

**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 INTERIM HEARING ON
MOTION FOR AN ORDER (I) SPECIFICALLY RECOGNIZING CANADIAN COURT
ORDER AUTHORIZING DEBTORS TO BORROW UNDER A POST-PETITION
CREDIT FACILITY, (II) APPROVING LIENS ON ASSETS LOCATED IN THE
TERRITORIAL JURISDICTION OF THE UNITED STATES AND (III) GRANTING
ADEQUATE PROTECTION TO PREPETITION SECURED PARTIES**

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 Interim Hearing on Motion for an Order (I) Specifically Recognizing Canadian Court Order Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States and (III) Granting Adequate Protection to Prepetition Secured Parties*, 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)(P).
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* and the *Chapter 15 Debtors*, filed the *Motion for an Order (I) Specifically Recognizing Canadian Court Order*

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”).

*Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States and (III) Granting Adequate Protection to Prepetition Secured Parties (the “**Post-Petition Financing Motion**”).*

RELIEF REQUESTED

6. The *Monitor* and the *Chapter 15 Debtors* respectfully request emergency consideration of the *Post-Petition Financing Motion* on an interim basis. As set forth more fully in the *Post-Petition Financing Motion*, the interim relief requested in the *Post-Petition Financing Motion* is absolutely essential to the ongoing operations of the *Chapter 15 Debtors*, and without the requested relief the ongoing operations of the *Chapter 15 Debtors* will be immediately and irreparably harmed and their businesses severely and, perhaps, irrevocably disrupted.

7. Additionally, the Post-Petition Credit Agreement contains the following “Milestones” required by the Syndicate, the post-petition lender, recognizing the extremely challenging current environment in which the Chapter 15 Debtors are operating, their dire financial situation and the need to expeditiously resolve such issues through the CCAA and Chapter 15 cases:

Sanjel Milestones Timeline		
Section in "Milestones" Definition in Post-Petition Credit Agreement	Milestone	Deadline
(a)	U.S. Bankruptcy Court shall have entered U.S. TRO Order	Reasonable best efforts to obtain within 1 business day after date of the Initial Order, and in any event within 2 business days of date of the Initial Order.
(b)	U.S. Bankruptcy Court shall have entered Interim Post-Petition Financing Order	Reasonable best efforts to obtain within 3 business days after date of the Initial Order, and in any event within 4 business days of date of the Initial Order.
	Loan Parties have identified Alternative Restructuring Option, if any	April 11, 2016
(c)	Loan Parties shall have filed a Motion seeking Approval and Vesting Order (the "AVO") and Distribution Order	April 11, 2016
(d)	Loan Parties shall have filed a Motion seeking recognition by U.S. Bankruptcy Court of the AVO and Distribution Order	April 12, 2016
(e)	Canadian Court shall have issued the AVO and Distribution Order	Reasonable best efforts to obtain by April 25, 2016, and in any event prior to April 29, 2016.
(f)	U.S. Bankruptcy Court shall have entered Final Post-Petition Financing Order	Subject to the Bankruptcy Court's availability, 21 days after entry of the Interim U.S. Post-Petition Financing Order
(g)	U.S. Bankruptcy Court shall have entered Chapter 15 Recognition Order	April 29, 2016
(h)	U.S. Bankruptcy Court shall have issued an order recognizing the AVO and Distribution Order	Reasonable best efforts to obtain by May 9, 2016, and in any event prior to May 12, 2016.
(i)	Final APA Closing	May 16, 2016
	Maturity Date of Post-Petition Financing Facility	May 30, 2016

8. Thus, the *Monitor* and the *Chapter 15 Debtors* request that the Court, in coordination and comity with the Canadian Court, set an expedited hearing on the Post-Petition Financing Motion (and ultimately a final hearing) in conformity with the Milestones and the Initial Order of the Canadian Court (which approved the Post-Petition Credit Agreement).

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 interim hearing on the *Post-Petition Financing Motion* on April 5, 2016 (or as soon as possible on the Court's docket thereafter) and grant such other and further relief to which the *Monitor* and the *Chapter 15 Debtors* 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**

In re: SANJEL (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50778 Chapter 15
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**ORDER GRANTING EMERGENCY INTERIM HEARING ON
MOTION FOR AN ORDER (I) SPECIFICALLY RECOGNIZING CANADIAN COURT
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CREDIT FACILITY, (II) APPROVING LIENS ON ASSETS LOCATED IN THE
TERRITORIAL JURISDICTION OF THE UNITED STATES AND (III) GRANTING
ADEQUATE PROTECTION TO PREPETITION SECURED PARTIES**

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**”) and the Chapter 15 Debtors filed the *Motion for Emergency Interim Hearing on Motion for an Order (I) Specifically Recognizing Canadian Court Order Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States and (III) Granting Adequate Protection to Prepetition Secured Parties* (the “**Motion**”) in the above-captioned chapter 15 cases seeking an emergency interim hearing on the *Motion for an Order (I) Specifically Recognizing Canadian Court Order Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States and (III) Granting Adequate Protection to Prepetition Secured Parties* (the “**Post-Petition Financing**”

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)(P), (c) an emergency hearing is in the best interests of the Debtors and their estates, creditors, and equity security holders, (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’ ongoing operations, and (f) good and sufficient cause exists for the granting of the relief requested in the *Motion*. It is therefore,

ORDERED that an interim hearing on the *Post-Petition Financing 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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