

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

In re:

EXTRACTION OIL & GAS, INC., *et al.*,¹

Debtors.

Bankruptcy Case No. 20-11548 (CSS)

(Jointly Administered)

ARB MIDSTREAM, LLC, AND
PLATTE RIVER MIDSTREAM, LLC,

Appellants,

v.

EXTRACTION OIL & GAS, INC.,

Appellee.

Civil Action No. 20-1745
(CFC)

**JOINT MOTION TO STAY PENDING EXECUTION OF
FINAL SETTLEMENT AGREEMENT**

Appellants ARB Midstream, LLC (“ARB”), and Platte River Midstream, LLC (“PRM”) (together, “Platte River”) and Appellee Extraction Oil & Gas, Inc. (“Extraction”) (collectively, the “Parties”) hereby notify the Court that they have reached a settlement and have executed a settlement term sheet. Accordingly, the Parties respectfully move (the “Joint Motion”) the Court to stay the above-captioned

¹ The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Extraction Oil & Gas, Inc. (3923); 7N, LLC (4912); 8 North, LLC (0904); Axis Exploration, LLC (8170); Extraction Finance Corp. (7117); Mountaintop Minerals, LLC (7256); Northwest Corridor Holdings, LLC (9353); Table Mountain Resources, LLC (5070); XOG Services, LLC (6915); and XTR Midstream, LLC (5624). The location of the Debtors’ principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.



appeal in this Court of an order of the U.S. Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) regarding enforcement of the automatic stay (Case No. 1:20-cv-1745-CFC) (the “Appeal”) pending execution of the Parties’ settlement agreement and its approval by the Bankruptcy Court. In support of this Joint Motion, the Parties state as follows:

1. On Tuesday, December 22, 2020, the Parties reached a settlement and signed a term sheet, pursuant to which they are preparing final settlement documents.

2. Upon execution of the final settlement documents, Appellants will dismiss the Appeal with prejudice.

3. The Parties believe that the final settlement documents will be negotiated, executed, and approved within the next two weeks.

4. Accordingly, to avoid unnecessary time and expense, the Parties request a stay of all applicable deadlines, including without limitation, any deadlines imposed by Fed. R. Bankr. P. 8009, and Court hearings, pending the filing of a notice of dismissal, or unless the Parties approach the Court for a status conference.

5. Granting this Joint Motion is within this Court’s powers pursuant to Fed. R. Bankr. P. 8028 and will further the interests of justice and conserve the Parties’ and the Court’s resources. No Party will be prejudiced by the granting of this Joint Motion.

WHEREFORE, the Parties respectfully request that the Court stay the Appeal pending the filing of a notice of dismissal, or unless the Parties approach the Court for a status conference. A proposed order is attached as Exhibit A.

DATED this 4th day of January, 2021.

/s/ Brett S. Turlington

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[PROPOSED] ORDER

WHEREAS, the Court having considered the Parties' Joint Motion to stay and the reasons set forth therein,

IT IS HEREBY ORDERED that the Joint Motion to stay is GRANTED. All deadlines in this case, including without limitation, any deadlines imposed by Fed.

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R. Bankr. P. 8009, are hereby STAYED pending the filing of a notice of dismissal, or unless the Parties approach the Court for a status conference.

SO ORDERED this ____ day of January, 2021.

THE HONORABLE COLM F. CONNOLLY
UNITED STATES DISTRICT JUDGE