

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SALADWORKS, LLC,¹

Debtor.

Chapter 11

Case No. 15-10327 (LSS)

**NOTICE OF DATES BY WHICH PARTIES MUST FILE
PROOFS OF CLAIM AND PROOFS OF INTEREST AND PROCEDURES
FOR FILING PROOFS OF CLAIM AND PROOFS OF INTEREST,
INCLUDING CLAIMS UNDER 11 U.S.C. § 503(B)(9), AGAINST THE DEBTOR**

PLEASE TAKE NOTICE THAT Saladworks, LLC as debtor and debtor-in-possession (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”) on **February 17, 2015** (the “Petition Date”).

PLEASE TAKE FURTHER NOTICE THAT on **March 31, 2015**, the Debtor filed the *Motion of the Debtor for Entry of an Order (A) Establishing Bar Dates for Filing Proofs of Claim, (Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code) and Proofs of Interest; (B) Approving the Form and Manner for Filing Proofs of Claim and Proofs of Interest; and (C) Approving Notice Thereof* [Docket No. 135] (the “Bar Date Motion”). On April 22, 2015, the Court entered an order approving the Bar Date Motion [Docket No. 177] (the “Bar Date Order”) and establishing certain dates (collectively, the “Bar Dates,” and individually, a “Bar Date”) by which parties holding claims against or asserting interests in the Debtor that arose (or are deemed to have arisen) before the Petition Date must file proofs of claim and proofs of interest against the Debtor. Each date is expressly set forth below.

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU MAY BE
HOLDING A CLAIM AGAINST OR INTEREST IN THE DEBTOR IN THE ABOVE-
CAPTIONED CHAPTER 11 CASE. THEREFORE, YOU SHOULD READ THIS NOTICE
CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN
ATTORNEY, YOU MAY WISH TO CONSULT ONE.

Background to the Debtor’s Chapter 11 Case

A. General Information about the Debtor’s Case. No request for the appointment of a trustee or examiner has been made in this Chapter 11 Case.²

¹ The last four digits of the Debtor’s tax identification number are (7282). The Debtor’s corporate office and the mailing address is 161 Washington Street, Suite 300, Conshohocken, PA 19428.

² Except as otherwise defined herein or in the Motion, all terms used in this Bar Date Order that are specifically defined in the Bankruptcy Code shall have the meanings ascribed to such terms in the Bankruptcy Code. In particular, as used herein: (a) the term “claim” has the meaning given to it in Bankruptcy Code section 101(5); (b)

B. Access to Claim Forms and Additional Information. If you have any questions regarding the claims process and/or if you wish to obtain a copy of the Bar Date Motion, Bar Date Order (which contains a more detailed description of the requirements for filing proofs of claim and proofs of interest), a Claim Form, Interest Form, Administrative Claim Form or related documents (and/or any other pleadings filed in the Debtor's Chapter 11 Case) you may do so by contacting the Debtor's court-appointed claims and noticing agent UpShot Services LLC ("UpShot") in writing, at Saladworks LLC Claims Processing, c/o UpShot Services LLC, 7808 Cherry Creek South Drive, Suite 112, Denver, CO 80231 or visiting the Debtor's case website <http://www.upshotservices.com/saladworks> or the Bankruptcy Court's website <http://www.deb.uscourts.gov>. Copies of the Bar Date Order also may be examined between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday, excluding federal holidays, at the Office of the Clerk of the Bankruptcy Court (the "Clerk"), 824 N. Market St., 3rd Floor, Wilmington, Delaware 19801. If you have any questions concerning the filing or processing of claims, you may contact UpShot toll free (855)-812-6112 or via electronic mail at saladworksinfo@upshotservices.com.

Schedules of Assets and Liabilities

The Debtor filed its statement of financial affairs and schedules of assets and liabilities with the Court on March 19, 2015 (as amended or modified and together as, the "Schedules and Statements"). The Debtor's Schedules and Statements and the Bar Date Order may be examined and inspected by interested parties during regular business hours at (a) the offices of Landis Rath & Cobb LLP, 919 N. Market St., Suite 1800, Wilmington, DE 19801 or during posted hours at (b) the Clerk of the Bankruptcy Court, United States Bankruptcy Court, District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. The Debtor's Schedules and Statements and the Bar Date Order are also available online, free of charge, at <http://www.upshotservices.com/saladworks>.

Bar Dates Approved by the Court

The Court has established the following Bar Dates as those dates by which parties holding claims against or asserting interests in the Debtor that arose (or that are deemed to have arisen) before the Petition Date must file proofs of claim or proofs of interest so that they are **actually received** by the Claims Agent:

General Bar Date: **May 29, 2015 at 4:00 p.m. prevailing Eastern Time**, is the date by which all entities (which includes, individual persons, estates, trusts, partnerships and corporations, among others) must file proofs of claim and proofs of interest, including claims under Bankruptcy Code section 503(b)(9) and interests related to equity interests.

Governmental Bar Date: **August 17, 2015 at 4:00 p.m. prevailing Eastern Time**, is

the term "entity" has the meaning given to it in Bankruptcy Code section 101(15); (c) the term "governmental unit" has the meaning given to it in Bankruptcy Code section 101(27); and (d) the term "person" has the meaning given to it in Bankruptcy Code section 101(41).

the date by which all governmental units holding claims (whether secured, unsecured priority or unsecured non-priority) must file proofs of claim, including claims for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtor was a party.

Parties Required To File Proofs of Claim or Proofs of Interest

- A. Definition of Claim.** Under Bankruptcy Code section 101(5) and as used herein, the word “claim” means: (i) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (ii) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.
- B. Parties Who Must File Proofs of Claim and Proofs of Interest.** Except as otherwise set forth herein, the following persons or entities holding claims against or asserting interests in the Debtor that arose (or are deemed to have arisen) before the Petition Date must file proofs of claim or proofs of interest, as applicable, on or before the applicable Bar Date:
- a) any person or entity whose claim or interest against the Debtor is not listed in the Debtor’s Schedules and Statements or is listed on such Schedules and Statements as contingent, unliquidated, or disputed;
 - b) any person or entity asserting an equity interest in the Debtor;
 - c) any person or entity who desires to participate in the Chapter 11 Case or share in any distribution in the Chapter 11 Case;
 - d) any holders of claims allowable as administrative expenses of the Debtor’s estate pursuant to Bankruptcy Code section 503(b)(9); or
 - e) any person or entity who believes that its claim or interest is improperly classified in the Debtor’s Schedules and Statements or is listed in an incorrect amount and who desires to have its claim or interest allowed in a different classification or amount.
- C. Parties Who Do Not Need To File Proofs of Claim or Proofs of Interest.** Certain parties are not required to file proofs of claim or proofs of interest. The Court may, however, enter one or more separate orders at a later time requiring holders of claims or interests to file proofs of claim or proofs of interest for some kinds of the following claims and interests and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following persons or entities holding claims or interests that would otherwise be subject to the applicable Bar Date need not file proofs of claim or proofs of interest:

- (a) any person or entity that already has filed a signed proof of claim against the Debtor with the Debtor's Claims Agent (as defined below) in a form substantially similar to Official Form 10;
- (b) any person or entity whose claim or interest is listed on the Debtor's Schedules and Statements, but only if: (i) such claim or interest is not scheduled as contingent, unliquidated or disputed; (ii) the holder of the claim or interest does not disagree with the amount, nature and priority of the claim or interest as set forth on the Debtor's Schedules and Statements; and (iii) the holder of the claim or interest does not dispute that the claim or interest is an obligation of the Debtor as set forth in the Schedules and Statements;
- (c) a holder of a claim or interest that has been paid in full by the Debtor or any other party;
- (d) a holder of a claim for which a specific deadline to file a claim previously has been fixed by the Court; or
- (e) a current employee of the Debtor, if an order of this Court authorized the Debtor to honor such claim in the ordinary course of business as a wage, commission or benefit; provided, however, that a current or former employee must submit a proof of claim by the General Bar Date for all other claims, including claims for deferred compensation, wrongful termination, discrimination, harassment, hostile work environment, retaliation, claims covered by the Debtor's workers' compensation insurance, or any other litigation or pre-litigation claim.

Instructions for Filing Proofs of Claim and Proofs of Interest

- A. Contents of Proofs of Claim and Proofs of Interest.** Each proof of claim and proof of interest must (i) be written in English; (ii) include a claim or interest amount denominated in United States dollars (and to the extent such claim or interest is converted to United States dollars, the conversion rate used); (iii) conform substantially with Official Form 10 or the Interest Form; (iv) be signed by the holder of the claim or interest or by an authorized agent or legal representative of the holder of the claim or interest; and (v) be an original proof of claim or proof of interest (photocopies, telecopies or facsimiles will **not** be accepted).
- B. Supporting Documentation.** Each proof of claim and proof of interest must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d) (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available; provided, however, that a proof of claim or proof of interest may only be filed without supporting documentation upon the prior written consent of the Debtor's counsel; provided further, however, that any creditor or interest holder that received such written consent shall be required to

transmit such writings to the Debtor's counsel upon request no later than 14 days from the date of such request.

- C. Section 503(b)(9) Claims.** If you are filing a claim under Bankruptcy Code section 503(b)(9), you must indicate (in Box 6 of Official Form 10 if you are using that form) the amount of the claim that arises under Bankruptcy Code section 503(b)(9). For each claim under Bankruptcy Code section 503(b)(9), you must attach to the Claim Form a supplemental statement setting forth with specificity: (i) the date of shipment of the goods that you contend the Debtor received in the twenty (20) days before the Petition Date; (ii) the date, place, and method (including carrier name) of delivery of the goods you contend the Debtor received in the twenty (20) days before the Petition Date; (iii) the value of the goods you contend the Debtor received in the twenty (20) days before the Petition Date; and (iv) whether you timely made a demand to reclaim such goods under Bankruptcy Code section 546(c), including any documentation identifying such demand.
- D. Timely Service.** Each Claim Form, Interest Form and Administrative Claim Form, including supporting documentation, must be submitted: (i) electronically, on or before the Bar Date, by completing the applicable form that can be accessed at the Claims Agent's website <http://www.upshotservices.com/saladworks> or (ii) by United States mail or other hand delivery system, so as to be **actually received** by the Claims Agent on or before the Bar Date at the following address:

Saladworks LLC Claims Processing
c/o UpShot Services LLC
7808 Cherry Creek South Drive, Suite 112
Denver, CO 80231

EXCEPT AS EXPRESSLY PERMITTED ABOVE, PROOF OF CLAIM FORMS AND PROOF OF INTEREST FORMS OTHERWISE SUBMITTED BY FACSIMILE, TELECOPY, ELECTRONIC MAIL OR OTHER FORM OF ELECTRONIC SUBMISSION WILL NOT BE ACCEPTED.

Receipt of Service. Holders of claims or interests wishing to receive acknowledgment that their proofs of claim or proofs of interest were received by the Claims Agent must submit (i) a copy of the proof of claim or proof of interest and (ii) a self-addressed, stamped envelope.

Consequences of Failing to Timely File Your Proof of Claim or Proof of Interest

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you or any party or entity who is required, but fails, to file a proof of claim or proof of interest in accordance with the Bar Date Order on or before the applicable Bar Date, please be advised that **YOU SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION.**

Amendments to the Debtor's Schedules

- A. Amendments to Schedules.** In the event the Debtor amends its Schedules and Statements after the date of this notice, the Debtor will provide holders of claims that are affected by the amendment notice of the amendment, and such parties will be given an opportunity to file proofs of claim and proofs of interest before a new deadline that will be specified in that future notice.
- B. Amended Schedules Bar Date.** The Court has approved the later of (i) the Bar Date or (ii) twenty-one (21) days from the date on which the Debtor provided notice of the amendment to the Schedules and Statements (or another time period as may be fixed by the Court) as the date by which holders of claims or interests affected by the amendment must file proofs of claim or proofs of interest with respect to such claim or interest.

Parties to the Debtor's Leases and Executory Contracts

- A. Rejection of Leases and Contracts.** The Bankruptcy Code provides that the Debtor may, at any time before a plan is confirmed by the Court, choose to reject certain executory contracts or unexpired leases. If your contract or lease is rejected, you may have a claim resulting from that rejection.
- B. Proofs of Claim Relating to Rejection Damages.** The deadline to file a proof of claim for damages relating to the rejection of the contract or lease is the later of (a) the date set forth in an order authorizing the Debtor to reject contracts or leases pursuant to Bankruptcy Code section 365 (including any order confirming a plan in the Debtor's Chapter 11 Case) and (b) thirty (30) days from the later of the date the rejection order is entered or notice of rejection is provided.

Reservation of Rights

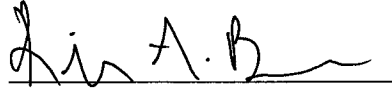
Nothing contained in this notice is intended to or should be construed as a waiver of the Debtor's right to: (a) dispute, or assert offsets or defenses against, any filed claim or interest or any claim or interest listed or reflected in the Schedules and Statements as to the nature, amount, liability, classification or validity thereof; (b) subsequently designate any scheduled claim or interest as disputed, contingent or unliquidated; and (c) otherwise amend or supplement the Schedules and Statements.

If you have any questions relating to this Notice, contact UpShot toll free at (855) 812-6112 or via electronic mail at saladworksinfo@upshotservices.com.

NEITHER THE ATTORNEYS FOR THE DEBTOR NOR UPSHOT IS AUTHORIZED TO PROVIDE YOU WITH LEGAL ADVICE.

Dated: April 22, 2015
Wilmington, DE

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)
Kerri K. Mumford (No. 4186)
Kimberly A. Brown (No. 5138)
919 Market Street, Suite 1800
Wilmington, DE 19801
Tel: (302) 467-4400
Fax: (302) 467-4450
Email: landis@lrclaw.com
mumford@lrclaw.com
brown@lrclaw.com

Counsel to the Debtor and Debtor-In-Possession