

**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 EXPEDITED HEARING ON EXPEDITED PETITION FOR RECOGNITION AS FOREIGN MAIN PROCEEDING PURSUANT TO SECTIONS 1515 AND 1517 OF THE UNITED STATES BANKRUPTCY CODE AND RELATED RELIEF

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 hereby submits this *Motion for Expedited Hearing on Expedited Petition for Recognition as Foreign Main Proceeding Pursuant to Sections 1515 and 1517 of the United States Bankruptcy Code and Related Relief*, and respectfully states:

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 (the “*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 *Expedited Petition for Recognition as Foreign Main Proceeding Pursuant to Sections 1515 and 1517 of the United States Bankruptcy Code and Related Relief* (the “*Petition for Recognition*”).²

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

² Capitalized terms not otherwise defined herein have the meanings set forth in the Petition for Recognition.

RELIEF REQUESTED

6. The *Monitor* respectfully requests an expedited hearing on the *Petition for Recognition*. As set forth more fully in the *Petition for Recognition*, expedited relief is appropriate because, *inter alia*, (a) the Chapter 15 Debtors are on an expedited schedule to market their assets as part of the Canadian Proceedings, (b) a meeting is currently scheduled for April 14, 2016 in regard to the Senior Bonds at which the holders of the Senior Bonds will be asked to vote on, among other things, instructing the Indenture Trustee to immediately begin exercising remedies against the Chapter 15 Debtors, a process the Monitor and the Chapter 15 Debtors believe will be detrimental to the Chapter 15 Debtors and other creditors, and (c) the Syndicate has sent the Enforcement Notice to the Chapter 15 Debtors which, under Canadian law, enables the Syndicate to begin enforcing remedies against the Chapter 15 Debtors. The Chapter 15 Debtors are particularly concerned that if enforcement actions are commenced by the Senior Bonds and/or the Syndicate (or other creditors), such actions could have a devastating effect on the sale process the Chapter 15 Debtors have been pursuing, and are in the process of completing.

7. Furthermore, section 1517 of the Bankruptcy Code provides that “[a] petition for recognition of a foreign proceeding shall be decided upon at the earliest possible time.” 11 U.S.C. § 1517(c). Accordingly, the Monitors respectfully submits that expedited hearing on the *Petition for Recognition* is appropriate under the circumstances.

PRAYER

The *Monitor* respectfully requests 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 *Petition for Recognition* on or before the 27th day of April, 2016 and grant such other and further relief to which the Monitor may be justly entitled.

Dated: April 4, 2016

Respectfully submitted,

DYKEMA COX SMITH

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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
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

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ORDER GRANTING EXPEDITED HEARING ON EXPEDITED PETITION FOR RECOGNITION AS FOREIGN MAIN PROCEEDING PURSUANT TO SECTIONS 1515 AND 1517 OF THE UNITED STATES BANKRUPTCY CODE AND RELATED RELIEF

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 Expedited Hearing on Expedited Petition for Recognition as Foreign Main Proceeding Pursuant to Sections 1515 and 1517 of the United States Code and Related Relief* (the “*Motion*”) in the above-captioned chapter 15 cases seeking an expedited hearing on the *Expedited Petition for Recognition as Foreign Main Proceeding Pursuant to Sections 1515 and 1517 of the United States Bankruptcy Code and Related Relief* (the “*Petition for Recognition*”). 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 Chapter 15 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 *Petition for Recognition* is scheduled for April _____, 2016 at ___ __.m. (Central Time). It is further

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

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