IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
EMERGE ENERGY SERVICES LP,	:	Case No. 19-11563 (KBO)
Reorganized Debtor.[1]	:	**Re: Docket No. 853**

CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE REORGANIZED DEBTOR FOR AN ORDER FURTHER EXTENDING PERIOD WITHIN WHICH THE REORGANIZED DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND GRANTING RELATED RELIEF

The undersigned hereby certifies as follows:

1. On June 9, 2020, the reorganized debtor in the above-captioned case (the "**Reorganized Debtor**") filed the *Motion of the Reorganized Debtor for an Order Further Extending Period Within Which the Reorganized Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure and Granting Related Relief* [Docket No. 853] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). A proposed form of order (the "**Proposed Order**") was attached as **Exhibit A** to the Motion.

2. As of the date hereof, the undersigned has reviewed the Court's docket in this case and certifies that no answer, objection, or other responsive pleading to the Motion has appeared thereon. In addition, the undersigned has not otherwise received any formal or

[1] The Reorganized Debtor in this case, along with the last four digits of each Reorganized Debtor's federal tax identification number, is Emerge Energy Services LP (2937). The Reorganized Debtors' address is 6500 West Freeway, Suite 800, Fort Worth, Texas 76116.

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informal responses or objections to the Motion. Pursuant to the *Notice of Motion and Hearing*, filed with the Motion, any objections or responses to the Motion were to be filed and served by no later than June 23, 2020 at 4:00 p.m. (Eastern Time).

[*Remainder of page intentionally left blank.*]

WHEREFORE, the Reorganized Debtor respectfully requests that the Proposed Order granting the relief requested in the Motion, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: June 24, 2020
Wilmington, Delaware

/s/ Travis J. Cuomo

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EXHIBIT 1

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
EMERGE ENERGY SERVICES LP,	:	Case No. 19-11563 (KBO)
Reorganized Debtor.[1]	:	

ORDER FURTHER EXTENDING PERIOD WITHIN WHICH THE REORGANIZED DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND GRANTING RELATED RELIEF

Upon the motion (the "**Motion**")[2] of the Reorganized Debtor for entry of an Order extending the time by which the Reorganized Debtor may file notices of removal under Bankruptcy Rule 9027 and granting related relief; the Court having reviewed the Motion and having considered the statements of counsel with respect to the Motion at a hearing (if any) before the Court; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 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 the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that

[1] The Reorganized Debtor in this case, along with the last four digits of the Reorganized Debtor's federal tax identification number, is Emerge Energy Services LP (2937). The Reorganized Debtor's address is 6500 West Freeway, Suite 800, Fort Worth, Texas 76116.

[2] Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this order, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.

2. The time periods provided under Bankruptcy Rules 9027(a)(2) and 9027(a)(3) within which the Reorganized Debtor may file notices of removal of any and all civil actions is extended to and including October 7, 2020, to the extent that the time period for filing any such notices of removal expires on or before such date.

3. The Reorganized Debtor is 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 Debtor may take on whether the injunctions under the Plan stay any given Civil Action pending against any Debtor or (b) the Reorganized Debtor's right to seek further extensions of the Removal Deadline.

5. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.