

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Kal Freight Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-90614 (CML)

(Jointly Administered)

**NOTICE OF (I) CONFIRMATION AND OCCURRENCE OF EFFECTIVE  
DATE OF DEBTORS' PLAN OF LIQUIDATION; (II) DEADLINES  
FOR FILING CERTAIN CLAIMS AND REQUESTS FOR PAYMENT; (III) IDENTITY  
OF LIQUIDATING TRUSTEE; (IV) CLOSING OF SALE; AND (V) TRANSITION  
SERVICES AGREEMENT AND COOPERATION FOR RETURN OF  
COLLATERAL/TRUCKS AND TRAILERS**

**(Related Docket No. 1023)**

**PLEASE TAKE NOTICE** of the following:

1. Confirmation and Occurrence of Effective Date. On April 17, 2025 the United States Bankruptcy Court for the Southern District of Texas (the "Bankruptcy Court") entered an Order confirming, pursuant to section 1129 of the Bankruptcy Code, the *Modified Fourth Amended and Restated Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* (as amended and supplemented from time to time, collectively, with all exhibits, supplements, and schedules thereto, the "Plan"), which was attached as Exhibit A to the *Order Granting Final Approval of Disclosure Statement and Confirming Plan of Liquidation of Kal Freight Inc. and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 1023] (the "Confirmation Order").<sup>2</sup> The Effective Date, as defined in the Plan, occurred on **April 18, 2025**. Among the other provisions of the Plan and the Confirmation Order, the release, exculpation, and injunction provisions of the Plan are now in full force and effect.

2. Identity of Liquidating Trustee. Pursuant to, *inter alia*, paragraph 59 of the Confirmation Order, the identity of the Liquidating Trustee, as selected by the Committee, shall be Paul Navid.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification numbers, are: KAL Freight Inc. (0249); KAL Aviation LLC (2600); KAL Partz Inc. (0139); KAL Trailers & Leasing Inc. (0840); and KVL Tires Inc. (0320). The location of the Debtors' service address in these Chapter 11 cases is 10156 Live Oak Ave., Fontana, CA 92335.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan and the Confirmation Order, as applicable. For the avoidance of doubt, to the extent of any conflict between the terms of this Notice and the terms of the Plan and Confirmation Order, the terms of the Plan and Confirmation Order, as applicable, shall control.

3. Closure of Sale. The closing of the sale of certain of Debtors Kal Freight Inc.'s and Kal Trailers & Leasing, Inc. assets (the "Sale"), as approved by the Bankruptcy Court at Docket No. 857, to Noor Transport Leasing, LLC (the "Buyer") occurred on April 16, 2025 (the "Closing Date").

4. Cooperation for Return of Collateral/Trucks and Trailers; Transition Services Agreement. In connection with the Sale, the Debtors and Buyer entered into that certain *Transition Services Agreement*, as of the Closing Date (the "TSA"). Pursuant to the TSA, the Buyer is obligated to, *inter alia*, "cooperate with such lenders and/or lessors in good faith and provide such assistance as they may reasonably request with respect to the recovery of their collateral and otherwise take necessary actions to cause such lenders and lessors the return of their trucks and trailers."

5. Bar Dates and Deadlines:

a. Rejection Bar Date. All proofs of claim with respect to Claims arising from the rejection of executory contracts or unexpired leases pursuant to the Confirmation Order must be filed with the Bankruptcy Court so as to be actually received on before **May 19, 2025** (which is the first business day at least 30 days after the Effective Date) (the "Rejection Bar Date"). Any Claim arising from the rejection of an executory contract or unexpired lease pursuant to the Confirmation Order that is not filed within such time will be subject to objection. All such Claims for which Proofs of Claim are timely and properly filed and ultimately Allowed will be treated as General Unsecured Claims subject to the provisions of, *inter alia*, Section X.C of the Plan.

b. Administrative Expense Bar Date. Except as otherwise provided by the Confirmation Order or the Plan, all requests for payment of Administrative Claims (other than Professional Fee Claims) that arose on or after December 5, 2024 (the Petition Date), shall be filed with the Bankruptcy Court so as to be actually received on or before **May 19, 2025** (which is the first business day at least 30 days after the Effective Date). Holders of Administrative Claims that are required to file and serve a request for payment of such Administrative Claims and that do not file and serve such a request by the Administrative Expense Bar Date shall be forever barred from asserting such Administrative Claims against the Debtors, the Estates, the Liquidating Trust, or their respective property.

c. Professional Fee Claims Deadline. Pursuant to the Plan, the deadline to file final requests for payment of Professional Fee Claims in accordance with Section VIII.C of the Plan, is **June 2, 2025** (which is 45 days after the Effective Date) (the "Professional Fee Claims Deadline").

6. Binding Effect. The provisions of the confirmed Plan shall bind the Debtors, the Liquidating Trust, the Liquidating Trustee, any Entity acquiring property under the Plan, any Beneficiary, and any Creditor or Interest Holder, whether or not such Creditor or Interest Holder has filed a Proof of Claim or Interest in the Chapter 11 Cases, whether or not the Claim of such Creditor or the Interest of such Interest Holder is impaired under the Plan, and whether or not such Creditor or Interest Holder has accepted or rejected the Plan.

7. Access to Documents. Copies of the Plan, the Confirmation Order, and any other related documents are available for inspection on the Court's website at

<https://www.txs.uscourts.gov/page/bankruptcy-court>, or free of charge on the Debtors' restructuring website at <https://cases.stretto.com/KALFreight/>.

Dated: April 18, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Teddy M. Kapur*

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**Certificate of Service**

I certify that on April 18, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Teddy M Kapur*

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Teddy M. Kapur