

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
	§	
SPEEDCAST INTERNATIONAL	§	
LIMITED, <i>et al.</i> ,	§	Case No. 20-32243 (MI)
	§	
Reorganized Debtors. ¹	§	(Jointly Administered)
	§	

**MOTION OF REORGANIZED DEBTORS
FOR AN ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY WITHIN 21 DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

SpeedCast International Limited (“**Speedcast**”) and its reorganized debtor affiliates in the above-captioned chapter 11 cases (collectively, the “**Debtors**” and, as reorganized, the “**Reorganized Debtors**”)² respectfully represent the matters set forth below in support of this motion (the “**Motion**”).

Relief Requested

1. Pursuant to section 105(a) of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

² Capitalized terms undefined but referenced herein shall have the meanings ascribed to them in the Motion.



(the “**Bankruptcy Rules**”) and Section K of the Procedures for Complex Cases in the Southern District of Texas (the “**Complex Case Rules**”), the Reorganized Debtors seek a further extension of the Claim Objection Deadline to December 31, 2021 without prejudice to the Reorganized Debtors’ ability to seek a further extension.

2. In support of the Motion, the Reorganized Debtors submit the *Declaration of Michael Healy in Support of Motion of Reorganized Debtors for an Order Further Extending Deadline to Object to Claims*, attached hereto as **Exhibit A** (the “**Healy Declaration**”).

3. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit B** (the “**Proposed Order**”).

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory bases for the relief requested herein are section § 105(a) of the Bankruptcy Code and Rule 9006(b)(1) of the Bankruptcy Rules. Additionally, the Plan (as defined below) and Confirmation Order (as defined below) provide that this Court shall retain jurisdiction over this matter. *See* Plan § 11.1.

Background

5. On April 23, 2020 (the “**Petition Date**”), each of the Reorganized Debtors commenced with this Court a voluntary case under chapter 11 of the Code.

6. The Reorganized Debtors’ chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas.

7. On January 21, 2021 the Reorganized Debtors filed the *Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates* (ECF No. 1394) (the “**Plan**”).

8. On January 22, 2021, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosure Statement on a Final Basis, (II) Confirming Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates, (III) Approving Plan Settlement Agreement, and (IV) Granting Related Relief* (ECF No. 1397) (the “**Confirmation Order**”).

9. On March 11, 2021, the Plan went effective (the “**Effective Date**”).

10. On July 1, 2021 the Reorganized Debtors filed the *Emergency Motion of Reorganized Debtors for an Order Extending Deadline to Object to Claims* (ECF No. 1648) (the “**First Extension Motion**”).

11. On July 8, 2021 the Court entered the *Order Extending Deadline to Object to Claims* (ECF No. 1658) (the “**Extension Order**”). Pursuant to the Extension Order, the extension of the Claim Objection Deadline (as defined below) was without prejudice to the ability of the Reorganized Debtors to seek a further extension.

12. On September 20, 2021, the Court entered the *Order (I) Approving Omnibus Claims Objections Procedures and Filing of Substantive Omnibus Claims Objections, (II) Waiving the Requirement of Bankruptcy Rule 3007(e)(6) and (III) Granting Related Relief* (ECF No. 1719).

13. Pursuant to the Plan, the Reorganized Debtors have the right to make and file objections to, or otherwise contest, the allowance of Claims. *See* Plan § 7.1. Pursuant to the Plan, objections to Claims shall be served and filed on or before: (a) the one hundred twentieth

(120th) day following the later of (i) the Effective Date and (ii) the date that a proof of Claim is filed or amended or a Claim is otherwise asserted or amended in writing by, or on behalf of, a holder of such Claim; or (b) such later date as may be fixed by the Bankruptcy Court (the “**Claim Objection Deadline**”). *See* Plan § 7.1.

14. The current Claim Objection Deadline is October 7, 2021.

Claims Process

15. On June 30, 2020, the Reorganized Debtors filed their statements of financial affairs (ECF Nos. 392–424) and schedules of assets, liabilities, current income, expenditures, executory contracts, and unexpired leases, as required by section 521 of the Bankruptcy Code (ECF Nos. 359-391) (collectively, the “**Schedules and Statements**”). On November 9, 2020, the Reorganized Debtors filed supplements and amendments to the Schedules and Statements (ECF Nos. 917-930, 940-941).

16. On July 6, 2020, the Court entered an order (ECF No. 463) (the “**Bar Date Order**”), which established, among other things, (a) August 6, 2020 as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Reorganized Debtors that arose before the Petition Date to file a proof of such Claim in writing; and (b) October 20, 2020 as the deadline for all governmental entities holding or wishing to assert a “claim” against the Reorganized Debtors that arose before the Petition Date to file a proof of such Claim in writing.

17. In accordance with the Plan, the deadline for parties to file and serve requests for payment of Administrative Expense Claims was April 10, 2021 (thirty (30) days after the Effective Date).

18. In accordance with the Plan, the deadline for parties to file and serve claims for damages arising from a rejection of an executory contract or unexpired lease was April 25, 2021 (forty-five (45) days after the Effective Date).

19. In accordance with the Bar Date Order, Kurtzman Carson Consultants LLC (“KCC”), the Reorganized Debtors’ court-appointed claims and noticing agent, mailed the Bar Date Order and a proof of claim form to, among others, all of the Reorganized Debtors’ known creditors and other known parties in interest as of the Petition Date (ECF Nos. 525, 572, 627, 652 and 753)

20. The claims register, which is prepared and maintained by KCC, shows that approximately 1,500 proofs of claim (collectively, the “**Proofs of Claim**”) have been filed by claimants (the “**Claimants**”)³ against the Debtors in these chapter 11 cases asserting an aggregate amount of approximately \$1.2 billion. Since the Effective Date, the Reorganized Debtors and their advisors have spent considerable time reviewing, reconciling, and analyzing the filed Proofs of Claim to determine whether to pursue objections to such Claims. As of the date hereof, the Reorganized Debtors have reviewed and reconciled almost all of the Claims and are actively evaluating the few remaining. As outlined in the First Extension Motion, the review and reconciliation of the Claims involves:

- (a) communication and coordination among the Reorganized Debtors and their advisors regarding Claims recorded in the books and records of the Reorganized Debtors as compared to Proofs of Claim;
- (b) review and analysis among the Reorganized Debtors and their advisors as to numerous prospective Claims resolutions and strategy; and
- (c) coordination with KCC with respect to managing Claims data and miscellaneous requests.

³ Claimants are identified as the person or entity whose name appears in the signature block on the Proofs of Claim.

21. Since the Extension Order was entered, the Reorganized Debtors and their advisors have continued to make significant progress in reconciling Claims and other post-confirmation matters, and have, among other things: (a) reviewed and reconciled approximately 500 additional Claims, (b) filed two omnibus objections to approximately 411 Claims, (c) identified over 400 Claims that will be allowed under the Plan without objection, (d) procured the withdrawal of certain proofs of Claim, (e) liaised directly with Claimants to resolve their Claims outside the court process, and (f) categorized claims for objection, reclassification, and other modifications in preparation for omnibus and individual objections. Accounting for the omnibus objections already filed (and assuming those objections will be sustained), the Claims that will not be subject to any objections, and the other Claims that the Reorganized Debtors have resolved with the individual Claimants, the Reorganized Debtors have completed the claims process for roughly half of the claims pool.

22. Although the Reorganized Debtors and their respective advisors have made substantial progress, the Reorganized Debtors seek a further extension of the Claim Objection Deadline to continue to negotiate consensual resolutions with the Claimants with respect to the remaining Claims, and to prepare and file additional omnibus objections or individual claim objections where consensual resolutions have not been achieved. Unfortunately, several Claimants have been unresponsive to the Reorganized Debtors' and their advisors' correspondence seeking to resolve their Claims; thus the Reorganized Debtors require additional time to prepare objections to such Claims and make further efforts to consensually resolve them.

23. The Reorganized Debtors estimate that the remaining Claims and Claims subject to pending objections will be fully resolved by the end of the year. Based on the progress made in the Reorganized Debtors' claims administration process and the time it may take to fully

address the Reorganized Debtors' claims pool, an extension of the Claim Objection Deadline is appropriate.

Basis for Relief

24. The Plan, Bankruptcy Code, and Bankruptcy Rules provide ample authority on which the Court may grant the relief requested herein. Additionally, the facts and circumstances of these chapter 11 cases demonstrate that cause exists to further extend the Claim Objection Deadline.

25. First, pursuant to the Plan, “[a]ny objections to Claims shall be served and filed on or before: (a) the one hundred twentieth (120th) day following the later of (i) the Effective Date and (ii) the date that a proof of Claim is filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a holder of such Claim; or (b) *such later date as may be fixed by the Bankruptcy Court.*” Plan § 7.1 (emphasis added).

26. Second, section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a); *see also In re CEI Roofing, Inc.*, 315 B.R. 50, 56 (Bankr. N.D. Tex. 2004); *In re Cooper Props. Liquidating Trust, Inc.*, 61 B.R. 531, 537 (Bankr. W.D. Tenn. 1986) (noting that the bankruptcy court is “one of equity and as such it has a duty to protect whatever equities a debtor may have in property for the benefit of its creditors as long as that protection is implemented in a manner consistent with the bankruptcy laws.”).

27. Furthermore, Bankruptcy Rule 9006(b)(1) provides, in pertinent part, that:

when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order

Fed. R. Bankr. P. 9006(b)(1).

28. Section K of the Complex Case Rules also provides that:

Unless otherwise provided in the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, or Court order, if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion. An automatic extension under this rule does not require the issuance or entry of an order extending the time.

29. Extensions of the time to object to claims have been granted in other chapter 11 cases in this District where there are a substantial number of claims and complex issues. *See, e.g., In re EP Energy E&P Company, L.P.*, Case No. 19-35647 (MI) (Bankr. S.D. Tex. April 23, 2021) (deadline for objecting to claims initially extended by 120 days); *In re KP Engineering, LP*, Case No. 19-34698 (DRJ) (Bankr. S.D. Tex. Oct. 13, 2020) (deadline for objecting to claims extended by 192 days through several orders granting extension requests); *In re CJ Holding Co.*, Case No. 16-33590 (DRJ) (Bankr. S.D. Tex. June 9, 2017) (deadline for objecting to claims initially extended by 120 days).

30. The Reorganized Debtors submit that cause exists to extend the current Claim Objection Deadline for an additional 85 days, through and including December 31, 2021. As stated, although the Reorganized Debtors have made substantial progress in addressing Claims that have been filed against them, extending the Claim Objection Deadline to the limited extent requested herein is necessary and in the best interests of the Reorganized Debtors and their estates because the Reorganized Debtors will not be able to fully address all of the remaining Claims it is currently responsible for administering prior to the expiration of the Claim Objection Deadline. The Reorganized Debtors are actively addressing the remaining Claims and have demonstrated

substantial progress since last before the Court. Therefore, the Reorganized Debtors believe the requested extension is necessary to facilitate an effective and efficient claims administration process.

31. The Reorganized Debtors submit that extending the Claim Objection Deadline is necessary and appropriate to ensure that the claims reconciliation process, including the prosecution of objections to the Claims, is accurate, comprehensive, and completed in a timely and efficient manner. The Reorganized Debtors further submit that the requested extension is not sought for purposes of delay and is in the best interests of the Reorganized Debtors, their estates, and their creditors. A complete reconciliation will prevent creditors from potentially receiving an unwarranted recovery to the detriment of other creditors. An extension of the Claim Objection Deadline will also conserve judicial resources and avoid litigation of disputed Claims that may be consensually resolved through negotiation. Therefore, extending the Claim Objection Deadline will preserve the ability of the Reorganized Debtors to object to the Claims to maximize recovery to appropriate creditors by facilitating a more orderly, efficient, and cost-effective claims reconciliation process and reducing the overall number of disputed Claims for the benefit of the Reorganized Debtors' estate and creditors.

32. Accordingly, the Reorganized Debtors respectfully request the Court to enter an order extending the Claim Objection Deadline through and including December 31, 2021, without prejudice to the Reorganized Debtors' ability to seek a further extension of such deadline.

Notice

33. Notice of this Motion will be served via ECF, by email (if provided on the Proof of Claim) or first class mail (if email is not provided) on any Claimant whose Claim has not been Allowed or Disallowed pursuant to the Plan, and on any other party entitled to notice pursuant to Bankruptcy Rule 2002 or Local Rule 9013-1(d).

WHEREFORE the Reorganized Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: October 6, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
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Attorneys for Reorganized Debtors

Certificate of Service

I hereby certify that, on October 6, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez
Alfredo R. Pérez

EXHIBIT A

Healy Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
SPEEDCAST INTERNATIONAL LIMITED, et al.,	§	
	§	Case No. 20-32243 (MI)
	§	
Reorganized Debtors.¹	§	(Jointly Administered)
	§	

**DECLARATION OF MICHAEL HEALY
IN SUPPORT OF MOTION OF REORGANIZED DEBTORS
FOR AN ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

I, Michael Healy, pursuant to section 1746 of title 28 of the United States Code, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Chief Restructuring Officer of the Reorganized Debtors and serve as Senior Managing Director at FTI Consulting, Inc.
2. I submit this declaration in support of the *Motion of Reorganized Debtors for an Order Further Extending Deadline to Object to Claims* (the “**Motion**”).²
3. I am authorized to submit this declaration on behalf of the Reorganized Debtors and, if I were called upon to testify, I could and would competently testify to the facts set forth herein.
4. To date, approximately 1,500 Proofs of Claim have been filed by Claimants against the Reorganized Debtors in these chapter 11 cases asserting an aggregate amount of

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² Capitalized terms undefined but referenced herein shall have the meanings ascribed to them in the Motion.

approximately \$1.2 billion. As detailed in the Motion, since the Effective Date, the Reorganized Debtors and their advisors have spent considerable time reviewing, reconciling, and analyzing the filed Proofs of Claim to determine whether to pursue objections to such Claims. As of the date hereof, the Reorganized Debtors have reconciled just under approximately 1,500 Claims and are actively evaluating the few remaining pending Claims. As outlined in the First Extension Motion, the review and reconciliation of the Claims has involved:

- (a) communication and coordination among the Reorganized Debtors and their advisors regarding Claims recorded in the books and records of the Reorganized Debtors as compared to Proofs of Claim;
- (b) review and analysis among the Reorganized Debtors and their advisors as to numerous prospective Claims resolutions and strategy; and
- (c) coordination with KCC with respect to managing Claims data and miscellaneous requests.

5. Since the Extension Order was entered, the Reorganized Debtors and their advisors have continued to make significant progress in reconciling Claims and other post-confirmation matters, and have, among other things: (a) reviewed and reconciled approximately 500 additional Claims, (b) filed two omnibus objections to approximately 411 Claims, (c) identified over 400 Claims that will be allowed under the Plan without objection, (d) procured the withdrawal of certain proofs of Claim, (e) liaised directly with Claimants to resolve their Claims outside the court process, and (f) categorized claims for objection, reclassification, and other modifications in preparation for omnibus and individual objections. Accounting for the omnibus objections already filed (and assuming those objections will be sustained), the Claims that will not be subject to any objections, and the other Claims that the Reorganized Debtors have resolved with the individual Claimants, the Reorganized Debtors have completed the claims process for roughly half of the claims pool.

6. Although the Reorganized Debtors and their respective advisors have made substantial progress, the Reorganized Debtors seek a further extension of the Claim Objection Deadline to continue to negotiate consensual resolutions with the Claimants with respect to the remaining Claims, and to prepare and file additional omnibus objections or individual claim objections where consensual resolutions have not been achieved. Unfortunately, several Claimants have been unresponsive to the Reorganized Debtors' and their advisors' correspondence seeking to resolve their Claims; thus the Reorganized Debtors require additional time to prepare objections to such Claims and make further efforts to consensually resolve them.

7. The Reorganized Debtors estimate that the remaining Claims and Claims subject to pending objections will be fully resolved by the end of the year. Based on the progress made in the Reorganized Debtors' claims administration process and the time it may take to fully address the Reorganized Debtors' claims pool, an extension of the Claim Objection Deadline is appropriate.

8. Although the Reorganized Debtors and their respective advisors have made substantial progress in reconciling the Claims that have been filed against them, extending the Claim Objection Deadline is necessary and in the best interests of the Reorganized Debtors and their estates because the Reorganized Debtors will not be able to fully reconcile all Claims and file relevant objections prior to the expiration of the Claim Objection Deadline. Providing the Reorganized Debtors with the time necessary to negotiate consensual resolutions to and otherwise complete their analysis of the few remaining Claims and Claims subject to a pending objection, will prevent creditors from potentially receiving an unwarranted recovery to the detriment of other creditors.

9. I believe the requested extension is reasonable and is not sought for purposes of delay. I do not believe the requested extension will prejudice any Claimants or other parties in interest.

10. In light of the foregoing, I believe that extending the Claim Objection Deadline is necessary and appropriate to ensure that the claims reconciliation process, including the prosecution of any objections to the Claims, is accurate, comprehensive, and completed in a timely and efficient manner. The requested extension is in the best interests of the Reorganized Debtors, the Reorganized Debtors' estates, and their creditors. A complete reconciliation will prevent creditors from potentially receiving an unwarranted recovery to the detriment of other creditors. An extension of the Claim Objection Deadline will also conserve judicial resources and avoid litigation of disputed Claims that may be consensually resolved through negotiation. Therefore, extending the Claim Objection Deadline will preserve the ability of the Reorganized Debtors to object to the Claims to maximize recovery to appropriate creditors by facilitating a more orderly, efficient, and cost-effective claims reconciliation process and reducing the overall number of disputed Claims for the benefit of the Reorganized Debtors' estates and creditors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: October 6, 2021
New York, New York

/s/ Michael Healy
Michael Healy
Chief Restructuring Officer

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i>,	§	
	§	Case No. 20-32243 (MI)
	§	
Reorganized Debtors.¹	§	(Jointly Administered)
	§	

ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Upon the motion (the “**Motion**”)² of SpeedCast International Limited (“**Speedcast**”) and its reorganized debtor affiliates in the above-captioned chapter 11 cases (the “**Reorganized Debtors**”), seeking entry of an order (this “**Order**”) pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006(b) extending the current Claim Objection Deadline, all as more fully set forth in the Motion and the Healy Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and Section 11.1 of the Plan; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for

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² Capitalized terms undefined but referenced herein shall have the meanings ascribed to them in the Motion.

the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Reorganized Debtors and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Claim Objection Deadline is hereby extended through and including December 31, 2021.
2. The entry of this Order shall be without prejudice to the ability of the Reorganized Debtors to seek a further extension of the Claim Objection Deadline upon a motion by the Reorganized Debtors on or before December 31, 2021, or to seek other appropriate relief.
3. This Court shall retain jurisdiction to hear and determine all matters arising from, or related to, the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2021
Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE