

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

EMERGE ENERGY SERVICES LP, *et al.*,  
  
Debtors.<sup>1</sup>

SUPERIOR SILICA SANDS LLC, a Texas  
limited liability company,

Plaintiff,

vs.

IRON MOUNTAIN TRAP ROCK  
COMPANY, a Missouri corporation, and  
FRED WEBER, INC., a Delaware corporation.

Defendants.

Chapter 11

Case No. 19-11563 (KBO)

Jointly Administered

Adv. Proc. No. 20-51052 (TMH)

**Re: Adv. D.I. 61 & 80**

**PLAINTIFF'S REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 7007-3 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Plaintiff Superior Silica Sands LLC, by and through its undersigned counsel, hereby respectfully requests oral argument on (1) *Superior Silica Sands LLC's Supplemental Motion for Partial Summary Judgment on Third Claim for Relief for Breach of Contract* [Adv. D.I. 61]; and (2) *Iron Mountain Trap Rock Company and Fred Weber, Inc.'s Cross-Motion for Partial Summary Judgment* [Adv. D.I. 80]. Briefing on the motions is now complete.

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: EmERGE Energy Services LP (2937), EmERGE Energy Services GP LLC (4683), EmERGE Energy Services Operating LLC (2511), Superior Silica Sands LLC (9889), and EmERGE Energy Services Finance Corporation (9875). The Debtors' address is 5600 Clearfork Main Street, Suite 400, Fort Worth, Texas 76109.



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Dated: September 28, 2023

BAKER & HOSTETLER LLP

/s/ Jeffrey J. Lyons

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