

**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)

PLATTE RIVER MIDSTREAM, LLC
AND DJ SOUTH GATHERING, LLC,

Appellants,

v.

EXTRACTION OIL & GAS, INC.,

Appellee.

Civil Action No. 20-1457
(CFC)

PLATTE RIVER MIDSTREAM, LLC,
DJ SOUTH GATHERING, LLC,
AND PLATTE RIVER HOLDINGS,
LLC,

Appellants,

v.

EXTRACTION OIL & GAS, INC.,

Appellee.

Civil Action No. 20-1532
(CFC)

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.



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

Appellants Platte River Midstream, LLC (“PRM”), DJ South Gathering, LLC (“DJS”), and Platte River Holdings, LLC (“PRH”) (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 two above-captioned appeals in this Court of orders of the U.S. Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) directed to Platte River’s contracts with Extraction (Case Nos. 1:20-cv-1457 and 1:20-cv-1532) (collectively, the “Appeals”) 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 agreement and its approval by the Bankruptcy Court, Appellants will dismiss the Appeals with prejudice.
3. The Parties believe that the final settlement agreement 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 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 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 Appeals 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 26th day of December, 2020.

/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 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 December 2020.

THE HONORABLE COLM F. CONNOLLY
UNITED STATES DISTRICT JUDGE