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. 1025**

CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE REORGANIZED DEBTOR FOR AN ORDER FURTHER EXTENDING THE DEADLINE FOR THE REORGANIZED DEBTOR TO OBJECT TO ADMINISTRATIVE CLAIMS AND GRANTING RELATED RELIEF

The undersigned hereby certifies as follows:

1. On August 13, 2021, the reorganized debtor in the above-captioned case (the "**Reorganized Debtor**") filed the *Motion of the Reorganized Debtor for an Order Further Extending the Deadline for the Reorganized Debtor to Object to Administrative Claims and Granting Related Relief* [Docket No. 1025] (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 informal responses or objections to the Motion. Pursuant to the *Notice of Motion and Hearing*,

[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 Debtor's address is 6500 West Freeway, Suite 800, Fort Worth, Texas 76116.

1911563210830000000000001

filed with the Motion, any objections or responses to the Motion were to be filed and served by no later than August 27, 2021 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: August 30, 2021
Wilmington, Delaware

/s/ Travis J. Cuomo

RICHARDS, LAYTON & FINGER, P.A.
John H. Knight (No. 3848)
Paul N. Heath (No. 3704)
Zachary I. Shapiro (No. 5103)
Brett M. Haywood (No. 6166)
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
heath@rlf.com
shapiro@rlf.com
haywood@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*)
885 Third Avenue
New York, New York 10022
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

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]	:	**Re: Docket No. 1025**

ORDER EXTENDING THE DEADLINE FOR THE REORGANIZED DEBTOR TO OBJECT TO ADMINISTRATIVE EXPENSE CLAIMS

Upon the motion (the "**Motion**")[2] of the Reorganized Debtor for entry of an Order further extending the time by which the Reorganized Debtor may object to Administrative Claims; and 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 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

[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.

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 Administrative Claims Objection Deadline is hereby extended through and including December 13, 2021.

3. This Order is without prejudice to the Reorganized Debtor's right to request additional extensions of the Administrative Claims Objection Deadline.

4. The Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.