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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

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

DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS[2]

TO THE HONORABLE MICHAEL B. KAPLAN,
UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the "**Debtors**"), by and through their undersigned counsel, hereby file this omnibus objection (this "**Omnibus Objection**"), seeking entry of an order, substantially in the form attached hereto as **Exhibit A** (the "**Proposed Order**"), disallowing, expunging, reclassifying and/or modifying, as applicable, the claims (collectively, the "**Claims**") set forth on the schedules attached to the Proposed Order (collectively, the "**Schedules**"), as follows:

[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' 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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration or the Plan (each as defined herein), as applicable.

(a) disallowing and expunging in their entirety the Claims (the "**Superseded Claims**") listed on **Schedule 1** as each such Claim is superseded by a later filed proof of claim (each, a "**Surviving Claim**" and collectively, the "**Surviving Claims**");

(b) disallowing and expunging in their entirety the Claims (the "**Exact Duplicative Claims**") listed on **Schedule 2** as each such Claim is as duplicative of a Surviving Claim filed by or on behalf of the same claimant in the same amount and against the same Debtor entity;

(c) disallowing and expunging in their entirety the Claims (the "**Substantively Duplicative Claims**") listed on **Schedule 3** as each such Claim is as substantively duplicative of a Surviving Claim filed by or on behalf of the same claimant in respect of the same liabilities but against different Debtor entities;

(d) disallowing and expunging in their entirety the Claims (the "**No Liability Claims**") listed on **Schedule 4** because the Debtors are not liable for such claims;

(e) disallowing and expunging in their entirety the Claims (the "**Unsubstantiated Claims**") listed on **Schedule 5** as each such Claim is unliquidated, the corresponding proof of claim contains insufficient documentation to determine whether any liability exists and is otherwise not supported by the Debtors' books and records; and

(f) reclassifying the claims (the "**Reclassified Claims**") listed on **Schedule 6** because each such claim is improperly classified as an administrative or priority claim and should be reclassified as a general unsecured claim.

In support of the Omnibus Objection, the Debtors submit the *Declaration of Thomas Behnke in Support of the Debtors' First Omnibus Objection to Claims*, attached hereto as **Exhibit B** (the "**Behnke Declaration**"), and the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of New Jersey (this "**Court**") has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, dated September 18, 2012 (Simandle, C.J.) (the "**Standing Order**"). This is a core proceeding pursuant to 28 U.S.C. § 157(b).

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

3. The bases for the relief requested herein are section 502 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "**Local Rules**") and the Court's *Chapter 11 Complex Case Procedures*, as amended December 2, 2025 (the "**Complex Case Procedures**").

BACKGROUND[3]

A. The Chapter 11 Cases

4. On July 1, 2025, each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code (collectively, these "**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. On July 2, 2025, the Court entered an order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), authorizing procedural consolidation and joint administration of these Chapter 11 Cases under the caption *In re Del Monte Foods Corporation II Inc., et al.*, Case No. 25-16984 (MBK) [Docket No. 54]. On July 2, 2025, the Court entered the *Order Granting Chapter 11 Complex Case Designation* [Docket No. 55], and on July 15, 2025, the Court entered the *Chapter 11 Complex Case Management Order* [Docket No. 154] (the "**Case Management Order**"), *inter alia*, determining that the Complex Case Procedures apply to these Chapter 11 Cases.

5. On July 17, 2025, the United States Trustee for the District of New Jersey (the "**U.S. Trustee**") appointed an official committee of unsecured creditors [Docket No. 168] (the

[3] A detailed description of the Debtors, their businesses, and the facts and circumstances supporting the Debtors' Chapter 11 Cases are set forth in greater detail in the *Declaration of Jonathan Goulding, as Chief Restructuring Officer, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 19] (the "**First Day Declaration**").

"**Committee**"), which was reconstituted on March 24, 2026 [Docket No. 1343], and further reconstituted on April 22, 2026 [Docket No. 1462]. As of the date hereof, no request for the appointment of a trustee or examiner has been made.

6. On August 15, 2025, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket Nos. 381–396, 398–399] (collectively, and as amended by the Amended Schedule E/F for Debtor Del Monte Foods Corporation II Inc. [Docket No. 839], the "**SOFA/SOAL**").

7. On September 25, 2025, the Court entered the Bar Date Order,[4] which, among other relief, established certain deadlines for filing proofs of claim against the Debtors' estates, including (i) November 5, 2025 as the General Claims Bar Date, and (ii) December 29, 2025 as the Governmental Bar Date (each as defined in the Bar Date Order).

8. On February 25, 2026, the Debtors filed the *Joint Chapter 11 Plan of Del Monte Foods Corporation II Inc. and Its Debtor Affiliates* [Docket No. 1229] (as may be amended, supplemented, or otherwise modified from time to time, including by the *First Amended Joint Chapter 11 Plan of Del Monte Foods Corporation II Inc. and Its Debtor Affiliates (With Technical Modifications)* [Docket No. 1502], the "**Plan**").

9. On May 12, 2026, the Court held a hearing to consider confirmation of the Plan and final approval of the related disclosure statement. On May 18, 2026, the Court issued a decision from the bench, confirming the Plan pursuant to section 1129 of the Bankruptcy Code and directing the parties to submit a form of order consistent with that ruling.

[4] *See Order (I) Setting Bar Dates for Submitting Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form, Manner, and Procedures for Filing Proofs of Claim, (IV) Approving Notice Thereof, and (V) Granting Related Relief* [Docket No. 462] (the "**Bar Date Order**").

10. 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.

B. The Claims Reconciliation Process

11. Pursuant to the Complex Case Procedures, a copy of which is attached to the Case Management Order, the Debtors are authorized to file omnibus objections to no more than 250 claims at a time. Specifically, the Complex Case Procedures empower the Debtors to, among other things, object to claims that:

> (i) the amount claimed contradicts the debtor's books and records; (ii) the claims were incorrectly or improperly classified; (iii) the claims seek recovery of amounts for which the debtors are not liable; (iv) the claims do not include sufficient documentation to ascertain the validity of the claims or the claims fail to sufficiently specify the basis for the claims; (v) the Claims are filed against nondebtors, the wrong debtor or are filed against multiple debtors, except to the extent permitted under any bar date order entered in the applicable case, (vi) the claims are disallowed under section 502 of the Bankruptcy Code and (vii) the claimant has withdrawn the claim formally pursuant to either a pleading or the entry of a Court order.

Complex Case Procedures, VIII(b).

12. In anticipation of the Effective Date of the Plan and the ultimate wind-down process contemplated thereunder, the Debtors, together with their advisors, have been working diligently to analyze and reconcile certain claims filed against the Debtors' estates.

RELIEF REQUESTED

13. By this Omnibus Objection, the Debtors object to the Claims pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, Local Rule 3007-1 and the Complex Case Procedures. The Debtors respectfully request entry of the Proposed Order expunging,

disallowing reclassifying and/or modifying each of the Claims as set forth on the Schedules attached to the Proposed Order.

OBJECTION

14. Section 502(a) of the Bankruptcy Code provides that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). The burden of proof for determining the validity of claims rests on different parties at different stages of the claims-objection process. As explained by the United States Court of Appeals for the Third Circuit:

> The burden of proof for claims brought in the bankruptcy court under 11 U.S.C.A. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is 'prima facie' valid [citations omitted]. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants' initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the prima facie validity of the filed claim. . . . In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim's legal sufficiency.

In re Allegheny Int'l Inc., 954 F.2d 167, 173–74 (3d Cir. 1992) (citation omitted); *accord Lampe v. Lampe*, 665 F.3d 506, 514 (3d Cir. 2011). Once the prima facie validity of a claim is rebutted, the burden shifts back to the claimant to prove the validity of the asserted claim by a preponderance of the evidence. *Id*. at 173. The burden of persuasion is always on the claimant. *Lampe*, 665 F.3d 506, 514 (citing *In re Allegheny Int'l Inc.*, 954 F.2d at 174); *accord In re G-I Holdings, Inc.*, Nos. 01-30135 (RG), 01-38790(RG), 2016 Bankr. LEXIS 3314, at *124–25 (Bankr. D.N.J. Sep. 9, 2016) (describing and applying the "burden-shifting framework").

15. A claim, however, should not be allowed if that claim is unenforceable against a debtor and property of a debtor, under any agreement or applicable law. *See* 11 U.S.C. § 502(b)(1). If an objection is made to the proof of claim, the claimant has the ultimate burden of persuasion as to the validity and amount of the claim. *See Allegheny Int'l*, 954 F.2d at 172.

16. Bankruptcy Rule 3007 provides certain grounds upon which "objections to more than one claim may be joined in an omnibus objection," including claims that "duplicate other claims" or "have been amended by later proofs of claim." Bankruptcy Rule 3007(d)(2). Under the Local Rules, an omnibus objection may be filed "to reduce the amount of a claim or to modify a claim's priority status." D.N.J. LBR 3007-2. Moreover, as set forth above, the Complex Case Procedures set forth numerous other grounds on which objections to more than one claim may be joined in an omnibus objection. *See* Complex Case Procedures VIII(b).

A. The Superseded Claims Should Be Disallowed and Expunged.

1. The Superseded Claims identified on **Schedule 1** to the Proposed Order consist of duplicative Claims each filed by a creditor against the same Debtor entity, and should be disallowed and expunged in their entirety, with only the corresponding Surviving Claim remaining on the Claims Register.

2. Based on the Debtors' careful review of their books and records, the SOFA/SOAL, the Superseded Claims, the corresponding Surviving Claims, including supporting documentation provided by the claimant, if any, the Debtors have determined that each of the claimants who filed a Superseded Claim subsequently filed an additional Surviving Claim which should supersede and replace the Superseded Claims. Unless the Superseded Claims are disallowed and expunged as requested herein, the claimant may receive a disproportionately large distribution in these Chapter 11 Cases in contravention of the provisions and policies of the

Bankruptcy Code and the Plan, and to the direct detriment of the Debtors and their estates and other creditors.

3. For the reasons set forth in this Omnibus Objection, **Schedule 1**, and the Behnke Declaration, the Debtors submit that each of the Superseded Claims asserts a claim against the Debtors that has been amended and/or superseded by a later filed claim. Accordingly, the Debtors seek entry of the Proposed Order disallowing and expunging the Superseded Claims and authorizing the Debtors to update the Claims Register to reflect only the corresponding Surviving Claims indicated on **Schedule 1** to the Proposed Order.

B. The Exact Duplicative Claims Should Be Disallowed and Expunged.

4. The Duplicative Claims identified on **Schedule 2** to the Proposed Order consist of duplicative Claims each filed by a creditor against the same Debtor entity, and should be disallowed and expunged in their entirety, with only the corresponding Surviving Claim remaining on the Claims Register.

5. Based on the Debtors' careful review of their books and records, the SOFA/SOAL, and the Exact Duplicative Claims and the corresponding Surviving Claims, including supporting documentation provided by the claimant, if any, the Debtors have determined that each of the Duplicative Claims assert identical amounts against the same Debtor entities. The challenged Claims do not represent independent liabilities of the Debtors' estates. Unless the Exact Duplicative Claims are disallowed and expunged as requested herein, the claimant may receive a disproportionately large distribution in these Chapter 11 Cases in contravention of the provisions and policies of the Bankruptcy Code and the Plan, and to the direct detriment of the Debtors and their estates and other creditors.

6. Accordingly, for the reasons set forth in this Omnibus Objection, **Schedule 2**, and the Behnke Declaration, the Debtors seek entry of the Proposed Order disallowing and expunging the Exact Duplicative Claims and authorizing the Debtors to update the Claims Register to reflect only the corresponding Surviving Claims indicated on **Schedule 2** to the Proposed Order.

C. The Substantively Duplicative Claims Should Be Disallowed and Expunged.

7. The Substantively Duplicative Claims identified on **Schedule 3** to the Proposed Order consist of duplicative Claims filed by the same creditors against multiple Debtor entities asserting the same underlying liabilities, and should be disallowed and expunged in their entirety, with only the corresponding Surviving Claim remaining on the Claims Register.

8. Based on the Debtors' careful review of their books and records, the SOFA/SOAL, and the Substantively Duplicative Claims and corresponding Surviving Claims, including supporting documentation provided by the claimant, if any, the Debtors have determined that each of the Substantively Duplicative Claims reflect identical amounts arising from the same transactions or obligations but are asserted against different Debtor entities within the Debtors' corporate structure. The challenged Claims do not represent independent liabilities of the Debtors' estates, notwithstanding that more than one Debtor may be liable for the asserted amount. Such Substantively Duplicative Claims are eliminated under the Plan, which provides:

> For all purposes associated with distributions under the Plan, all guarantees by any Debtor of the obligations of any other Debtor, as well as any joint and several liability of any Debtor with respect to any other Debtor, shall be deemed eliminated so that any obligation that could otherwise be asserted against more than one Debtor shall result in a single distribution under the Plan, *provided* that Claims held by a single Entity at different Debtors that are not based on guarantees or joint and several liability shall be entitled to the applicable distribution for such Claim at each applicable Debtor. Any such Claims shall be released pursuant to Article VIII

> of the Plan and shall be subject to all potential objections, defenses, and counterclaims, and to estimation pursuant to section 502(c) of the Bankruptcy Code.

Plan, Art. VI.B.

9. Unless the Substantively Duplicative Claims are disallowed and expunged as requested herein, the claimant may receive a disproportionately large distribution in these Chapter 11 Cases in contravention of the provisions and policies of the Bankruptcy Code and the Plan, and to the direct detriment of the Debtors and their estates and other creditors.

10. Accordingly, for the reasons set forth in this Omnibus Objection, **Schedule 3**, and the Behnke Declaration, the Debtors seek entry of the Proposed Order disallowing and expunging the Substantively Duplicative Claims and authorizing the Debtors to update the Claims Register to reflect only the corresponding Surviving Claims indicated on **Schedule 3** to the Proposed Order.

C. The No Liability Claims Should Be Expunged and Disallowed.

11. The No Liability Claims identified on **Schedule 4** consist of Claims for which the Debtor has no liability because the asserted obligations relate to separate and unrelated entities. These Claims were filed primarily by taxing authorities, including various counties, municipalities, and educational districts, and assert amounts characterized as tax obligations against one of the Debtors. In each instance, however, the underlying liability does not pertain to the identified Debtor but instead arises from obligations of non-Debtor third parties. As a result, the challenged No Liability Claims do not represent valid liabilities of the Debtors and should be disallowed and expunged in their entirety.

12. Accordingly, for the reasons set forth in this Omnibus Objection, **Schedule 4**, and the Behnke Declaration, the Debtors seek entry of the Proposed Order disallowing and expunging the No Liability Claims indicated on **Schedule 4** to the Proposed Order.

D. The Unsubstantiated Claims Should Be Disallowed and Expunged.

13. The Unsubstantiated Claims identified on **Schedule 5** to the Proposed Order consist of Claims for which the supporting documentation is insufficient to establish the validity, amount, or nature of the asserted liability, and should be disallowed and expunged in their entirety.

14. These Unsubstantiated Claims were filed primarily by individual claimants, many of whom assert claims in unliquidated or undetermined amounts, and in most cases, fail to provide any meaningful supporting documentation, such as contracts or invoices, or other evidence sufficient to substantiate the alleged claims. Moreover, through the Debtors' independent review, the Debtors have determined that the Unsubstantiated Claims are not supported by the Debtors' books and records. As a result, the Debtors are unable to determine whether any liability exists or to assess the accuracy or propriety of the amounts asserted. Accordingly, the Unsubstantiated Claims fail to meet the requirements of Bankruptcy Rule 3001 and do not represent substantiated obligations of the Debtors' estates and should therefore be disallowed and expunged.

15. Accordingly, for the reasons set forth in this Omnibus Objection and the Behnke Declaration, the Debtors seek entry of the Proposed Order disallowing and expunging the Unsubstantiated Claims indicated on **Schedule 5** to the Proposed Order.

E. The Reclassified Claims Should Be Reclassified.

16. The Reclassified Claims identified on **Schedule 6** to the Proposed Order consist of Claims that should reclassified because the priority, administrative, or secured status asserted by each claimant is not supported by applicable law or the underlying facts.

17. The Reclassified Claims were filed by a range of creditors, including trade vendors and service providers, and include claims with asserted priority status under section 507(a), administrative expense status, and secured claims.[5] Based on the Debtors' careful review of their books and records, the SOFA/SOAL, and the Reclassified Claims, including supporting documentation provided by the claimant, if any, the Debtors have determined that the asserted classifications are improper, including because the Reclassified Claims arise from services rather than qualifying goods, fall outside the applicable statutory time periods, are asserted by non-qualifying entities, or lack sufficient evidence to support priority, administrative or secured status. As a result, the Reclassified Claims should be reclassified, in whole or in part, as general unsecured claims to reflect their proper treatment under the Bankruptcy Code.

18. Accordingly, for the reasons set forth in this Omnibus Objection, **Schedule 6**, and the Behnke Declaration, the Debtors seek entry of the Proposed Order reclassifying the Reclassified Claims in their reclassified amounts and priority statuses indicated on **Schedule 6** to the Proposed Order.

[5] To the extent any of the Reclassified Claims assert an administrative expense claim, such party must satisfy the heavy burden to establish entitlement to administrative priority treatment. *Howard Delivery Serv., Inc. v. Zurich Am. Ins. Co.*, 547 U.S. 651, 667 (2006) ("To give priority to a claimant not clearly entitled thereto is not only inconsistent with the policy of equality of distribution; it dilutes the value of the priority for those creditors Congress intended to prefer.") (citation omitted). To meet its burden, a party moving for payment of an administrative priority claim generally must demonstrate that the claim (i) arises from a post-petition transaction between the party claiming the administrative priority and debtor in possession, and (ii) conferred benefit upon the bankruptcy estate. *See In re Energy Future Holdings Corp.*, 990 F.3d 728, 741 (3d Cir. 2021) (citing *In re Women First Healthcare, Inc.*, 332 B.R. 115, 121 (Bankr. D. Del. 2005)).

RESERVATION OF RIGHTS

19. The Debtors hereby reserve their right to amend, modify, and supplement This Omnibus Objection, prior to the hearing before the Court on this Omnibus Objection, if any; *provided, however*, that nothing in this Omnibus Objection shall affect the Debtors' right to object to any other proof of claim at a future date on a basis other than as set forth in this Omnibus Objection as permitted by bankruptcy and nonbankruptcy law, subject to any limitations set forth in the Local Rules or in the Proposed Order.

20. Notwithstanding anything to the contrary herein, nothing contained in this Omnibus Objection or any actions taken pursuant to any order granting the relief requested by this Omnibus Objection is intended or should be construed as (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Debtors' or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, priority claim, secured claim or otherwise of a type specified or defined in this Omnibus Objection or any order granting the relief requested herein; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission by the Debtors as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; (g) a waiver or limitation of the Debtors' or any other party in interest's claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law; (h) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code; (i) a

concession by the Debtors that any liens (contractual, common law, statutory, or otherwise) that may be satisfied pursuant to the relief requested in this Omnibus Objection are valid, and the rights of all parties in interest are expressly reserved to contest the extent, validity, or perfection or seek avoidance of all such liens; or (j) otherwise affecting the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease.

SEPARATE CONTESTED MATTERS

21. Each of the Claims objected to by the Debtors in the Omnibus Objection constitutes a separate contested matter under Bankruptcy Rule 9014. The Debtors respectfully request that any order entered by the Court with respect to an objection asserted in this Omnibus Objection shall be deemed a separate order with respect to each claim.

NO PRIOR REQUEST

22. No prior request for the relief sought in the Omnibus Objection has been made to this or any other court.

NOTICE

23. The Debtors will provide notice of this Omnibus Objection to: (i) the U.S. Trustee; (ii) counsel to the Ad Hoc Term Lender Group; (iii) counsel to the Super-Senior Agent; (iv) counsel to the DIP Agents; (v) counsel to the Committee; (vi) the United States Attorney's Office for the District of New Jersey; (vii) the attorneys general for all states in which the Debtors conduct business; (viii) the United States Department of Justice; (ix) the Internal Revenue Service; and (x) the Claimants listed in the Schedules attached to the Proposed Order; and (xi) all parties requesting notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

CONCLUSION

WHEREFORE, for the reasons stated herein, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested in the Omnibus Objection and such other and further relief as the Court deems just and proper.

Dated: May 28, 2026

/s/ Michael D. Sirota
Michael D. Sirota

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

ORDER SUSTAINING THE DEBTORS'
FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS

The relief set forth on the following pages, numbered three (3) through six (6), together with the schedules attached hereto, is hereby **ORDERED**.

[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' 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.

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

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Co-Counsel to the Debtors and
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Upon consideration of the *Debtors' First Omnibus Objection to Certain Claims* (the "**Omnibus Objection**")[1] on behalf of the above-captioned debtors and debtors in possession (the "**Debtors**"); and the Court having jurisdiction to consider the Omnibus Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order; and this Court having found that venue of this proceeding and the Omnibus Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that the Debtors' notice of the Omnibus Objection was appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Omnibus Objection and having heard the statements in support of the relief requested therein at a hearing before this Court (the "**Hearing**"), if any; and this Court having determined that the legal and factual bases set forth in the Omnibus Objection and at the Hearing, if any, establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Omnibus Objection is **SUSTAINED** as set forth herein.

2. Each Claim listed on **Schedule 1**, **Schedule 2**, and **Schedule 3** hereto and designated as "Claims to be Disallowed" shall be disallowed and expunged in its entirety. The "Surviving Claims" identified thereon will remain on the Claims Register and such claims are neither allowed nor disallowed at this time, and may be subject to any future objection on any

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

basis, whether by the Debtors or the Wind-Down Debtors, as applicable. Nothing herein shall constitute, nor shall it be deemed to constitute, the allowance of any of the Surviving Claims.

3. Each Claim listed on **Schedule 4** and **Schedule 5** hereto is hereby disallowed and expunged in its entirety.

4. Each Claim listed on **Schedule 6** hereto is hereby modified as set forth thereon, identified in the "Modified Claims" column. The Modified Claims will remain on the Claims Register and such claims are neither allowed nor disallowed at this time, and may be subject to any future objection on any basis, whether by the Debtors or the Wind-Down Debtors, as applicable. Nothing herein shall constitute, nor shall it be deemed to constitute, the allowance of any of the Modified Claims.

5. The Debtors are authorized to take any action necessary or appropriate to give effect to this Order and the relief granted therein.

6. Stretto, Inc. (the "**Claims Agent**") is authorized and directed to modify the Claims Register in accordance with entry of the relief granted in this Order.

7. The Debtors, their estates, any successors thereto (including, for the avoidance of doubt, the Wind-Down Debtors and the Plan Administrator pursuant to the Plan), and any other party in interest shall retain and shall have the right to object in the future to any of the Claims listed on the Schedules on any additional grounds, and the Debtors shall retain and shall have the right to amend, modify and/or supplement the Omnibus Objection as may be necessary.

8. Notwithstanding anything to the contrary herein, nothing contained in this Order shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Debtors' or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, priority claim, secured claim or otherwise of a type specified or defined in the Omnibus Objection or any order granting the relief requested by this Omnibus Objection; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission by the Debtors as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; (g) a waiver or limitation of the Debtors' or any other party in interest's claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law; (h) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code; (i) a concession by the Debtors that any liens (contractual, common law, statutory, or otherwise) that may be satisfied pursuant to the relief requested in the Omnibus Objection are valid, and the rights of all parties in interest are expressly reserved to contest the extent, validity, or perfection or seek avoidance of all such liens; or (j) otherwise affecting the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease

9. The Debtors' objection to each Claim addressed in the Omnibus Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each of the Claims. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

10. This Order is without prejudice to the rights of the Debtors, the Debtors' estates, any successors thereto, and any other party in interest to object to any other claim filed in these Chapter 11 Cases.

11. The Court shall retain jurisdiction over the claimants whose claims are subject to the Omnibus Objection with respect to any matter arising from or related to the Omnibus Objection or this Order, including the interpretation, enforcement and implementation of this Order.

12. Notice of the Omnibus Objection as provided therein shall be deemed good and sufficient notice of such Omnibus Objection and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

13. Notwithstanding anything in the Federal Rules of Bankruptcy Procedure to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Schedule 1

Superseded Claims

Del Monte Foods Corporation II Inc., Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
1	Allied Universal Security Services Attn: Kadian Blanson, Michael DiPilato 1395 University Blvd. Jupiter, FL 33458	11/04/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	373	Unsecured	$15,161.92	Universal Protection Services, LP (d/b/a Allied Universal Security Services) c/o Allied Universal Security Services Attn: Matthew Lambach, VP/Assoc. General Counsel 161 Washington Street, Suite 600 Conshohocken, PA 19428	11/25/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	495	Unsecured	$134,880.05
	Reason: Claim #373 is amended and superseded by claim #495.											
2	Allied Universal Security Services Attn: Kadian Blanson, Michael DiPilato 1395 University Blvd. Jupiter, FL 33458	11/04/25	25-16995 (MBK) Del Monte Foods, Inc.	378	Unsecured	$15,161.92	Universal Protection Services, LP (d/b/a Allied Universal Security Services) c/o Allied Universal Security Services Attn: Matthew Lambach, VP/Assoc. General Counsel 161 Washington Street, Suite 600 Conshohocken, PA 19428	11/25/25	25-16995 (MBK) Del Monte Foods, Inc.	496	Unsecured	$134,880.05
	Reason: Claim #378 is amended and superseded by claim #496.											
3	Ashlock Company, a division of Vistan Corporation Attn: Ryan A. Witthans 456 Montgomery St Ste 1300 San Francisco, CA 94104	09/12/25	25-16995 (MBK) Del Monte Foods, Inc.	137	Unsecured	$102,296.13	Ashlock Company, a division of Vistan Corporation Attn: Jennifer C. Hayes and Ryan A. Witthans 456 Montgomery St Ste 1300 San Francisco, CA 94104	10/20/25	25-16995 (MBK) Del Monte Foods, Inc.	235	Unsecured	$166,470.33
	Reason: Claim #137 is amended and superseded by claim #235.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
4	Beard New York VII 530 11th Street Modesto, CA 95354	09/16/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	142	Unsecured	$347,621.75	Beard New York VII, Inc. 530 11th Street Modesto, CA 95354	05/13/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	567	Unsecured	$4,547,053.00
	Reason: Claim #142 is amended and superseded by Claim #567.											
5	Benton County Tax Collector 2113 W. Walnut St. Rogers, AR 72756	07/22/25	25-16995 (MBK) Del Monte Foods, Inc.	34	Priority	$1,502.98	Benton County Collector 2113 W. Walnut St. Rogers, AR 72756	09/23/25	25-16995 (MBK) Del Monte Foods, Inc.	153	Priority	$0.00
	Reason: Claim #34 is amended and superseded by claim #153.											
6	California State Labor Commissioner Attn: Lindsey Lara 1500 Hughes Way, Suite C-202 Long Beach, CA 90810	10/30/25	25-16995 (MBK) Del Monte Foods, Inc.	292	Unsecured	$196,646.19	California Labor Commissioner Attn: Lindsey Lara 1500 Hughes Way, Suite C-202 Long Beach, CA 90810	03/23/26	25-16995 (MBK) Del Monte Foods, Inc.	538	Unsecured	$62,347.22
	Reason: Claim #292 is amended and superseded by claim #538.											
7	Fragomen, Del Rey, Bernsen & Loewy, LLP Attn: Jennifer O'Brien 90 Matawan Road 4th Floor Matawan, NJ 07747	10/27/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	263	Unsecured	$6,553.73	Fragomen, Del Rey, Bernsen & Loewy, LLP Attn: Jennifer O'Brien 90 Matawan Road 4th Floor Matawan, NJ 07747	10/27/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	264	Unsecured	$6,553.73
	Reason: Claim #263 is amended and superseded by claim #264.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
8	Ogletree, Deakins, Nash, Smoak, and Stewart, P.C 50 International Drive Suite 300 PO BOX 89 Columbia, SC 29202	07/24/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	38	Unsecured	$140,975.09	Ogletree, Deakins, Nash, Smoak, and Stewart, P.C Attn: Christina Wall McDaniel & Accounts Receivable 50 International Drive Suite 300 PO Box 89 Columbia, SC 29202	10/30/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	290	Unsecured	$141,357.94
	Reason: Claim #38 is amended and superseded by claim #290.											
9	Oregon Department of Revenue Attn: Bonnie Chisman 955 Center St NE Salem, OR 97301	12/16/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	510	Unsecured	$0.00	Oregon Department of Revenue 955 Center St NE Salem, OR 97301-2555	04/03/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	542	Priority	$1,815.63
	Reason: Claim #510 is amended and superseded by claim #542.											
10	Oregon Department of Revenue Attn: Bonnie Chisman 955 Center St NE Salem, OR 97301	02/13/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	529	Priority	$1,815.63	Oregon Department of Revenue 955 Center St NE Salem, OR 97301-2555	04/03/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	542	Priority	$1,815.63
	Reason: Claim #529 is amended and superseded by claim #542.											
11	Oregon Processors Seasonal Employees Pension Plan 210 SW Morrison St Ste 500 Portland, OR 97204	10/16/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	220	Unsecured	$3,021,740.00	Oregon Processors Seasonal Employees Pension Plan c/o Bennett Hartman, LLP Attn: Kate Flanagan 210 SW Morrison St Ste 500 Portland, OR 97204	03/20/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	536	Unsecured	$2,965,125.44
	Reason: Claim #220 is amended and superseded by claim #536.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
12	Sager Creek Foods, Inc. 900 Jackson Street Suite 570 Dallas, TX 75202	09/18/25	25-17005 (MBK) Sager Creek Foods, Inc.	143	Unsecured	$79,183.50	Walmart Inc. 900 Jackson Street Suite 570 Dallas, TX 75202	09/22/25	25-17005 (MBK) Sager Creek Foods, Inc.	150	Unsecured	$79,183.50
	Reason: Claim #143 is amended and superseded by claim #150.											
13	SCG Capital Corporation c/o Tydings & Rosenberg LLP Attn: Joseph Selba One East Pratt Street, Suite 901 Baltimore, MD 21202	10/30/25	25-16995 (MBK) Del Monte Foods, Inc.	302	Admin Unsecured Total	$44,587.59* Undetermined* $44,587.59*	SCG Capital Corporation Attn: Joseph Selba One East Pratt Street, Suite 901 74 West Park Place Baltimore, MD 21202	05/01/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	545	Unsecured	Undetermined*
	Reason: Claim #302 is amended and superseded by Claim #545.											
14	Spins LLC [SPINS TopCo, Inc.] PO Box 776803 Chicago, IL 60677-6803	10/15/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	210	Unsecured	$19,416.68	Spins LLC c/o Senior Manager, Billing & Collections Attn: Adam Wynne 311 W Huron St Ste 900 Chicago, IL 60654-3629	11/05/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	414	Unsecured	$205,304.24
	Reason: Claim #210 is amended and superseded by claim #414.											
15	State of New Jersey Division of Taxation Attn: Victoria Wright 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	01/15/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	524	Priority	$61,764.87	State of New Jersey Division of Taxation Attn: Victoria Wright 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	03/12/26	25-16984 (MBK) Del Monte Foods Corporation II Inc.	533	Priority	$11,764.87
	Reason: Claim #524 is amended and superseded by claim #533.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
16	State of New Jersey Division of Taxation Attn: Victoria Wright 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	01/15/26	25-16995 (MBK) Del Monte Foods, Inc.	525	Priority	$47,665.00	State of New Jersey Division of Taxation 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	05/11/26	25-16995 (MBK) Del Monte Foods, Inc.	564	Unsecured	$0.00
	Reason: Claim # 525 is amended and superseded by Claim #564.											
17	State of New Jersey Division of Taxation Attn: Victoria Wright 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	03/12/26	25-16995 (MBK) Del Monte Foods, Inc.	534	Priority	$30,000.00	State of New Jersey Division of Taxation 3 John Fitch Way PO Box 245 Trenton, NJ 08695-0245	05/11/26	25-16995 (MBK) Del Monte Foods, Inc.	564	Unsecured	$0.00
	Reason: Claim # 534 is amended and superseded by Claim #564.											
18	Texas Comptroller of Public Accounts c/o Office of the Attorney General Attn: Bankruptcy & Collections Division PO Box 12548, MC-008 Austin, TX 78711	12/01/25	25-16995 (MBK) Del Monte Foods, Inc.	501	Priority Unsecured Total	$33,404.07 $3,002.80 $36,406.87	Texas Comptroller of Public Accounts c/o Office of the Attorney General Attn: Bankruptcy & Collections Division PO Box 12548, MC-008 Austin, TX 78711-2548	02/05/26	25-16995 (MBK) Del Monte Foods, Inc.	528	Priority	$33,404.07
	Reason: Claim #501 is amended and superseded by claim #528.											
19	Texas Workforce Commission PO Box 12548, MC-008 Austin, TX 78711-2548	09/08/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	129	Priority	$3,771.89	Texas Workforce Commission PO Box 12548, MC-008 Austin, TX 78711-2548	10/03/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	160	Priority	$3,926.87
	Reason: Claim #129 is amended and superseded by claim #160.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
20	United Liquid Waste Recycling, Inc. 715 Morgan St PO Box 247 Clyman, WI 53016	08/14/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	94	Unsecured	$12,823.00	United Liquid Waste Recycling, Inc. PO Box 247 Clyman, WI 53016	10/08/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	174	Unsecured	$22,264.94
	Reason: Claim #94 is amended and superseded by claim #174.											
21	United Liquid Waste Recycling, Inc. 715 Morgan St PO Box 247 Clyman, WI 53016	08/15/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	98	Unsecured	$12,823.00	United Liquid Waste Recycling, Inc. PO Box 247 Clyman, WI 53016	10/08/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	174	Unsecured	$22,264.94
	Reason: Claim #98 is amended and superseded by claim #174.											
22	Utah State Tax Commission 210 N 1950 W Salt Lake City, UT 84134-9000	07/03/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	6	503(b)(9)	$2,500.00	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	11/06/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	470	Priority	$0.00
	Reason: Claim #6 is amended and superseded by claim #470.											
23	Utah State Tax Commission 210 N 1950 W Salt Lake City, UT 84134-9000	07/03/25	25-16995 (MBK) Del Monte Foods, Inc.	7	Priority Unsecured Total	$4,968.12 $494.21 $5,462.33	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	11/06/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	468	Priority	$8,519.80
	Reason: Claim #7 is amended and superseded by claim #468.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc, Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 1 - Superseded Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
24	Wells Fargo Equipment Finance, Inc. 800 Walnut St. F0006-051 Des Moines, IA 50309	08/04/25	25-16995 (MBK) Del Monte Foods, Inc.	66	Unsecured	$133,380.10	Wells Fargo Equipment Finance, Inc. 800 Walnut St., F0006-051 Des Moines, IA 50309	10/21/25	25-16995 (MBK) Del Monte Foods, Inc.	239	Unsecured	$51,043.30
	Reason: Claim #66 is amended and superseded by claim #239.											
				TOTAL		**$4,339,260.17***				**TOTAL**		**$8,599,975.55***

*Indicates claim contains unliquidated and/or undetermined amounts

Schedule 2

Exact Duplicative Claims

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 2 - Exact Duplicative Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
1	BRIAN BALDWIN as Class Rep ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	407	Unsecured	Undetermined*	NAME ON FILE ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	410	Unsecured	Undetermined*
	Reason: Liabilities asserted in claim #407 are duplicative of liabilities asserted in claim #410.											
2	BRIAN BALDWIN as PAGA ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	408	Unsecured	Undetermined*	NAME ON FILE ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	410	Unsecured	Undetermined*
	Reason: Liabilities asserted in claim #408 are duplicative of liabilities asserted in claim #410.											
3	Brown-Campbell Company 11800 Investment Dr Shelby Township, MI 48315	09/15/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	149	Unsecured	$1,354.00	Brown-Campbell Company 11800 Investment Dr Shelby Township, MI 48315	10/02/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	157	Unsecured	$1,354.00
	Reason: Liabilities asserted in claim #149 are duplicative of liabilities asserted in claim #157.											
4	JASON MORAN as Class Rep ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	412	Unsecured	Undetermined*	NAME ON FILE ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	416	Unsecured	Undetermined*
	Reason: Liabilities asserted in claim #412 are duplicative of liabilities asserted in claim #416.											
5	JASON MORAN as PAGA ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	411	Unsecured	Undetermined*	NAME ON FILE ADDRESS ON FILE	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	416	Unsecured	Undetermined*
	Reason: Liabilities asserted in claim #411 are duplicative of liabilities asserted in claim #416.											

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 2 - Exact Duplicative Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
6	Leal Plumbing LLC [Servis Plumbing] 717 Comedy Ln Edinburg, TX 78542	09/05/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	128	Unsecured	$376.17	Servis Plumbing 717 Comedy Lane Edinburg, TX 78542	10/10/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	188	Unsecured	$376.17
	Reason: Liabilities asserted in claim #128 are duplicative of liabilities asserted in claim #188.											
7	Lowenstein Sandler LLP One Lowenstein Drive Roseland, NJ 07068	08/27/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	115	Unsecured	$34,679.60	Lowenstein Sandler LLP One Lowenstein Drive Roseland, NJ 07068	09/15/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	140	Unsecured	$34,679.60
	Reason: Liabilities asserted in claim #115 are duplicative of liabilities asserted in claim #140.											
8	Production Automation Incorporated 2075 Exchange St Montgomery, AL 36116	09/02/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	131	Unsecured	$54,002.26	Production Automation Incorporated 2075 Exchange St Montgomery, AL 36116	09/23/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	154	Unsecured	$54,002.26
	Reason: Liabilities asserted in claim #131 are duplicative of liabilities asserted in claim #154.											
9	United Liquid Waste Recycling, Inc. 715 Morgan St PO Box 247 Clyman, WI 53016	08/20/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	107	Unsecured	$22,264.94	United Liquid Waste Recycling, Inc. PO Box 247 Clyman, WI 53016	10/08/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	174	Unsecured	$22,264.94
	Reason: Liabilities asserted in claim #107 are duplicative of liabilities asserted in claim #174.											
				TOTAL		**$112,676.97***				**TOTAL**		**$112,676.97***

*Indicates claim contains unliquidated and/or undetermined amounts

Schedule 3

Substantively Duplicative Claims

Del Monte Foods Corporation II Inc., Case No. 25-16984 (MBK)

First Omnibus Objection

Ex. 3 - Substantively Duplicative Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
1	AIG Property Casualty, Inc. and its affiliates identified on the Addendum hereto Attn: Kevin J. Larner, Mary G. McCarthy 28 Liberty Street, Floor 22 New York, NY 10005	11/04/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	334	Unsecured	$4,118.00	AIG Property Casualty, Inc. Attn: Kevin J. Larner, Mary G. McCarthy 28 Liberty Street, Floor 22 New York, NY 10005	11/04/25	25-16995 (MBK) Del Monte Foods, Inc.	338	Unsecured	$4,118.00
	Reason: Liabilities asserted in claim #334 are duplicative of liabilities asserted in claim #338.											
2	Atlantic Specialty Insurance Company c/o Torre, Lentz, Gamell, Gary & Rittmaster, LLP Attn: Kevin M. Gary & Steven H. Rittmaster 100 Jericho Quadrangle, Suite 309 Jericho, NY 11753-2702	10/31/25	25-16994 (MBK) Del Monte Foods Holdings Limited	309	Secured Unsecured Total	$4,372,000.00 $2,323,000.00 $6,695,000.00	Atlantic Specialty Insurance Company c/o Torre, Lentz, Gamell, Gary & Rittmaster, LLP Attn: Kevin M. Gary & Steven H. Rittmaster 100 Jericho Quadrangle, Suite 309 Jericho, NY 11753-2702	10/31/25	25-16995 (MBK) Del Monte Foods, Inc.	308	Secured Unsecured Total	$4,372,000.00 $2,323,000.00 $6,695,000.00
	Reason: Liabilities asserted in claim #309 are duplicative of liabilities asserted in claim #308.											
3	Atlantic Specialty Insurance Company c/o Torre, Lentz, Gamell, Gary & Rittmaster, LLP Attn: Kevin M. Gary & Steven H. Rittmaster 100 Jericho Quadrangle, Suite 309 Jericho, NY 11753-2702	10/31/25	25-16986 (MBK) DM Intermediate II Corporation	310	Secured Unsecured Total	$4,372,000.00 $2,323,000.00 $6,695,000.00	Atlantic Specialty Insurance Company c/o Torre, Lentz, Gamell, Gary & Rittmaster, LLP Attn: Kevin M. Gary & Steven H. Rittmaster 100 Jericho Quadrangle, Suite 309 Jericho, NY 11753-2702	10/31/25	25-16995 (MBK) Del Monte Foods, Inc.	308	Secured Unsecured Total	$4,372,000.00 $2,323,000.00 $6,695,000.00
	Reason: Liabilities asserted in claim #310 are duplicative of liabilities asserted in claim #308.											

Del Monte Foods Corporation II Inc, Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 3 - Substantively Duplicative Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
4	AVILES, EILEEN ADDRESS ON FILE	08/15/25	25-16995 (MBK) Del Monte Foods, Inc.	2695932	Unsecured	$50,000.00	AVILES, EILEEN ADDRESS ON FILE	12/03/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	2712187	Unsecured	$50,000.00
	Reason: Liabilities asserted in claim #2695932 are duplicative of liabilities asserted in claim #2712187.											
5	California Department of Tax and Fee Administration Attn: Jennifer Lu PO Box 942879 Sacramento, CA 94279-0029	08/26/25	25-16995 (MBK) Del Monte Foods, Inc.	119	Priority	$55,056.00	California Department of Tax and Fee Administration Attn: Jennifer Lu PO Box 942879 Sacramento, CA 94279-0029	08/26/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	117	Priority	$55,056.00
	Reason: Liabilities asserted in claim #119 are duplicative of liabilities asserted in claim #117.											
6	MOORE, JOHN ADDRESS ON FILE	08/15/25	25-16995 (MBK) Del Monte Foods, Inc.	2695985	Unsecured	$50,000.00	MOORE, JOHN ADDRESS ON FILE	12/03/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	2712149	Unsecured	$50,000.00
	Reason: Liabilities asserted in claim #2695985 are duplicative of liabilities asserted in claim #2712149.											
7	Sodexo Operations, LLC and its affiliates Attn: Joshua Morris, Commercial Litigation Attorney 915 Meeting Street, Suite 1500 North Bethesda, MD 20852	11/03/25	25-16995 (MBK) Del Monte Foods, Inc.	320	Unsecured	$417,849.11	Sodexo Operations, LLC and its affiliates Attn: Joshua Morris, Commercial Litigation Attorney 915 Meeting Street, Suite 1500 North Bethesda, MD 20852	11/03/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	319	Unsecured	$417,849.11
	Reason: Liabilities asserted in claim #320 are duplicative of liabilities asserted in claim #319.											

Del Monte Foods Corporation II Inc., Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 3 - Substantively Duplicative Claims

	CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLASSES	CLAIM AMOUNT
8	Steuben Foods Incorporated c/o Hodgson Russ LLP Attn: James C. Thoman, Esq; Robert Fluskey, Esq 140 Pearl Street, Suite 100 Buffalo, NY 14202	11/05/25	25-16995 (MBK) Del Monte Foods, Inc.	454	Unsecured	$4,382,742.21	Steuben Foods Incorporated c/o Hodgson Russ LLP Attn: James C. Thoman, Esq; Robert Fluskey, Esq 140 Pearl Street, Suite 100 Buffalo, NY 14202	11/05/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	453	Unsecured	$4,382,742.21
	Reason: Liabilities asserted in claim #454 are duplicative of liabilities asserted in claim #453.											
9	Universal Protection Services, LP (d/b/a Allied Universal Security Services) c/o Allied Universal Security Services Attn: Matthew Lambach, VP/Assoc. General Counsel 161 Washington Street, Suite 600 Conshohocken, PA 19428	11/25/25	25-16995 (MBK) Del Monte Foods, Inc.	496	Unsecured	$134,880.05	Universal Protection Services, LP (d/b/a Allied Universal Security Services) c/o Allied Universal Security Services Attn: Matthew Lambach, VP/Assoc. General Counsel 161 Washington Street, Suite 600 Conshohocken, PA 19428	11/25/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	495	Unsecured	$134,880.05
	Reason: Liabilities asserted in claim #496 are duplicative of liabilities asserted in claim #495.											
10	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	11/06/25	25-16995 (MBK) Del Monte Foods, Inc.	472	Priority	$8,519.80	Utah State Tax Commission Attn: Bankruptcy Unit 210 N 1950 W Salt Lake City, UT 84134-9000	11/06/25	25-16984 (MBK) Del Monte Foods Corporation II Inc.	468	Priority	$8,519.80
	Reason: Liabilities asserted in claim #472 are duplicative of liabilities asserted in claim #468.											
			TOTAL			**$18,493,165.17**				**TOTAL**		**$18,493,165.17**

Schedule 4

No Liability Claims

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 4 - No Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	Brazoria County, et al c/o Perdue, Brandon, Fielder, Collins & Mott, L.L.P. Attn: Michael J. Darlow 1235 North Loop West, Ste 600 Houston, TX 77008	11/14/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	485	$83,348.15
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
2	Brian Baldwin ADDRESS ON FILE	11/05/2025	25-16995 (MBK)	Del Monte Foods, Inc.	410	Undetermined*
	Reason: The Claim is contingent, unliquidated, and disputed, and fails to specify an amount asserted in the Proof of Claim, and otherwise fails to qualify the amount of alleged damages in the supplemental documentation. According to the Debtor's books and records there are no liabilities owed to the claimant.					
3	City of Houston Attn: Melissa E. Valdez 1235 N Loop W Ste 600 Houston, TX 77008	08/20/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	106	$90,887.68
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
4	Dallas County Attn: John Kendrick Turner 3500 Maple Ave Ste 800 Dallas, TX 75219	07/16/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	26	$204,178.14
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
5	Franchise Tax Board c/o Bankruptcy Section MS A340 Attn: Cathy Saechao PO Box 2952 Sacramento, CA 95812-2952	01/07/2026	25-16991 (MBK)	Del Monte Foods Holdings II, Inc.	522	$1,658.17
	Reason: Del Monte Foods Holdings II, Inc. does not have a taxable presence in the stated jurisdiction and according to the Debtor's books and records there are no liabilities related to the taxes asserted in the proof of claim.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 4 - No Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
6	Galveston County Attn: Tara L. Grundemeier PO Box 3064 Houston, TX 77258-3064	07/22/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	35	$24,499.83
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
7	JASON MORAN ADDRESS ON FILE	11/05/2025	25-16995 (MBK)	Del Monte Foods, Inc.	416	Undetermined*
	Reason: The Claim is contingent, unliquidated, and disputed, and fails to specify an amount asserted in the Proof of Claim, and otherwise fails to qualify the amount of alleged damages in the supplemental documentation. According to the Debtor's books and records there are no liabilities owed to the claimant.					
8	Lone Star College System Attn: Tara L. Grundemeier PO Box 3064 Houston, TX 77253-3064	07/22/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	36	$17,418.12
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
9	Lone Star College System c/o Linebarger Goggan Blair & Sampson LLP Attn: Tara L. Grundemeier PO Box 3064 Houston, TX 77253-3064	11/11/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	478	$18,675.89
	Reason: The Debtor is not liable for the tax obligation asserted in the Claim, which pertains to a separate and unrelated entity.					
10	Rhode Island Division of Taxation One Capitol Hill Providence, RI 02908	09/23/2025	25-16995 (MBK)	Del Monte Foods, Inc.	155	$886.15
	Reason: The Debtor is protected under Public Law 86-272 in Rhode Island and has no corporate income tax liability for the amounts asserted in the Claim.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 4 - No Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
11	Sharon Carmichael Reil ADDRESS ON FILE	10/27/2025	25-16995 (MBK)	Del Monte Foods, Inc.	261	Undetermined*
	Reason: The Claim is contingent, unliquidated, and disputed, and fails to specify an amount asserted in the Proof of Claim, and otherwise fails to qualify the amount of alleged damages in the supplemental documentation. According to the Debtor's books and records there are no liabilities owed to the claimant.					
					TOTAL	$441,552.13*

*Indicates claim contains unliquidated and/or undetermined amounts

Schedule 5

Unsubstantiated Claims

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	Abelardo Gonzalez Melena ADDRESS ON FILE	10/20/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	234	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
2	Angel Farias-Martinez ADDRESS ON FILE	12/22/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	514	$17,028.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
3	Angel Perez ADDRESS ON FILE	10/08/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	175	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
4	Arturo Ledesma Sosa ADDRESS ON FILE	10/19/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	226	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
5	Benjamin Saldana ADDRESS ON FILE	10/11/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	191	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
6	Bernabe Orejel ADDRESS ON FILE	10/07/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	165	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
7	Danny Gutierrez [Daniel E. Gutierrez] ADDRESS ON FILE	10/14/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	202	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
8	Dawn Garcia [Dawn R. Roman] ADDRESS ON FILE	11/05/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	464	$6,096.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
9	Deonta Scott ADDRESS ON FILE	11/03/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	332	$10,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
10	Ernesto Martinez ADDRESS ON FILE	11/03/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	325	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
11	Eunice Brown ADDRESS ON FILE	10/10/2025	25-16995 (MBK)	Del Monte Foods, Inc.	190	$3,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
12	Gerarda Velazquez Martinez ADDRESS ON FILE	10/20/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	229	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
13	Gregorio Gaona ADDRESS ON FILE	10/20/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	230	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
14	Guadalupe Wiese ADDRESS ON FILE	10/14/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	204	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
15	Janice Carr ADDRESS ON FILE	11/06/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	467	$30,456.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
16	Jason W. Rowland ADDRESS ON FILE	12/17/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	512	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
17	Joana Campos ADDRESS ON FILE	11/01/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	312	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
18	Jorge Cuevas ADDRESS ON FILE	10/11/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	192	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
19	Joseph Trancoso ADDRESS ON FILE	10/14/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	201	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
20	Juan Sepeda ADDRESS ON FILE	10/17/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	223	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
21	Julia Cruz ADDRESS ON FILE	11/21/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	492	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
22	Julian Ortiz ADDRESS ON FILE	10/11/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	194	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
23	Juventina Rodriguez ADDRESS ON FILE	11/01/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	313	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
24	Leticia Rosas ADDRESS ON FILE	11/10/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	475	$100.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
25	Lidia Piceno ADDRESS ON FILE	10/10/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	186	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
26	Lilianna Piceno Cortez ADDRESS ON FILE	11/03/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	326	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
27	Lourdes VIgil ADDRESS ON FILE	02/23/2026	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	531	$100,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
28	Magda Ramirez ADDRESS ON FILE	11/04/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	356	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
29	Malcom Martin ADDRESS ON FILE	10/13/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	198	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
30	Maria Ramos ADDRESS ON FILE	11/04/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	376	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
31	Maria Rodriguez ADDRESS ON FILE	10/15/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	213	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
32	Martin Barocio Silva ADDRESS ON FILE	10/30/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	297	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
33	Morris Gross ADDRESS ON FILE	10/29/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	282	$95,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
34	Nieves Rodriguez Diaz ADDRESS ON FILE	12/29/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	517	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
35	Pandora Walton ADDRESS ON FILE	10/21/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	237	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
36	Refugio Vazquez ADDRESS ON FILE	10/29/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	289	$19,833.23
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
37	Reynaldo Ledezma ADDRESS ON FILE	12/08/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	507	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
38	Rogelio Duarte Quinones ADDRESS ON FILE	09/05/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	127	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
39	Rosa De VIlleda ADDRESS ON FILE	10/30/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	298	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
40	Salvador Espinosa [Salvador Espinosa Ramos] ADDRESS ON FILE	11/24/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	493	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
41	Sofia Gentry ADDRESS ON FILE	10/22/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	243	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
42	Teresa Santiago ADDRESS ON FILE	11/18/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	488	$22,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					

*Indicates claim contains unliquidated and/or undetermined amounts

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 5 - Unsubstantiated Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
43	Usbaldo Solorio ADDRESS ON FILE	10/07/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	166	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
44	Virginia Orona ADDRESS ON FILE	10/17/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	225	Undetermined*
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
45	Wesley Jayson [Jayson Wesley] ADDRESS ON FILE	10/16/2025	25-16984 (MBK)	Del Monte Foods Corporation II Inc.	218	$35,000.00
	Reason: Claim lacks sufficient documentation from which to determine whether any liability exists.					
					TOTAL	$338,513.23*

*Indicates claim contains unliquidated and/or undetermined amounts

Schedule 6

Reclassified Claims

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 6 - Reclassified Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS		
	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Arbon Equipment Corporation 195 S Rite-Hite Way Milwaukee, WI 53204	181	Del Monte Foods Corporation II Inc.	Priority	$100,821.20	Del Monte Foods Corporation II Inc.	Unsecured	$100,821.20
	Reason: Modified priority reflects that claimant asserted priority under 11 U.S.C. § 507(a); however, claimant's asserted liabilities arise from goods and services rendered, which are not eligible for priority treatment under § 507(a).							
2	Cabri Group 7402 S 186th St. Omaha, NE 68136	37	Del Monte Foods Corporation II Inc.	Admin	$121,832.50	Del Monte Foods Corporation II Inc.	Unsecured	$121,832.50
	Reason: Modified priority reflects that, although administrative expense priority was asserted under 11 U.S.C. § 503(b), the Debtor's accounting records and/or documentation filed with the proof of claim show that the underlying obligation arose prior to the Petition Date. As such, the claim is ineligible for administrative expense priority status.							
3	Clipper Controls Inc. 660 Bercut Drive Sacramento, CA 95811	28	Del Monte Foods Corporation II Inc. Del Monte Foods Corporation II Inc.	Priority Unsecured	$50.68 $659.00	Del Monte Foods Corporation II Inc.	Unsecured	$709.68
				Subtotal	$709.68			
	Reason: Modified priority reflects that claimant asserted priority under 11 U.S.C. § 507(a)(8); however, claimant is not a governmental unit and is therefore not entitled to priority treatment under § 507(a)(8).							
4	Excelsior Attn: Kyle King 7701 Lindsey Rd. Little Rock, AR 72206	121	Del Monte Foods Corporation II Inc. Del Monte Foods Corporation II Inc.	503(b)(9) Unsecured	$115,609.07 $32,209.39	Del Monte Foods Corporation II Inc.	Unsecured	$147,818.46
				Subtotal	$147,818.46			
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from services rendered, which are not eligible for priority treatment under § 503(b)(9).							
5	Generous Insights 1301 S. Jefferson Springfield, MO 65807	209	Del Monte Foods Corporation II Inc.	Priority	$3,400.00	Del Monte Foods Corporation II Inc.	Unsecured	$3,400.00
	Reason: Modified priority reflects that, although priority was asserted under 11 U.S.C § 507(a), the Debtor's accounting records and/or documentation filed with the proof of claim show no basis for such priority status. As such, the claim is ineligible for § 507(a) priority status.							

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 6 - Reclassified Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS		
	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
6	Hotsy Pacific [Pacific Bay Equipment] PO Box 4139 Modesto, CA 95352	208	Del Monte Foods Corporation II Inc. Del Monte Foods Corporation II Inc. Subtotal	503(b)(9) Unsecured	$221.40 $783.64 $1,005.04	Del Monte Foods Corporation II Inc.	Unsecured	$1,005.04
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from goods that were received outside of the proscribed 20-day receipt period under 11 U.S.C. § 503(b)(9) and thus not entitled to administrative priority.							
7	Industrial Waste & Salvage [Orange Avenue Disposal] PO Box 446 Fresno, CA 93709	120	Del Monte Foods, Inc.	503(b)(9)	$7,007.69	Del Monte Foods, Inc.	Unsecured	$7,007.69
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from services rendered, which are not eligible for priority treatment under § 503(b)(9).							
8	Molenaar USA LLC c/o Chapmand and Cutler Attn: Stephen Tetro 320 S. Canal Street Chicago, IL 60606	293	Del Monte Foods, Inc.	Admin	$393,630.12	Del Monte Foods, Inc.	Unsecured	$393,630.12
	Reason: Modified priority reflects that, although administrative expense priority was asserted under 11 U.S.C. § 503(b), the Debtor's accounting records and/or documentation filed with the proof of claim show that the underlying obligation arose prior to the Petition Date. As such, the claim is ineligible for administrative expense priority status.							
9	Pacwest Security Services 3303 Harbor Blvd A-103 Costa Mesa, CA 92626	161	Del Monte Foods Corporation II Inc. Del Monte Foods Corporation II Inc. Subtotal	Priority Unsecured	$17,150.00 $46,022.54 $63,172.54	Del Monte Foods Corporation II Inc.	Unsecured	$63,172.54
	Reason: Modified priority reflects that claimant asserted priority under 11 U.S.C. § 507(a)(4); however, claimant is not an employee, nor has claimant asserted that it is an individual or corporation with a single employee acting as an independent contractor earning greater than 75% of its income from the sale of goods or services in the ordinary course of the Debtors' business. Claimant is therefore not entitled to priority treatment under § 507(a)(4).							

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 6 - Reclassified Claims

				ASSERTED CLAIMS			MODIFIED CLAIMS		
	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
10	Quality Scaffolding Inc PO Box 306 Oakdale, CA 95361	211	Del Monte Foods Corporation II Inc.	503(b)(9)	$2,400.00	Del Monte Foods Corporation II Inc.	Unsecured	$2,400.00
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from services rendered, which are not eligible for priority treatment under § 503(b)(9).							
11	Rock Solid UK Ltd dba Nuqleous 201 S Main St. Bentonville, AR 72712	244	Del Monte Foods, Inc.	503(b)(9)	$24,125.36	Del Monte Foods, Inc.	Unsecured	$24,125.36
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from goods that were received outside of the proscribed 20-day receipt period under 11 U.S.C. § 503(b)(9) and thus not entitled to administrative priority.							
12	Sherrie Deguzman ADDRESS ON FILE	5	Del Monte Foods Corporation II Inc. Del Monte Foods Corporation II Inc.	503(b)(9) Priority	$4,467.64 $9,152.95	Del Monte Foods Corporation II Inc.	Unsecured	$13,620.59
				Subtotal	$13,620.59			
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9) and priority under 11 U.S.C. § 507(a)(4); however, claimant's asserted liabilities arise from services rendered, which are not eligible for priority treatment under § 503(b)(9), and claimant is not an employee or a qualifying independent contractor earning greater than 75% of its income from the sale of goods or services in the ordinary course of the Debtors' business, and is therefore not entitled to priority treatment under § 507(a)(4).							
13	Tipo Entertainment, Inc d/b/a Mikmak 110 Greene St Ste 9D New York, NY 10012-3836	247	Del Monte Foods Corporation II Inc.	503(b)(9)	$15,866.67	Del Monte Foods Corporation II Inc.	Unsecured	$15,866.67
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from goods that were received outside of the proscribed 20-day receipt period under 11 U.S.C. § 503(b)(9) and thus not entitled to administrative priority.							

Del Monte Foods Corporation II Inc. Case No. 25-16984 (MBK)
First Omnibus Objection
Ex. 6 - Reclassified Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS		
	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
14	Western Oilfields Supply Co. d/b/a Rain for Rent 5101 Office Park Dr. Bakersfield, CA 93309	182	Del Monte Foods Corporation II Inc.	Secured	$20,191.52	Del Monte Foods Corporation II Inc.	Unsecured	$20,191.52
	Reason: Modified priority reflects that, although secured priority asserted, the documentation filed with the proof of claim the proof of claim lacks sufficient evidence and supporting documentation to substantiate the secured nature of the claim.							
15	xAd, Inc. [GroundTruth] Attn: Nancy Cacciola One World Trade Center 60th FL New York, NY 10007	29	Del Monte Foods Corporation II Inc.	503(b)(9)	$16,348.44	Del Monte Foods Corporation II Inc.	Unsecured	$16,348.44
	Reason: Modified priority reflects that claimant asserted administrative priority under 11 U.S.C. § 503(b)(9); however, claimant's asserted liabilities arise from goods that were received outside of the proscribed 20-day receipt period under 11 U.S.C. § 503(b)(9) and thus not entitled to administrative priority.							
			TOTAL		$931,949.81	TOTAL		$931,949.81

EXHIBIT B

Behnke Declaration

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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

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

DECLARATION OF THOMAS BEHNKE IN SUPPORT OF THE DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS

I, Thomas Behnke, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, belief, and information:

1. I am Managing Director of Alvarez & Marsal North America, LLC ("**A&M**"). A&M has been retained in these Chapter 11 Cases to provide the Debtors, among other services, with a chief restructuring officer and certain additional support personnel pursuant to the *Order (I) Authorizing the Debtors to (A) Retain Alvarez & Marsal North America, LLC to Provide a CRO and Certain Additional Personnel, and (B) Designate Jonathan Goulding as Chief*

[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' 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.

Restructuring Officer for the Debtors, in Each Case, Effective as of the Petition Date, (II) Waiving Certain Timekeeping Requirements, and (III) Granting Related Relief [Docket No. 311].

2. I submit this declaration (this "**Declaration**") in support of the *Debtors' First Omnibus Objection to Certain Claims* (the "**Omnibus Objection**")[2] filed contemporaneously herewith. I am over the age of 18 competent to testify and authorized to submit the Declaration. on behalf of the Debtors.

3. A&M has been assisting the Debtors in administering these Chapter 11 Cases and winding down the Debtors' estates. Through A&M's engagement and participation in these Chapter 11 Cases, I have become generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Debtors' liabilities and amounts thereof owed to their creditors as of the Petition Date.

4. I have read the Debtors' Omnibus Objection and am, directly or indirectly through the Debtors' advisors and personnel, familiar with the information contained therein and the Schedules attached to the Proposed Order filed with the Omnibus Objection.

5. In preparing this Declaration, I reviewed the claims register maintained by the Debtors' claims and noticing agent, Stretto, Inc., which contains a record of all parties that have filed proofs of claim in connection with these Chapter 11 Cases. Additionally, I, or other employees of A&M and/or the Debtors working with me or under my supervision, or the Debtors' other advisors have reviewed each of the Claims that is the subject of the Omnibus Objection.

6. Every matter set forth herein is based on (a) my personal knowledge of the Debtors' operations and finances, (b) my review of the Claims and claims register, relevant

[2] Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Omnibus Objection.

documents and information received from other members of A&M, the Debtors, or the Debtors' other advisors, (c) my experience and knowledge of the claims process in these Chapter 11 Cases, (d) my understanding based on information obtained from the Debtors' books and records or otherwise supplied to me at the Debtors' request, and/or (e) as to matters involving bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Debtors. If called upon to testify, I could and would testify competently to the facts set forth herein.

7. I have read and reviewed the Omnibus Objection, including the information set forth on **Schedules 1**, **2**, **3**, **4**, **5**, and **6** to the Proposed Order, and I am familiar with the information contained in those documents. To the best of my knowledge, information and belief, the information that is contained in the Omnibus Objection is true and correct.

8. I, and/or one or more individuals working for the Debtors, including members of A&M, have reviewed the Debtors' books and records and the Claims set forth in the Schedules attached to the Proposed Order, together with any supporting documentation filed therewith, and following reasonable efforts to research the Claims in the Debtors' books and records, the Debtors have determined that:

(a) each of the Superseded Claims listed on **Schedule 1** to the Proposed Order should be disallowed and expunged in its entirety as being superseded by the corresponding Surviving Claim as set forth in **Schedule 1**;

(b) each of the Exact Duplicative Claims listed on **Schedule 2** to the Proposed Order should be disallowed and expunged in its entirety as being asserted in an identical amount against the same Debtor entity as the corresponding Surviving Claim set forth in **Schedule 2**;

(c) each of the Substantively Duplicative Claims listed on **Schedule 3** to the Proposed Order should be disallowed and expunged in its entirety because, while asserted against different Debtor entities, each such Claim has asserted in an identical amount and arises from the same transaction or obligation as the corresponding Surviving Claim set forth in **Schedule 3**;

(d) each of the No Liability Claims listed on **Schedule 4** to the Proposed Order should be disallowed and expunged in its entirety as the Debtors are not legally liable for such Claims for the reasons set forth in the Omnibus Objection and **Schedule 4**;

(e) each of the Unsubstantiated Claims listed on **Schedule 5** of the Proposed Order should be disallowed and expunged in its entirety because the supporting documentation is insufficient to establish the validity, amount, or nature of the asserted liability, as more fully set forth in the Omnibus Objection and **Schedule 5**; and

(f) the Reclassified Claims listed on **Schedule 6** to the Proposed Order should be reclassified as general unsecured claims rather than the priority, administrative and/or secured status asserted by such Claims for the reasons and the manner as set forth in the Omnibus Objection and **Schedule 6**.

9. Failure to disallow and expunge the Claims listed on **Schedules 1 – 5**, and to reclassify and/or modify the Claims listed on **Schedule 6** to the Proposed Order, could result in the applicable claimants receiving a recovery in these Chapter 11 Cases to which they are not entitled and to the detriment of other creditors. Moreover, the disallowance and expungement, or reclassification, sought in the Omnibus Objection will enable the Claims Register to more accurately reflect the claims asserted against the Debtors' estates and will facilitate the claims reconciliation and distribution process under the Plan. Accordingly, I believe that the relief is necessary and appropriate, and that the Court should grant the relief requested in the Omnibus Objection.

* * * * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: May 28, 2026

/s/ Thomas Behnke
Thomas Behnke
Managing Director
Alvarez & Marsal North America, LLC