

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
: :
EMERGE ENERGY SERVICES LP, : Case No. 19-11563 (KBO)
: :
Reorganized Debtor.¹ : :
: :
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NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 13, 2021 AT 10:00 A.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 the Reorganized Debtor for an Order Further Extending Period Within Which 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. 1002](#); filed June 2, 2021]

Response/Objection Deadline: June 16, 2021 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of the Reorganized Debtor for an Order Further Extending Period Within Which 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. 1006](#); filed June 17, 2021]
- ii. Order Further Extending Period Within Which Reorganized Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the

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 **Amended agenda items appear in bold.**



Federal Rules of Bankruptcy Procedure and Granting Related Relief
[[Docket No. 1008](#); entered June 21, 2021]

Status: On June 21, 2021, the Court entered an order regarding this matter.
Accordingly, a hearing on this matter is no longer necessary.

2. Motion of the Reorganized Debtor for an Order Further Extending the Deadline for the Reorganized Debtor to Object to Claims and Old GP/LP Equity Interests and Granting Related Relief [[Docket No. 1003](#); filed June 2, 2021]

Response/Objection Deadline: June 16, 2021 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of the Reorganized Debtor for an Order Further Extending the Deadline for the Reorganized Debtor to Object to Claims and Old GP/LP Equity Interests and Granting Related Relief [[Docket No. 1007](#); filed June 17, 2021]
- ii. Order Further Extending the Deadline for the Reorganized Debtor to Object to Claims and Old GP/LP Equity Interests [[Docket No. 1009](#); entered June 21, 2021]

Status: On June 21, 2021, the Court entered an order regarding this matter.
Accordingly, a hearing on this matter is no longer necessary.

II. MATTER GOING FORWARD:

3. Reorganized Debtor' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 876](#); filed August 27, 2020]

Response/Objection Deadline: September 10, 2020 at 4:00 p.m. (ET);
extended to September 15, 2020 at 4:00 p.m. (ET) for TMT Solutions Inc.;
extended to September 24, 2020 at 4:00 p.m. (ET) for Engineered Software Products, Inc.

Responses/Objections Received:

- A. Pownall Services, LLC's Response to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 884](#); filed September 10, 2020]
- B. Response of Market and Johnson, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 885](#); filed September 10, 2020]

- C. Anchor Technical Services, LLC's Response to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 886](#); filed September 10, 2020]
- D. Response of A-1 Excavating, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 887](#); filed September 10, 2020]
- E. Response of Stout Excavating Group LLC to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 888](#); filed September 10, 2020]
- F. Response of Midwest Frac and Sands LLC to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 889](#); filed September 10, 2020]
- G. Response of RB Scott Company, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 892](#); filed September 14, 2020]
- H. TMT's Response to Debtor's Omnibus Objection to, or Motion to Reclassify, Claims [[Docket No. 893](#); filed September 15, 2020]
- I. Response of Engineered Software Products, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 900](#); filed September 24, 2020]

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 899](#); filed September 24, 2020]
- ii. Declaration of Daniel Gribbon Murphy Pursuant to 28 U.S.C. 1746 in Support of Response of Engineered Software Products, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims [[Docket No. 901](#); filed September 25, 2020]
- iii. Order Approving Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims (Midwest Frac Only) [[Docket No. 955](#); entered December 30, 2020]
- iv. Order Approving Reorganized Debtors' First (Substantive) Omnibus Objection to, or Motion to Reclassify, Purported Secured Claims (Dozer, H&K, B&B, Cooper, Endeco and Texas Crane Only) [[Docket No. 957](#); entered December 30, 2020]

- v. Reorganized Debtors' Reply to Response of Engineered Software Products, Inc. to Reorganized Debtors' First (Substantive) Omnibus Objection [[Docket No. 983](#); filed March 29, 2021]

Witness Information:

- a. Scott Waughtal, Fort Worth, Texas

Status: The Reorganized Debtor and Engineered Software Products, Inc. have reached a tentative settlement on this matter, and the Reorganized Debtor and the remaining objectors anticipate presenting a settlement of the remaining objections to the Court in the near future. As such, the hearing on this matter has been continued to July 29, 2021 at 3:00 p.m.

Dated: July 12, 2021
Wilmington, Delaware

/s/ Travis J. Cuomo

RICHARDS, LAYTON & FINGER, P.A.

John H. Knight (No. 3848)
Russell C. Silberglied (No. 3462)
Paul N. Heath (No. 3704)
Zachary I. Shapiro (No. 5103)
David T. Queroli (No. 6318)
Travis J. Cuomo (No. 6501)
One Rodney Square
920 North King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
E-mail: knight@rlf.com
silberglied@rlf.com
heath@rlf.com
shapiro@rlf.com
queroli@rlf.com
cuomo@rlf.com

- and -

LATHAM & WATKINS LLP

George A. Davis (admitted *pro hac vice*)
Keith A. Simon (admitted *pro hac vice*)
Hugh K. Murtagh (admitted *pro hac vice*)
Liza L. Burton (admitted *pro hac vice*)
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
E-mail: george.davis@lw.com
keith.simon@lw.com
hugh.murtagh@lw.com
liza.burton@lw.com

Counsel for the Reorganized Debtor