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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re: Del Monte Foods Corporation II Inc., *et al.*,[1] Debtor. Tax I.D. No. 99-4101894	Chapter 11 Case No. 25-16984 (MBK)
In re: Del Monte Foods Holding Limited Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 25-16994 (MBK)
In re: Del Monte Foods Holdings II Inc., Debtor. Tax I.D. No. 82-4809488	Chapter 11 Case No. 25-16991 (MBK)

[1] The last four digits of Debtor Del Monte Foods Corporation II Inc.'s tax identification number are 1894. A complete list of the Debtors in these Chapter 11 Cases and their respective tax identification numbers may be obtained on the website of the Debtors' proposed claims and noticing agent, at https://cases.stretto.com/DelMonteFoods. The location of the Debtor Del Monte Foods Corporation II Inc.'s principal place of business and the Debtors' service address is 205 North Wiget Lane, Walnut Creek, California 94598.

In re: Del Monte Foods Holdings, Inc., Debtor. Tax I.D. No. 47-1346441	Chapter 11 Case No. 25-16993 (MBK)
In re: Del Monte Foods, Inc., Debtor. Tax I.D. No. 46-3991361	Chapter 11 Case No. 25-16995 (MBK)
In re: Sager Creek Foods, Inc., Debtor. Tax I.D. No. 47-3284675	Chapter 11 Case No. 25-17005(MBK)
In re: S & W Fine Foods, Inc., Debtor. Tax I.D. No. 94-3394109	Chapter 11 Case No. 25-17004 (MBK)
In re: College Inn Foods, Debtor. Tax I.D. No. 94-6068554	Chapter 11 Case No. 25-16988 (MBK)
In re: Contadina Foods, Inc., Debtor. Tax I.D. No. 94-3296039	Chapter 11 Case No. 25-16989 (MBK)

In re: Hi Continental Corporation, Debtor. Tax I.D. No. 94-1710295	Chapter 11 Case No. 25-17000 (MBK)
In re: Joyba, Inc., Debtor. Tax I.D. No. 93-2419475	Chapter 11 Case No. 25-17001 (MBK)
In re: Kitchen Basics, Inc., Debtor. Tax I.D. No. 93-2394100	Chapter 11 Case No. 25-17002 (MBK)
In re: Green Thumb Foods, Debtor. Tax I.D. No. 93-2447607	Chapter 11 Case No. 25-16999 (MBK)
In re: Del Monte Ventures, LLC, Debtor. Tax I.D. No. 35-2626116	Chapter 11 Case No. 25-16998 (MBK)
In re: Del Monte Chilled Fruit Snacks, LLC, Debtor. Tax I.D. No. 32-0576651	Chapter 11 Case No. 25-16990 (MBK)

In re: DM Intermediate Corporation, Debtor. Tax I.D. No. 99-4125030	Chapter 11 Case No. 25-16987 (MBK)
In re: DM Intermediate II Corporation,, Debtor. Tax I.D. No. 99-4172812	Chapter 11 Case No. 25-16986 (MBK)
In re: Del Monte Mexico Holdings LLC, Debtor. Tax I.D. No. 52-9118525	Chapter 11 Case No. 25-16996 (MBK)

DEBTORS' MOTION FOR AN ORDER AUTHORIZING (I) THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

Del Monte Foods Corporation II Inc. and its affiliated debtors and debtors in possession (collectively, the "**Debtors**") in the above-captioned Chapter 11 Cases respectfully state the following in support of this motion (the "**Motion**"), and rely upon and incorporate by reference the *Declaration of Jonathan Goulding, as Chief Restructuring Officer, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* (the "**First Day Declaration**") filed concurrently herewith[2]:

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

RELIEF REQUESTED

1. The Debtors seek entry of an Order, substantially in the form annexed hereto as **Exhibit A** (the "**Proposed Order**"), authorizing (i) the joint administration of the Debtors' Chapter 11 Cases and the consolidation thereof for procedural purposes only and (ii) granting related relief.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the New Jersey (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334(b) and the *Standing Order of Reference to the Bankruptcy Court Under Title 11*, entered on July 23, 1984, and amended on June 6, 2025 (Bumb, C.J.) (the "**Standing Order**").

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Debtors consent to the entry of a final order by the Court in connection with this Motion 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.

4. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 342(c)(1) of title 11 of the United States Code (the "**Bankruptcy Code**"), Rules 1015(b) and 2002 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rules 1002-2(c) and 9013-5 of the Local Bankruptcy Rules for the District of New Jersey (the "**Local Rules**").

BACKGROUND

A. General Background

6. On July 1, 2025 (the "**Petition Date**"), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the "**Chapter 11 Cases**"). Pursuant

to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors continue to operate their business and manage their financial affairs as debtors in possession.

7. As of the date hereof, no request for the appointment of a trustee or examiner has been made, nor has any statutory committee been appointed or designated, in the Chapter 11 Cases.

8. Information regarding the Debtors' history and business operations, capital structure and primary secured indebtedness, and the events leading up to the commencement of the Chapter 11 Cases can be found in the First Day Declaration, which is incorporated herein by reference.

B. Specific Relief Requested

9. By this Motion, the Debtors request entry of an order, substantially in the form of the Proposed Order, directing the joint administration of these Chapter 11 Cases and the consolidation thereof for procedural purposes only, and waiving the notice requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n).

10. The Debtors also request that the Clerk of the Court maintain one file and one docket for all of the Debtors' Chapter 11 Cases, under the case assigned to Del Monte Foods Corporation II Inc. (the "**Lead Case**"), and that the official caption (the "**Consolidated Caption**") to be used by all parties in all pleadings in the jointly administered cases be as follows:

In re:	Chapter 11
Del Monte Foods Corporation II Inc., *et al.*,[1]	Case No. 25-16984 (MBK)
Debtors.	(Jointly Administered)

1 The last four digits of Debtor Del Monte Foods Corporation II Inc.'s tax identification number are 1894. A complete list of the Debtors in these Chapter 11 Cases and their respective tax identification numbers may be obtained on the website of the Debtors' proposed claims and noticing agent, at https://cases.stretto.com/DelMonteFoods. The location of the Debtor Del Monte Foods Corporation II Inc.'s

principal place of business and the Debtors' service address is 205 North Wiget Lane, Walnut Creek, California 94598.

11. The Debtors also seek the Court's direction that a notation be entered on the docket in each Debtor's chapter 11 cases to reflect the joint administration of these cases.

BASIS FOR RELIEF

12. Pursuant to Bankruptcy Rule 1015(b), if two or more petitions are pending in the same court by or against a debtor and an affiliate, "the [C]ourt may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b). Here, in these Chapter 11 Cases, the eighteen (18) Debtors are "affiliates," as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Court may grant the relief requested herein.

13. As set forth in the First Day Declaration, the Debtors' operations are interconnected and co-dependent, and share many of the same creditors and other parties in interest. Many, if not virtually all, of the motions, applications, hearings and orders that will arise in these Chapter 11 Cases will jointly affect all of the Debtors. Jointly administering the cases will avoid unnecessary expenses by eliminating the need for duplicative filings, objections, notices, and hearings. Additionally, joint administration will reduce the administrative burdens imposed on the Court and its noticing agent, as the Clerk of the Court will be permitted to utilize a single docket for the Chapter 11 Cases and to combine notices to creditors and other parties in interest in the Debtors' respective cases. Jointly administering the cases will also enable the United States Trustee for the District of New Jersey (the "**U.S. Trustee**") and all other parties in interest to easily and efficiently stay apprised of all matters before the Court.

14. Jointly administering the estates here will not prejudice any party in interest or harm the Debtors' creditor constituencies. The relief sought here is procedural and will not affect the

substantive rights of any party in interest given that creditors will retain their ability to file their claim against a particular estate.

15. The entry of joint administration orders for procedural purposes only is non-controversial and is quite common in this District. *See, e.g., In re New Rite Aid LLC*, Case No. 25-14861 (MBK) (Bankr. D.N.J. May 7, 2025) (granting joint administration) [Dkt. No. 122]; *In re Sam Ash Music Corp.*, Case No. 24-14727 (SLM) (Bankr. D.N.J. May 10, 2024) [Dkt. No. 39] (same); *In re Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG) (Bankr. D.N.J. Mar. 1, 2024) [Dkt. No. 64]; *In re Invitae Corp.*, Case No. 24-11362 (MBK) (Bankr. D.N.J. Feb. 16, 2024) [Dkt. No. 54] (same); *In re Careismatic Brands, LLC*, Case No. 24-10561 (VFP) (Bankr. D.N.J. Jan. 24, 2024) [Dkt. No. 57] (same); *In re WeWork Inc.*, Case No. 23-19865 (JKS) (Bankr. D.N.J. Jan. 8, 2024) [Dkt. No. 1116] (same).

16. Additionally, use of the Consolidated Caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n). 11 U.S.C. § 342(c)(1), Fed. R. Bankr. P. 2002(n).

17. Finally, this Motion seeks only administrative and not substantive consolidation of the Debtors' estates. Therefore, the rights of parties in interest will not be prejudiced. Instead, parties in interest will benefit from the reduced costs associated with a jointly administered estate. For these reasons, the Debtors submit that the relief requested is in the best interests of the Debtors, their estates and creditors, and should be granted.

REQUEST FOR WAIVER OF MEMORANDUM OF LAW

18. The Debtors respectfully request the Court waive the requirements to file a separate memorandum of law pursuant to Local Rule 9013-1(a)(3), as the legal grounds upon which the Debtors rely is set forth in this Motion and does not raise any novel issues of law.

NOTICE OF MOTION

19. Notice of the Motion will be given to (i) the U.S. Trustee for the District of New Jersey; (ii) counsel to the Prepetition ABL Agent; (iii) counsel to the Ad Hoc Term Lender Group; (iv) counsel to the Super-Senior Agent; (v) counsel to the DIP Agents; (vi) the parties included on the Debtors' consolidated list of thirty (30) largest unsecured creditors; (vii) the United States Attorney's Office for the District of New Jersey; (viii) the attorneys general for all states in which the Debtors conduct business; (ix) the United States Department of Justice; (x) the Internal Revenue Service; and (xi) all parties requesting notice pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-5. In light of the nature of the relief requested herein, the Debtors submit that due and proper notice has been given under the circumstances, and that no other or further notice is necessary.

CONCLUSION

WHEREFORE, the Debtors respectively request that the Court grant the relief requested herein and such other and further relief as the Court may deem just and appropriate under the circumstances.

Dated: July 1, 2025

/s/ Michael D. Sirota
Michael D. Sirota

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**Pending Admission Pro Hac Vice*

Proposed Co-Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

Caption in Compliance with D.N.J. LBR 9004-1(b)

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
In re: Del Monte Foods Corporation II Inc., *et al.*,[1] Debtors. Tax I.D. No. 99-4101894	Chapter 11 Case No. 25-16984 (MBK) (Joint Administration Requested)
In re: Del Monte Foods Holding Limited, Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 25-16994 (MBK) (Joint Administration Requested)
In re: Del Monte Foods Holdings II Inc., Debtor. Tax I.D. No. 82-4809488	Chapter 11 Case No. 25-16991 (MBK) (Joint Administration Requested)
In re: Del Monte Foods Holdings, Inc., Debtor. Tax I.D. No. 47-1346441	Chapter 11 Case No. 25-16993 (MBK) (Joint Administration Requested)

[1] The last four digits of Debtor Del Monte Foods Corporation II Inc.'s tax identification number are 1894. A complete list of the Debtors in these Chapter 11 Cases and their respective tax identification numbers may be obtained on the website of the Debtors' proposed claims and noticing agent, at https://cases.stretto.com/DelMonteFoods. The location of the Debtor Del Monte Foods Corporation II Inc.'s principal place of business and the Debtors' service address is 205 North Wiget Lane, Walnut Creek, California 94598.

In re: Del Monte Foods, Inc., Debtor. Tax I.D. No. 46-3991361	Chapter 11 Case No. 25-16995 (MBK) (Joint Administration Requested)
In re: Sager Creek Foods, Inc., Debtor. Tax I.D. No. 47-3284675	Chapter 11 Case No. 25-17005 (MBK) (Joint Administration Requested)
In re: S & W Fine Foods, Inc., Debtor. Tax I.D. No. 94-3394109	Chapter 11 Case No. 25-17004 (MBK) (Joint Administration Requested)
In re: College Inn Foods, Debtor. Tax I.D. No. 94-6068554	Chapter 11 Case No. 25-16988 (MBK) (Joint Administration Requested)
In re: Contadina Foods, Inc., Debtor. Tax I.D. No. 94-3296039	Chapter 11 Case No. 25-16989 (MBK) (Joint Administration Requested)
In re: Hi Continental Corporation, Debtor. Tax I.D. No. 94-1710295	Chapter 11 Case No. 25-17000 (MBK) (Joint Administration Requested)

In re: Joyba, Inc., Debtor. Tax I.D. No. 93-2419475	Chapter 11 Case No. 25-17001 (MBK) (Joint Administration Requested)
In re: Kitchen Basics, Inc., Debtor. Tax I.D. No. 93-2394100	Chapter 11 Case No. 25-17002 (MBK) (Joint Administration Requested)
In re: Green Thumb Foods, Debtor. Tax I.D. No. 93-2447607	Chapter 11 Case No. 25-16999 (MBK) (Joint Administration Requested)
In re: Del Monte Ventures, LLC, Debtor. Tax I.D. No. 35-2626116	Chapter 11 Case No. 25-16998 (MBK) (Joint Administration Requested)
In re: Del Monte Chilled Fruit Snacks, LLC, Debtor. Tax I.D. No. 32-0576651	Chapter 11 Case No. 25-16990 (MBK) (Joint Administration Requested)
In re: DM Intermediate Corporation, Debtor. Tax I.D. No. 99-4125030	Chapter 11 Case No. 25-16987 (MBK) (Joint Administration Requested)
In re: DM Intermediate II Corporation, Debtor. Tax I.D. No. 99-4172812	Chapter 11 Case No. 25-16986 (MBK) (Joint Administration Requested)

In re: Del Monte Mexico Holdings LLC, Debtor. Tax I.D. No. 52-9118525	Chapter 11 Case No. 25-16996 (MBK) (Joint Administration Requested)

ORDER AUTHORIZING (I) THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered three (3) through six (6), is **ORDERED.**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Co-Counsel to the Debtors and Debtors in Possession

Upon the motion (the "'**Motion**")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for, among other things, entry of an order (this "**Order**"), authorizing (i) the joint administration of the Debtors' Chapter 11 Cases and the consolidation thereof for procedural purposes only and (ii) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter in accordance with 28 U.S.C. §§ 157 and 1334 and the Standing Order; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' 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 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 the Court after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Debtors' Chapter 11 Cases shall be consolidated for procedural purposes only and shall be jointly administered in accordance with the provisions of Bankruptcy Rule 1015.

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. The Clerk of the Court shall maintain one file and one docket for all of the Debtors' Chapter 11 Cases, which file and docket shall the Chapter 11 Cases of Del Monte Foods Corporation II Inc., Case No. 25-16984 (MBK).

4. All pleadings in the Debtors' Chapter 11 Cases shall bear a consolidated caption in the following form:

In re:	Chapter 11
Del Monte Foods Corporation II Inc., *et al.*,[1]	Case No. 25-16984 (MBK)
Debtors.	(Jointly Administered)

[1] The last four digits of Debtor Del Monte Foods Corporation II Inc.'s tax identification number are 1894. A complete list of the Debtors in these Chapter 11 Cases and their respective tax identification numbers may be obtained on the website of the Debtors' proposed claims and noticing agent, at https://cases.stretto.com/DelMonteFoods. The location of the Debtor Del Monte Foods Corporation II Inc.'s principal place of business and the Debtors' service address is 205 North Wiget Lane, Walnut Creek, California 94598.

5. The foregoing caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code.

6. All original pleadings shall be captioned as indicated in paragraph 4 of this Order, and the Clerk of the Court shall make docket entries in the dockets of each of the Chapter 11 Cases to reflect the joint administration of the cases. The Clerk shall file a copy of this Order in the Lead Case and each of the affiliated Debtor cases.

7. Nothing in the Motion or this Order is intended or shall be deemed or otherwise construed as directing or otherwise effecting a substantive consolidation of the Debtors' estates. This Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

8. All lists, schedules and statements shall be filed and docketed in the specific case to which they are applicable.

9. Any party in interest may request joint hearings on matters pending in any of the Chapter 11 Cases.

10. If pleadings, papers or documents have been filed in any of the above-captioned cases other than the Lead Case prior to the entry of this Order, and those matters have not yet been heard and decided, the party who filed the pleading, paper, or document shall (i) refile the pleadings, paper or document in the Lead Case within three (3) business days of the entry of this Order, (ii) set the pleading, paper or document for hearing before the judge assigned to the Lead Case and (iii) notice the hearing to all appropriate parties.

11. The Debtors shall file individual monthly operating reports for each Debtor and such reports shall be docketed in the Lead Case.

12. The requirement set forth in Local Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived by entry of this Order.

13. Any party may move for modification of this Order in accordance with Local Rule 9013-5(e).

14. This Order shall be effective immediately upon entry.

15. A true copy of this Order shall be served on all required parties pursuant to Local Rule 9013-5(f).

16. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

17. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.