IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
CHAPARRAL ENERGY, INC., et al., 1)	Case No. 20-11947 (MFW)
Debtors.)	(Jointly Administered)
)	

NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON SEPTEMBER 14, 2020 AT 2:00 P.M. (ET)

AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THE HEARING HAS BEEN CANCELLED WITH PERMISSION FROM THE COURT

I. **RESOLVED MATTERS:**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Their Prepetition Insurance Obligations, (B) Pay Their Prepetition Bonding Obligations, (C) Maintain Their Postpetition Insurance Coverage, and (D) Maintain Their Bonding Program, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Docket No. 4 – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

- Informal comments from Chubb Group ("Chubb") A.
- Informal comments from U.S. Specialty Insurance Company (Tokio В. Marine)



RLF1 23984668v.1

The Debtors in these cases, along with the last four digits (or five digits, in cases in which multiple Debtors have the same last four digits) of each Debtor's federal tax identification number, are: CEI Acquisition, L.L.C. (1817); CEI Pipeline, L.L.C. (6877); Chaparral Biofuels, L.L.C. (1066); Chaparral CO2, L.L.C. (1656); Chaparral Energy, Inc. (90941); Chaparral Energy, L.L.C. (20941); Chaparral Exploration, L.L.C. (1968); Chaparral Real Estate, L.L.C. (1655); Chaparral Resources, L.L.C. (1710); Charles Energy, L.L.C. (3750); Chestnut Energy, L.L.C. (9730); Green Country Supply, Inc. (2723); Roadrunner Drilling, L.L.C. (2399); and Trabajo Energy, L.L.C. (9753). The Debtors' address is 701 Cedar Lake Boulevard, Oklahoma City, OK 73114.

Amended items appear in bold.

Related Documents:

- Interim Order (I) Authorizing Debtors to (A) Pay Their Prepetition Insurance Obligations, (B) Pay Their Prepetition Bonding Obligations, and (C) Maintain Their Postpetition Insurance Coverage, (D) Maintain Their Bonding Program, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Docket No. 76 – entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing Debtors to (A) Pay Their Prepetition Insurance Obligations, (B) Pay Their Prepetition Bonding Obligations, and (C) Maintain Their Postpetition Insurance Coverage, (D) Maintain Their Bonding Program, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 96 filed August 18, 2020]
- iii. Certification of Counsel Regarding Final Order (I) Authorizing Debtors to (A) Pay Their Prepetition Insurance Obligations, (B) Pay Their Prepetition Bonding Obligations, (C) Maintain Their Postpetition Insurance Coverage, and (D) Maintain Their Bonding Program, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Docket No. 144 filed September 9, 2020]
- iv. Final Order (I) Authorizing Debtors to (A) Pay Their Prepetition Insurance Obligations, (B) Pay Their Prepetition Bonding Obligations, (C) Maintain Their Postpetition Insurance Coverage, and (D) Maintain Their Bonding Program, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Docket No. 159 entered September 10, 2020]

Status: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. <u>5</u> – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

Related Documents:

i. Interim Order Under 11 U.S.C. Sections 105(a), 363(b), 506(a), 507(a)(8) and 541 and Fed. R. Bankr. P. 6003 (I) Authorizing the Payment of

- Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 77 entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order Under 11 U.S.C. Sections 105(a), 363(b), 506(a), 507(a)(8) and 541 and Fed. R. Bankr. P. 6003 (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 99 filed August 18, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. <u>149</u> filed September 9, 2020]
- iv. Final Order Under 11 U.S.C. §§ 105(a), 363(b), 506(a), 507(a)(8) and 541 and Fed. R. Bankr. P. 6003 (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. <u>164</u> entered September 10, 2020]

3. Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance, and (IV) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. <u>6</u> – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Interim Order (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving Debtors Proposed Form of Adequate Assurance of Payment to Utility Companies, (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance, and (IV) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. <u>78</u> entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving Debtors Proposed Form of Adequate Assurance of Payment to Utility Companies,

- (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance, and (IV) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers; and (B) Final Hearing Thereon [Docket No. <u>100</u> filed August 18, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance, and (IV) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. 150 filed September 9, 2020]
- iv. Final Order (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving Debtors Proposed Form of Adequate Assurance of Payment to Utility Companies, (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance, and (IV) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. 165 entered September 10, 2020]

4. Motion of Debtors for Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Authorizing Continuation of Intercompany Transactions, and (IV) Authorizing Continued Use of Credit Cards [Docket No. 7 – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Interim Order (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Authorizing Continuation of Intercompany Transactions, and (IV) Authorizing Continued Use of Credit Cards [Docket No. <u>80</u> entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing

- Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Authorizing Continuation of Intercompany Transactions, and (IV) Authorizing Continued Use of Credit Cards; and (B) Final Hearing Thereon [Docket No. <u>93</u> filed August 18, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtors for Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Authorizing Continuation of Intercompany Transactions, and (IV) Authorizing Continued Use of Credit Cards [Docket No. 151 filed September 9, 2020]
- iv. Final Order (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Authorizing Continuation of Intercompany Transactions, and (IV) Authorizing Continued Use of Credit Cards [Docket No. <u>166</u> entered September 10, 2020]
- Status: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.
- 5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Workforce Obligations, (B) Continue Workforce Programs and Pay Related Administrative Obligations, and (C) Pay Withholding and Payroll Related Taxes, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. <u>8</u> filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from Chubb

Related Documents:

i. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Workforce Obligations, (B) Continue Workforce Programs and Pay Related Administrative Obligations, (C) Pay Withholding and Payroll Related Taxes, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 81 – entered August 18, 2020]

- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Workforce Obligations, (B) Continue Workforce Programs and Pay Related Administrative Obligations, (C) Pay Withholding and Payroll Related Taxes, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 101 filed August 18, 2020]
- iii. Certification of Counsel Regarding Order (I) Authorizing the Debtors to (A) Pay Prepetition Workforce Obligations, (B) Continue Workforce Programs and Pay Related Administrative Obligations, (C) Pay Withholding and Payroll Related Taxes, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 158 filed September 9, 2020]
- iv. Order (I) Authorizing the Debtors to (A) Pay Prepetition Workforce Obligations, (B) Continue Workforce Programs and Pay Related Administrative Obligations, (C) Pay Withholding and Payroll Related Taxes, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 173 entered September 10, 2020]

6. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Trade Creditors, (II) Confirming Administrative Expense Priority Status of Debtors' Undisputed Obligations for Postpetition Delivery of Goods and Services, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. 9 – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- Interim Order (I) Authorizing Payment of Prepetition Claims of Trade Creditors, (II) Confirming Administrative Expense Priority Status of Debtors' Undisputed Obligations for Postpetition Delivery of Goods and Services, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfer [Docket No. <u>83</u> – entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing Payment of Prepetition Claims of Trade Creditors, (II) Confirming Administrative

Expense Priority Status of Debtors' Undisputed Obligations for Postpetition Delivery of Goods and Services, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfer; and (B) Final Hearing Thereon [Docket No. 92 – filed August 18, 2020]

- iii. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Trade Creditors, (II) Confirming Administrative Expense Priority Status of Debtors' Undisputed Obligations for Postpetition Delivery of Goods and Services, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers [Docket No. <u>152</u> filed September 9, 2020]
- iv. Final Order (I) Authorizing Payment of Prepetition Claims of Trade Creditors, (II) Confirming Administrative Expense Priority Status of Debtors' Undisputed Obligations for Postpetition Delivery of Goods and Services, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfer [Docket No. <u>167</u> entered September 10, 2020]

Status: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

7. Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>10</u> – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>84</u> entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates; and (B) Final Hearing Thereon [Docket No. <u>97</u> filed August 18, 2020]
- iii. Notice of Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>105</u> filed August 19, 2020]

- iv. Notice of Filing of Certain Revised Exhibits to Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>106</u> filed August 20, 2020]
- v. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>153</u> filed September 9, 2020]
- vi. Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. <u>168</u> entered September 10, 2020]

8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) Royalty Payments, (B) Working Interest Disbursements, (C) Non– Royalty Lease Payments, (D) Operating Expenses, and (E) Joint Interest Billings, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 11 – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Interim Order (I) Authorizing the Debtors to Pay (A) Royalty Payments,
 (B) Working Interest Disbursements, (C) Non- Royalty Lease Payments,
 (D) Operating Expenses, and (E) Joint Interest Billings, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 82 entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Debtors to Pay (A) Royalty Payments, (B) Working Interest Disbursements, (C) Non-Royalty Lease Payments, (D) Operating Expenses, and (E) Joint Interest Billings, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 98 filed August 18, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) Royalty Payments, (B) Working Interest Disbursements, (C) Non– Royalty Lease

- Payments, (D) Operating Expenses, and (E) Joint Interest Billings, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 154 filed September 9, 2020]
- iv. Final Order (I) Authorizing the Debtors to Pay (A) Royalty Payments, (B) Working Interest Disbursements, (C) Non– Royalty Lease Payments, (D) Operating Expenses, and (E) Joint Interest Billings, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Fund Transfers, and (III) Granting Related Relief [Docket No. 169 entered September 10, 2020]

9. Motion of the Debtors for Entry of Emergency, Interim, and Final Orders Authorizing the Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business [Docket No. 12 – filed August 16, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Emergency Order Authorizing Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business [Docket No. <u>61</u> entered August 17, 2020]
- ii. Interim Order Authorizing Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business [Docket No. <u>79</u>– entered August 18, 2020]
- iii. Notice of (A) Entry of Interim Order Authorizing Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business; and (B) Final Hearing Thereon [Docket No. 102 filed August 18, 2020]
- iv. Certificate of No Objection Regarding Motion of the Debtors for Entry of Emergency, Interim, and Final Orders Authorizing the Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business [Docket No. <u>155</u> filed September 9, 2020]
- v. Final Order Authorizing Debtors to Maintain Their Fuel Card Program in the Ordinary Course of Business [Docket No. <u>170</u> entered September 10, 2020]

10. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedging Arrangements, (II) Granting Liens and Superpriority Administrative Expense Claims, and (III) Granting Related Relief [Docket No. 24 – filed August 17, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedging Arrangements, (II) Granting Liens and Superpriority Administrative Expense Claims, and (III) Granting Related Relief [Docket No. 86 entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedging Arrangements, (II) Granting Liens and Superpriority Administrative Expense Claims, and (III) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 95 filed August 18, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedging Arrangements, (II) Granting Liens and Superpriority Administrative Expense Claims, and (III) Granting Related Relief [Docket No. 156 filed September 9, 2020]
- iv. Final Interim Order (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedging Arrangements, (II) Granting Liens and Superpriority Administrative Expense Claims, and (III) Granting Related Relief [Docket No. <u>171</u> entered September 10, 2020]

<u>Status</u>: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

11. Application of Debtors for Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 112 – filed August 24, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the Office of the United States Trustee (the "U.S. Trustee")

Related Documents:

- i. Certification of Counsel Regarding Application of Debtors for Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. <u>145</u> filed September 9, 2020]
- ii. Order Approving Application of Debtors for Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. <u>160</u> entered September 10, 2020]

<u>Status</u>: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

12. Application of Debtors to Employ and Retain Richards, Layton & Finger, P.A. as Co– Counsel to the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Rule 2014– 1, *Nunc Pro Tunc* to the Petition Date [Docket No. 113 – filed August 24, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Regarding Application of Debtors to Employ and Retain Richards, Layton & Finger, P.A. as Co– Counsel to the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Rule 2014–1, *Nunc Pro Tunc* to the Petition Date [Docket No. <u>146</u> filed September 9, 2020]
- ii. Order Authorizing the Debtors to Employ and Retain Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Rule 2014-1, *Nunc Pro Tunc* to the Petition Date [Docket No. <u>161</u> entered September 10, 2020]

Status: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

13. Application of Debtors to Approve Employment and Retention of Opportune LLP as Restructuring Advisor Pursuant to Section 327(a) and 328(a) of the Bankruptcy Code, *Nunc Pro Tunc* to the Petition Date [Docket No. <u>114</u> – filed August 24, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Regarding Application of Debtors to Approve Employment and Retention of Opportune LLP as Restructuring Advisor Pursuant to Section 327(a) and 328(a) of the Bankruptcy Code, *Nunc Pro Tunc* to the Petition Date [Docket No. <u>147</u> filed September 9, 2020]
- ii. Order Approving Application of Debtors to Approve Employment and Retention of Opportune LLP as Restructuring Advisor Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, *Nunc Pro Tunc* to the Petition Date [Docket No. <u>162</u> entered September 10, 2020]

<u>Status</u>: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

14. Application of Debtors for Entry of an Order Authorizing Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 115 – filed August 24, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None.

- i. Certificate of No Objection Regarding Application of Debtors for Entry of an Order Authorizing Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective *Nunc Pro Tunc* to the Petition Date [Docket No. <u>157</u> filed September 9, 2020]
- ii. Order Authorizing Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective *Nunc Pro Tunc* to the Petition Date [Docket No. <u>172</u> entered September 10, 2020]

15. Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals *Nunc Pro Tunc* to the Petition Date [Docket No. <u>131</u> – filed August 31, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

- Certification of Counsel Regarding Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals *Nunc Pro Tunc* to the Petition Date [Docket No. <u>148</u> – filed September 9, 2020]
- ii. Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals *Nunc Pro Tunc* to the Petition Date [Docket No. <u>163</u> entered September 10, 2020]

<u>Status</u>: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

II. MATTERS WITH CERTIFICATION OF COUNSEL:

16. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 23 – filed August 17, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Limited Objection and Reservation of Rights of Certain Texas Taxing Entities to Motion of Debtors' to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Related to Docket no. 23) [Docket No. 141 – filed September 8, 2020]

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Use Cash Collateral,
 (II) Granting Adequate Protection, (III) Modifying the Automatic Stay,
 (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 85 entered August 18, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 94 filed August 18, 2020]
- iii. Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. <u>174</u> filed September 10, 2020]
- iv. Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. <u>180</u> entered September 10, 2020]

<u>Status</u>: On September 10, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

17. Application of Debtors for Authority to (I) Employ and Retain Rothschild & Co US Inc. and Intrepid Partners, LLC as Investment Bankers for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Waive Certain Information Disclosure Requirements [Docket No. <u>116</u> – filed August 24, 2020]

Objection / Response Deadline: September 8, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

 Supplemental Declaration of David R. Gehring in Support of the Application of Debtors for Authority to (I) Employ and Retain Rothschild & Co US Inc. and Intrepid Partners, LLC as Investment Bankers for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Waive Certain Information Disclosure Requirements [Docket No. <u>175</u> – filed September 10, 2020]

- ii. Certification of Counsel Regarding Application of Debtors for Authority to (I) Employ and Retain Rothschild & Co US Inc. and Intrepid Partners, LLC as Investment Bankers for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Waive Certain Information Disclosure Requirements [Docket No. <u>176</u> filed September 10, 2020]
- iii. Order Approving Application of Debtors for Authority to (I) Employ and Retain Rothschild & Co US Inc. and Intrepid Partners, LLC as Investment Bankers for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Waive Certain Information Disclosure Requirements [Docket No. <u>181</u> entered September 10, 2020]

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Dated: September 10, 2020 Wilmington, Delaware

/s/ Travis J. Cuomo

John H. Knight (No. 3848) Amanda R. Steele (No. 5530) Brendan J. Schlauch (No. 6115) Christopher M. De Lillo (No. 6355) Travis J. Cuomo (No. 6501) RICHARDS, LAYTON & FINGER, P.A. One Rodney Square 920 North King St. Wilmington, Delaware 19801 Telephone: 302–651–7700 Fax: 302-651-7701 E- mail: knight@rlf.com steele@rlf.com schlauch@rlf.com delillo@rlf.com cuomo@rlf.com

- and -

Damian S. Schaible (admitted *pro hac vice*)
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