IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:	Chapter 11
PARAGON OFFSHORE PLC (IN ADMINISTRATION),	: Case No. 16-10386 (CSS)
Debtor.	Re: D.I. 2231 Hearing Date: June 3, 2021, at 2:00 p.m.
	Objections Due: May 27, 2021 at 5:00 n m

NOTICE OF MOTION OF THE UNITED STATES TRUSTEE TO COMPEL FILING OF POST-CONFIRMATION QUARTERLY REPORTS AND PAYMENT OF STATUTORY FEES PURSUANT TO 28 U.S.C. § 1930(a)(6)

TO: Counsel for Paragon Offshore plc (in administration) and the Paragon litigation trust

PLEASE TAKE NOTICE that on May 12, 2021, Andrew R. Vara, the United States Trustee for Regions 3 & 9 (the "<u>U.S. Trustee</u>"), filed the Motion of the United States Trustee To Compel Filing of Post-Confirmation Quarterly Reports and Payment of Statutory Fees Pursuant to 28 U.S.C. § 1930(a)(6) (D.I. 2231) (the "<u>Motion</u>") in the above-captioned bankruptcy case in the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **June 3, 2021, at 2:00 p.m.** prevailing Eastern Time before the Honorable Christopher S. Sontchi, United States Chief Bankruptcy Judge for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that you are required to file a response to the Motion on or before May 27, 2021, at 5:00 p.m. prevailing Eastern Time. At the same time, you must also serve a copy of the response upon the U.S. Trustee's attorney:

Benjamin A. Hackman Trial Attorney United States Department of Justice Office of the United States Trustee J. Caleb Boggs Federal Building 844 King Street, Suite 2207, Lockbox 35 Wilmington, DE 19801 benjamin.a.hackman@usdoj.gov

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.



Dated: May 17, 2021 Wilmington, Delaware

By:

ANDREW R. VARA UNITED STATES TRUSTEE, REGIONS 3 & 9

By: /s/ Benjamin Hackman
Benjamin A. Hackman
Trial Attorney
United States Department of Justice
Office of the United States Trustee
J. Caleb Boggs Federal Building
844 King Street, Suite 2207, Lockbox 35
Wilmington, DE 19801
(302) 573-6491
(302) 573-6497 (fax)
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CERTIFICATE OF SERVICE

I certify that on May 17, 2021, I caused to be served a copy of the NOTICE OF MOTION OF THE UNITED STATES TRUSTEE TO COMPEL FILING OF POST-CONFIRMATION QUARTERLY REPORTS AND PAYMENT OF STATUTORY FEES PURSUANT TO 28 U.S.C. § 1930(a)(6) (D.I. 2231) in the above-entitled action via e-mail upon the following persons:

Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, New York 10153 Attn: Gary T. Holtzer, Esq. Telephone: (212) 310-8000 Email: gary.holtzer@weil.com

Weil, Gotshal & Manges LLP 700 Louisiana, Suite 700 Houston, TX 77002 Attn: Alfredo Perez Telephone: (713) 546-5000 alfredo.perez@weil.com

Richards, Layton & Finger, P.A. One Rodney Square 920 North King Street Wilmington, Delaware 19801 Attn: Mark D. Collins, Esq. Amanda R. Steele, Esq. Telephone: (302) 651-7700 Email: collins@rlf.com steele@rlf.com Pachulski Stang Ziehl & Jones LLP Laura Davis Jones Timothy P. Cairns 919 N. Market Street, 17th Floor P.O. Box 8705 Wilmington, DE 19899-8705 ljones@pszjlaw.com tcairns@pszjlaw.com

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Dated: May 17, 2021 Wilmington, Delaware By: /s/ Benjamin Hackman
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