

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: SANJEL (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50778 Chapter 15
In re: SANJEL CORPORATION, Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50784 Chapter 15
In re: SURETECH GROUP LTD., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50786 Chapter 15
In re: SANJEL ENERGY SERVICES (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50795 Chapter 15
In re: SURETECH COMPLETIONS (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50789 Chapter 15
In re: SANJEL CAPITAL (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50783 Chapter 15
In re: TERRACOR GROUP LTD., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50790 Chapter 15
In re: TERRACOR (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50791 Chapter 15
In re: TERRACOR RESOURCES (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50793 Chapter 15
In re: TERRACOR LOGISTICS (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50794 Chapter 15 Joint Administration Pending



**MOTION FOR EMERGENCY HEARING ON
EMERGENCY MOTION TO LIMIT SERVICE**

PricewaterhouseCoopers Inc. (the “*Monitor*”), in its capacity as the court appointed and authorized foreign representative (the “*Foreign Representative*”) of the above-captioned debtors (the “*Chapter 15 Debtors*”)¹ and the *Chapter 15 Debtors* hereby submit this *Motion for Emergency Hearing on Emergency Motion to Limit Service*, and respectfully state:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and (b) and section 1501 of title 11 of the United States Code (the “*Bankruptcy Code*”).
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1410.
3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
4. On April 4, 2016, the *Monitor*, in its capacity as the *Foreign Representative*, filed chapter 15 petitions on behalf of the *Chapter 15 Debtors*.
5. In conjunction with the Petitions, on April 4, 2016, the *Monitor*, among other things, filed the *Emergency Motion to Limit Service* (the “*Limited Service Motion*”).

RELIEF REQUESTED

6. The *Monitor* and the *Chapter 15 Debtors* respectfully request emergency consideration of the *Limited Service Motion*. As set forth more fully in the *Limited Service Motion*, granting the relief requested in the *Limited Service Motion* will, among other things, preserve valuable estate resources and will benefit the *Chapter 15 Debtors*, their estates and

¹ The debtors in these Chapter 15 cases are as follows: Sanjel Corporation (“Sanjel Corp.”), Suretech Group Ltd. (“Suretech”), Sanjel Energy Services (USA) Inc. (“Sanjel Energy”), Sanjel (USA) Inc. (“SUSA”), Suretech Completions (USA) Inc. (“Suretech USA”), Sanjel Capital (USA) Inc. (“Sanjel Capital”), Terracor Group Ltd. (“Terracor Group”), Terracor (USA) Inc. (“Terracor USA”), Terracor Resources (USA) Inc. (“Terracor Resources”) and Terracor Logistics (USA) Inc. (“Terracor Logistics”) (collectively, the “Chapter 15 Debtors”).

creditors, will promote the fair and efficient administration of these cross-border insolvencies and will result in the economic and appropriate use of the parties and the Court's resources.

PRAYER

The *Monitor* and the *Chapter 15 Debtors* respectfully request that the Court enter the Order granting the relief requested herein, substantially in the form attached hereto as **Exhibit A**, and schedule an emergency hearing on the *Limited Service Motion* on the 5th day of April, 2016 and grant such other and further relief to which they may be justly entitled.

Dated: April 4, 2016

Respectfully submitted,

DYKEMA COX SMITH

By: /s/ Deborah D. Williamson

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CERTIFICATE OF SERVICE

I certify a copy of the foregoing document will be served upon the persons entitled to notice by either U.S. First Class Mail, postage pre-paid, by electronic notification or by the Electronic Case Filing system for the United States Bankruptcy Court for the Western District of Texas and on the parties on the attached Initial Service List by U.S. First Class mail on or before April 4, 2016:

/s/ Deborah D. Williamson

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Exhibit “A”

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER GRANTING EMERGENCY HEARING ON
EMERGENCY MOTION TO LIMIT SERVICE**

On April 4, 2016, PricewaterhouseCoopers Inc. (the “**Monitor**”), in its capacity as the court appointed and authorized foreign representative of the above-captioned debtors (the “**Chapter 15 Debtors**”) filed the *Motion for Emergency Hearing on the Emergency Motion to Limit Service* (the “**Motion**”) in the above-captioned chapter 15 cases seeking an emergency hearing on the *Emergency Motion to Limit Service* (the “**Limited Service Motion**”). The Court finds that (a) it has jurisdiction over the matters raised in the *Motion* pursuant to 28 U.S.C. §§ 1334(a) and (b), and 1501(b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (c) an emergency hearing is in the best interests of the Debtors and their estates, creditors, and equity security holders and would promote the fair and efficient administration of these cross-border insolvencies and result in economic and appropriate use of the parties and the Court’s resources, (d) proper and adequate notice of the *Motion* and hearing thereon has been given and that no other or further notice is necessary, (e) the relief granted herein is necessary to avoid immediate

and irreparable harm to the Debtors' estates, and (f) good and sufficient cause exists for the granting of the relief requested in the *Motion*. It is therefore,

ORDERED that the hearing on the *Limited Service Motion* is scheduled for April 5, 2016 at 8:00 a.m. (Central Time). It is further

ORDERED that any person desiring to appear telephonically at the hearing should contact CourtCall at (866) 582-6878.

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