

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
CHAPARRAL ENERGY, INC., <i>et al.</i> , ¹)	Case No. 20-11947 (MFW)
)	
Reorganized Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 305

CERTIFICATE OF NO OBJECTION REGARDING REORGANIZED DEBTORS’ MOTION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1452 AND FEDERAL RULES OF BANKRUPTCY PROCEDURE 9006(b) AND 9027 FURTHER EXTENDING THE DEADLINE BY WHICH THE REORGANIZED DEBTORS MAY REMOVE CIVIL ACTIONS

The undersigned hereby certifies that Chaparral Energy, Inc. and its affiliated reorganized debtors (the “**Reorganized Debtors**”) have received no answer, objection or any other responsive pleading with respect to the *Reorganized Debtors’ Motion for an Order Pursuant to 28 U.S.C. § 1452 and Federal Rules of Bankruptcy Procedure 9006(b) and 9027 Further Extending the Deadline by Which the Reorganized Debtors May Remove Civil Actions* [Docket No. 305] (the “**Motion**”) filed by the Reorganized Debtors with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on February 8, 2021. The undersigned further certifies that no answer, objection or other responsive pleading to the Motion has appeared on the Court’s docket in the above-captioned chapter 11 cases. Pursuant to the *Notice of Motion and*

¹ The Reorganized Debtors in these cases, along with the last four digits (or five digits, in cases in which multiple Reorganized Debtors have the same last four digits) of each Reorganized 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 Reorganized Debtors’ address is 701 Cedar Lake Boulevard, Oklahoma City, OK 73114.



Hearing filed with the Motion, any objection or response to the Motion was to be filed and served no later than February 22, 2021 at 4:00 p.m. (prevailing Eastern Time).

WHEREFORE, the Reorganized Debtors respectfully request that an order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: February 23, 2021
Wilmington, Delaware

/s/ Travis J. Cuomo
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Counsel for Reorganized Debtors

EXHIBIT A

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CHAPARRAL ENERGY, INC., <i>et al.</i> , ¹)	Case No. 20-11947 (MFW)
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Reorganized Debtors.)	(Jointly Administered)
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)	Re: Docket No. 305
)	

**ORDER FURTHER EXTENDING THE DEADLINE BY WHICH
THE REORGANIZED DEBTORS MAY REMOVE CIVIL ACTIONS**

Upon the motion (the “**Motion**”)² of the Reorganized Debtors for entry of an order pursuant to 28 U.S.C. § 1452 and Bankruptcy Rules 9006(b) and 9027 extending the Removal Deadline; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and venue being proper pursuant to 28 U.S.C. § 1409; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors and all other parties in interest; and the Reorganized Debtors having provided appropriate notice of the Motion and opportunity for a hearing on the Motion under the circumstances and no other or further notice needing be provided; and the Court having reviewed

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² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Removal Deadline is extended through and including May 17, 2021.
3. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
4. This Order is without prejudice to (a) any position the Reorganized Debtors may take on whether the injunctions under the Plan stay any given Civil Action pending against the Debtors; (b) the Reorganized Debtors' right to seek further extensions of the Removal Deadline; or (c) the rights of the 2016 Debtors in the Prior Bankruptcy Cases.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, enforcement or interpretation of this Order.