

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

In re:)	Chapter 11
)	
EXTRACTION OIL & GAS, INC., <i>et al.</i> ,)	Case No. 20-11548 (CSS)
)	
Debtors.)	(Jointly Administered)
_____)	
)	
EXTRACTION OIL & GAS, INC.,)	
)	
Plaintiff,)	
)	
v.)	Adv. Pro. No. 20-50816 (CSS)
)	
GRAND MESA PIPELINE, LLC,)	
)	
Defendant.)	
)	

DEFENDANT’S MOTION FOR PERMISSIVE ABSTENTION

Defendant Grand Mesa Pipeline, LLC (“**Grand Mesa**”) through its undersigned counsel and pursuant to 28 U.S.C. § 1334(c)(1), hereby moves (the “**Motion**”) the Court for entry of an order permissively abstaining from this Adversary Proceeding.

The grounds for this Motion are set forth more fully in Grand Mesa’s Brief in Support of Defendant’s Motion for Abstention and Answering Brief in Opposition to Plaintiff’s Motion for Summary Judgment filed contemporaneously herewith.

WHEREFORE, Grand Mesa respectfully requests that the Court (i) grant the Motion, (ii) abstain from hearing and dismiss this Adversary Proceeding, and (iii) grant such other and further relief as the Court may deem just and proper.



Dated: September 17, 2020

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, DE 19801
Telephone: 302-661-7000
Facsimile: 302-661-7360
Email: melorod@gtlaw.com

and

Iskender H. Catto
Hal S. Shaftel
Ryan A. Wagner
Greenberg Traurig, LLP
MetLife Building
200 Park Avenue
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400
Email: cattoi@gtlaw.com
shaftelh@gtlaw.com
wagnerr@gtlaw.com

Counsel for Grand Mesa Pipeline, LLC