup>rd</sup> Street, 8<sup>th</sup> Floor New York, NY 10017 T 212-850-4869 F 212-850-3394 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Comerica Bank 500 Woodward Avenue One Detroit Center, 5<sup>th</sup> Floor Detroit, MI 48226 (Top Twenty Creditor) <b>(First Class Mail)</b></p>
<p>Citibank, Commercial Banking Group Attn: Christopher Myers 2121 Palomar Airport Road Suite 150 Carlsbad, CA 92011 (Top Twenty Creditor) <b>(First Class Mail)</b></p>	<p>Bernard D. Bollinger, Jr., Esq. Buchalter Nemer 1000 Wilshire Blvd., Suite 1500 Los Angeles, CA 90017-2457 T 213-891-5009 F 213-896-0400 <a href="mailto:bbollinger@buchalter.com">bbollinger@buchalter.com</a> <a href="mailto:ifs_filing@buchalter.com">ifs_filing@buchalter.com</a> (CIT) <b>(First Class Mail)</b></p>	<p>Debra A. Riley, Esq. Allen Matkins Leck Gamble Mallory &amp; Natsis, LLP 501 West Broadway, 15<sup>th</sup> Floor San Diego, CA 92101 T 619-235-1520 F 619-233-1158 <a href="mailto:driley@allenmatkins.com">driley@allenmatkins.com</a> (Next Proteins) <b>(First Class Mail)</b></p>

<p>Michael G. Busenkell, Esq.  Womble Carlyle Sandridge  &amp; Rice, PLLC  222 Delaware Avenue,  Suite 1501  P.O. Box 2031  Wilmington, DE 19899  T 302-252-4324  F 302-252-4330  mbusenkell@wcsr.com  (Next Proteins)  <b>(Hand Delivery)</b></p>	<p>Kurt F. Gwynne, Esq.  Kimberley E. C. Lawson,  Esq.  Reed Smith LLP  1201 N. Market Street,  Suite 1500  Wilmington, DE 19801  T 302-778-7500  F 302-778-7575  <a href="mailto:kgwynne@reedsmith.com">kgwynne@reedsmith.com</a>  <a href="mailto:klawson@reedsmith.com">klawson@reedsmith.com</a>  (CIT)  <b>(Hand Delivery)</b></p>	<p>William I. Kohn, Esq.  Kari Coniglio, Esq.  Benesch, Friedlander,  Coplan &amp; Aronoff, LLP  200 Public Square, St. 2300  Cleveland, OH 44114-2378  T 216-363-4500  F 216-363-4588  <a href="mailto:wkohn@beneschlaw.com">wkohn@beneschlaw.com</a>  <a href="mailto:kconiglio@beneschlaw.com">kconiglio@beneschlaw.com</a>  (Debtor's Counsel)  <b>(First Class Mail)</b></p>
<p>Emigrant Capital Corp.,  Ed Burns, Esq.  Ken Walters, Esq.  6 E. 43<sup>rd</sup>  New York, NY 10017  <b>(First Class Mail)</b></p>	<p>Comerica Bank  David J. Nowaczewski,  Esq.  1901 St. Antoine Street, 6<sup>th</sup>  Floor at Ford Field  Detroit, MI 48226  <b>(First Class Mail)</b></p>	