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

	X	
In re:	:	Chapter 11
SUPERIOR ENERGY SERVICES, INC., et al., 1	:	Case No. 20-35812 (DRJ)
Debtors.	:	(Joint Administration Requested)
	X	

DEBTORS' EMERGENCY MOTION
FOR ENTRY OF AN ORDER (I) AUTHORIZING
THE DEBTORS TO FILE A CONSOLIDATED CREDITOR
MATRIX AND LIST OF THE 30 LARGEST UNSECURED
CREDITORS, (II) WAIVING THE REQUIREMENT TO FILE A
LIST OF EQUITY SECURITY HOLDERS, AND (III) AUTHORIZING THE
DEBTORS TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION

Emergency relief has been requested. A hearing will be conducted on this matter on December 8, 2020 at 1:00 pm (Prevailing Central Time) in Courtroom 400, 4th floor, United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Street, Houston, Texas 77002. You may participate in the hearing by audio/video connection.

Audio communication will be by use of the Court's regular dial-in facility. You may access the facility at (832) 917-1510. You will be responsible for your own long-distance charges. Once connected, you will be asked to enter the conference room number. Judge Jones' conference room number is 205691.

You may view video via GoToMeeting. To use GoToMeeting, the Court recommends that you download the free GoToMeeting application. To connect, you should enter the meeting Code "JudgeJones" in the GoToMeeting app or click the link on Judge Jones' home page on the Southern District of Texas website. Once connected, click the settings icon in the upper right corner and enter your name under the personal information setting.

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.



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Hearing appearances must be made electronically in advance of the hearing. To make your electronic appearance, go to the Southern District of Texas website and select "Bankruptcy Court" from the top menu. Select "Judges' Procedures," then "View Home Page" for Judge Jones. Under "Electronic Appearance" select "Click here to submit Electronic Appearance". Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must either appear at the hearing or file a written response prior to the hearing. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Relief is requested not later than December 8, 2020.

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") respectfully state the following in support of this emergency motion (this "<u>Motion</u>"):

RELIEF REQUESTED

- 1. By this Motion, the Debtors request entry of an order, substantially in the form attached hereto (the "Order"):
 - (a) authorizing the Debtors to file a consolidated creditor matrix and list of the 30 largest general unsecured creditors in lieu of submitting separate mailing matrices and creditor lists for each Debtor;
 - (b) waiving the requirement to file a list of and provide notice directly to the Parent's (as defined below) equity security holders; and
 - (c) authorizing the Debtors to redact certain personal identification information.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court may enter a final order consistent

with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a), 107(c), and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Rule 1007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 9013-1(i) of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules"), and the Procedures for Complex Cases in the Southern District of Texas (the "Complex Case").

BACKGROUND

- 4. The Debtors and their indirect subsidiaries are an oilfield services provider headquartered in Houston, Texas, with operations spanning Africa, the Asia Pacific region, Europe, the Middle East, North America, and Latin America. The Debtors' businesses serve the drilling, completion, and production-related needs of oil and gas companies through a diversified portfolio of specialized oilfield services and equipment that are used throughout the economic life cycle of oil and gas wells. In particular, the Debtors manufacture, rent, and sell specialized equipment and tools for use with well drilling, completion, production, and workover activities, and offer fluid handling and well servicing rigs. The Debtors also provide coiled tubing services, electric line, slickline, and pressure control tools and services, as well as snubbing and hydraulic workover services.
- 5. On the date hereof (the "<u>Petition Date</u>"), the Debtors filed voluntary petitions in this Court commencing cases for relief under chapter 11 of the Bankruptcy Code (the "<u>Chapter 11 Cases</u>"). The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the

Chapter 11 Cases, is set forth in detail in the *Declaration of Westervelt T. Ballard, Chief Financial Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Pleadings* (the "<u>First</u> <u>Day Declaration</u>"), filed contemporaneously herewith and fully incorporated herein by reference.²

- 6. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been requested in the Chapter 11 Cases, and no committees have been appointed or designated.
- 7. Simultaneously with the filing of this Motion, the Debtors have filed a motion with this Court pursuant to Bankruptcy Rule 1015(b) seeking joint administration of the Chapter 11 Cases.
- 8. These Chapter 11 Cases are "prepackaged" cases commenced for the purpose of implementing a restructuring of the Debtors' liabilities. As of the Petition Date, the Debtors have entered into that certain Amended and Restated Restructuring Support Agreement, dated as of December 4, 2020 (as amended, modified, or supplemented, the "Restructuring Support Agreement")³ with holders of approximately 85% of the outstanding principal amount of the Debtors' senior unsecured notes (the "Consenting Noteholders").
- 9. A plan of reorganization reflecting the terms of the Restructuring Support Agreement (as may be amended, modified, or supplemented, the "<u>Plan</u>") was filed on the Petition Date, along with a disclosure statement with respect to the Plan (as may be amended, modified, or supplemented, the "<u>Disclosure Statement</u>"). Among other things, the Plan contemplates that all

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

The Debtors originally entered in that certain Restructuring Support Agreement, dated as of September 29, 2020, which was amended and restated by the Restructuring Support Agreement

Allowed General Unsecured Claims (as defined in the Plan) against all Debtors other than Superior Energy Services, Inc. (the "<u>Parent</u>") will be paid in full or will otherwise be unimpaired.

BASIS FOR RELIEF

A. Consolidated Creditor Matrix

10. Section 521(a)(1) of the Bankruptcy Code requires a debtor to "file a list of creditors." 11 U.S.C. § 521(a)(1). Bankruptcy Rule 1007(a)(1) requires a debtor to file a "list containing the name and address of each entity included or to be included on Schedules D, E/F, G, and H." Fed. R. Bankr. P. 1007(a)(1). Although the list of creditors is usually filed on a debtor-by-debtor basis, in a complex chapter 11 bankruptcy case involving multiple debtors, the debtors may file a consolidated creditor matrix. *See* Complex Case Procedures. Because the preparation of separate lists of creditors for each Debtor would be expensive and unduly burdensome, and because a large number of creditors may be shared among the Debtors, the Debtors respectfully request authority to file one consolidated list of creditors (the "Creditor Matrix") for all of the Debtors.

B. Consolidated List of 30 Largest Unsecured General Creditors

11. Pursuant to Bankruptcy Rule 1007(d), a debtor shall file "a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders." Fed. R. Bankr. P. 1007(d). Because a large number of creditors may be shared among the Debtors, the Debtors request authority to file a single, consolidated list of their 30 largest general unsecured creditors (the "Top 30 List"). The Top 30 List will reduce administrative costs and promote administrative efficiency. Granting this relief is consistent with the Complex Case Procedures, which require the lead Debtor to "file a single, consolidated list of creditors on Official Form B 204 consisting of the 30 largest creditors of all jointly administered debtors."

C. Waiver of the Requirements to File a List of and to Provide Notice Directly to the Equity Security Holders under the Circumstances of these Chapter 11 Cases

- 12. The Bankruptcy Rules also contain certain requirements with respect to a debtor's equity security holders. Bankruptcy Rule 1007(a)(3) requires a debtor to file, within fourteen (14) days after the petition date, a list of the debtor's equity security holders. Fed. R. Bankr. P. 1007(a)(3). Bankruptcy Rule 2002(d), in turn, requires that equity security holders be provided notice of, among other things, the commencement of the bankruptcy case and the confirmation hearing. Fed. R. Bankr. P. 2002(d). Bankruptcy courts have authority to modify or waive the requirements under both rules. Fed. R. Bankr. P. 1007(a)(3) ("[U]nless the court orders otherwise, the debtor shall file . . . a list of the debtor's equity security holders"); Fed. R. Bankr. P. 2002(d) ("[U]nless the court orders otherwise, the clerk . . . shall in the manner and form directed by the court . . . give notice to all equity security holders"); see also 11 U.S.C. § 105(a) ("The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title."); Fed. R. Bankr. P. 9007 ("When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given.").
- 13. The Debtors submit that the requirements to file a list of, and to provide notice directly to, equity holders should be waived as to Parent in this case. As an initial matter, Parent is a publicly-traded company with an actively trading stock of approximately 14,826,627 outstanding shares of common stock as of June 30, 2020. Parent does not maintain a list of its equity security holders and, therefore, must obtain the names and addresses of its shareholders from a securities agent. Preparing and submitting such a list with last known addresses for each such equity security holder and sending notices to all such parties will create undue expense and administrative burden with limited corresponding benefit to the estates or parties in interest.

14. Moreover, as soon as is practicable following the date hereof, the Debtors intend to cause the notices required under Bankruptcy Rule 2002(d) to be served on registered holders of Parent's common stock. Accordingly, the Debtors respectfully request that the requirements to file a list of and to provide notice directly to Parent's equity security holders be waived.

D. Redaction of Certain Confidential Information

- 15. Section 107(c) of the Bankruptcy Code provides that the Court:
 - for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:
 - (A) Any means of identification . . . contained in a paper filed, or to be filed, in a case under this title.
- (B) Other information contained in a paper described in subparagraph (A). 11 U.S.C. § 107(c)(1)(A).
- 16. The Debtors respectfully submit that cause exists to authorize the Debtors to redact from any paper filed or to be filed with the Court in these Chapter 11 Cases, including the Creditor Matrix and schedules and statements (if filed),⁴ the home addresses of individual creditors—including the Debtors' employees and contract workers—from the Creditor Matrix because, among other reasons, such information could be used to perpetrate identity theft or harass such individuals. The Debtors propose to provide an unredacted version of the Creditor Matrix,

Simultaneously with the filing of this Motion, the Debtors filed the Debtors' Emergency Motion for Entry of an Order (I) Conditionally Approving Disclosure Statement, (II) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement, and (B) Confirmation of Plan, (III) Establishing Deadline to Object to Disclosure Statement and Plan and Form of Notice Thereof, (IV) Approving (A) Solicitation Procedures, (B) Forms of Ballots and Notices of Non-Voting Status, and (C) Equity Rights Offering Materials (V) Conditionally Waiving Requirement of Filing Schedules and Statements and of Convening Section 341 Meeting of Creditors, with Respect to Certain Debtors, and (VI) Granting Related Relief, requesting, among other things, a waiver for all Debtors other than Parent of the requirement to file schedules and statements and commence a meeting of creditors, so long as this Court confirms the Plan by February 5, 2021.

schedules and statements (if any), and any other filings redacted pursuant to the Order to (a) the Court, (b) the Office of the U.S. Trustee (as defined below), (c) counsel for any official committee of unsecured creditors appointed in these Chapter 11 Cases (if any), (d) counsel to the Ad Hoc Noteholder Group (as defined below), and (e) upon request to the Debtors (email is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases, any party in interest. In addition, the Debtors will distribute as applicable any notices that are received at the Debtors' corporate headquarters and are intended for a current employee.

17. For these reasons, the Debtors respectfully submit that cause exists to authorize the Debtors to redact, pursuant to section 107(c)(1) of the Bankruptcy Code, the home addresses of individuals listed on the Creditor Matrix, the schedules and statements (if any), or any other document filed with the Court. Without such relief, the Debtors may render unnecessarily individuals more susceptible to identity theft and harassment by publishing their home addresses without any advance notice or opportunity to opt out or take protective measures.

EMERGENCY CONSIDERATION

18. Pursuant to Bankruptcy Local Rule 9013-1(i), the Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Rule 6003, which empowers a court to grant relief within the first twenty-one (21) days after the commencement of a chapter 11 case "to the extent that relief is necessary to avoid immediate and irreparable harm." The Debtors believe an immediate and orderly transition into chapter 11 is critical to the viability of their operations and the success of the Chapter 11 Cases. As discussed in detail above and in the First Day Declaration, immediate and irreparable harm would result if the relief requested herein is not granted. The relief requested herein concerns deadlines and procedures of immediate importance at the outset of these Chapter 11 Cases, and the relief requested will save costs and avoid undue

administrative burden and confusion only if granted before the applicable deadlines. Accordingly, failure to receive the applicable relief during the first twenty-one (21) days of the Chapter 11 Cases would disrupt the Debtors' operations at this critical juncture. Accordingly, the Debtors submit that they have satisfied the "immediate and irreparable harm" standard of Bankruptcy Rule 6003 as well as the requirements of Bankruptcy Local Rule 9013-1(i) and, therefore, respectfully request that the Court approve the relief requested in this Motion on an emergency basis.

BANKRUPTCY RULE 6004 SHOULD BE WAIVED

19. To the extent that any aspect of the relief sought herein constitutes a use of property under section 363(b) of the Bankruptcy Code, the Debtors request a waiver of the notice requirements under Bankruptcy Rule 6004(a) and the fourteen-day stay under Bankruptcy Rule 6004(h). As described above, the relief that the Debtors request in this Motion is immediately necessary in order for the Debtors to be able to continue to operate their businesses and preserve the value of their estates. The Debtors respectfully request that the Court waive the notice requirements imposed by Bankruptcy Rule 6004(a) and the fourteen-day stay imposed by Bankruptcy Rule 6004(h), as the exigent nature of the relief sought herein justifies immediate relief.

RESERVATION OF RIGHTS

20. Nothing contained herein is or should be construed as: (a) an admission as to the validity of any claim against any Debtor or the existence of any lien against the Debtors' properties; (b) a waiver of the Debtors' or any other party in interest's rights to dispute any claim or lien on any grounds; (c) a promise to pay any claim; (d) an implication or admission that any particular claim would constitute an allowed claim; (e) an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code; (f) a limitation on the Debtors'

rights under section 365 of the Bankruptcy Code to assume or reject any executory contract with any party subject to the proposed Order once entered; or (g) a waiver of the Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law. Nothing contained in the Order shall be deemed to increase, decrease, reclassify, elevate to an administrative expense status, or otherwise affect any claim to the extent it is not paid.

CONSENT TO JURISDICTION

21. The Debtors consent to the entry of a final judgment or order with respect to this Motion if it is determined that the Court would lack Article III jurisdiction to enter such final judgment or order absent consent of the parties.

NOTICE

District of Texas (the "<u>U.S. Trustee</u>"); (b) the parties included on the Debtors' consolidated list of the holders of the 30 largest unsecured claims against the Debtors; (c) counsel to the agent for the Debtors' prepetition secured asset-based revolving credit facility (the "<u>Prepetition ABL Agent</u>"); (d) counsel to the indenture trustee for the Debtors' prepetition notes; (e) counsel to that certain ad hoc group of holders of prepetition senior notes (the "<u>Ad Hoc Noteholder Group</u>"); (f) the United States Attorney's Office for the Southern District of Texas; (g) the parties included on the Debtors' consolidated list of the holders of the 30 largest unsecured claims against the Debtors; (h) the Internal Revenue Service; (i) the Securities and Exchange Commission; (j) the state attorneys general for states in which the Debtors conduct business; (k) the Environmental Protection Agency; and (l) all parties that have requested or that are required to receive notice

pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors submit that no other or further notice is required or needed under the circumstances.

23. A copy of this Motion is available on (a) the Court's website: www.txs.uscourts.gov, and (b) the website maintained by the Debtors' proposed Claims and Noticing Agent, Kurtzman Carson Consultants LLC, at www.kccllc.net/superior.

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WHEREFORE, the Debtors respectfully request that the Court enter the proposed Order, substantially in the form attached hereto, granting the relief requested in the Motion and such other and further relief as may be just and proper.

Signed: December 7, 2020

Houston, Texas

Respectfully Submitted,

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)

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Proposed Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on December 7, 2020, 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 on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

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

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In re:	:	Chapter 11
SUPERIOR ENERGY SERVICES, INC., et al.,1	:	Case No. 20-35812 (DRJ)
Debtors.	:	(Joint Administration Requested)
	: x	

ORDER (I) AUTHORIZING THE
DEBTORS TO FILE A CONSOLIDATED CREDITOR
MATRIX AND LIST OF THE 30 LARGEST UNSECURED
CREDITORS, (II) WAIVING THE REQUIREMENT TO FILE A LIST
OF EQUITY SECURITY HOLDERS, (III) AUTHORIZING THE DEBTORS
TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION

[Relates to Motion at Docket No.

Upon the emergency motion (the "<u>Motion</u>")² of the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") for entry of an order (this "<u>Order</u>") (i) authorizing the Debtors to file a consolidated creditor matrix and list of the 30 largest general unsecured creditors; (ii) waiving the requirement to file a list of and provide notice directly to the Parent's equity security holders; and (iii) authorizing the Debtors to redact certain personal identification information, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.

² Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Motion.

found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given under the circumstances and that no other or further notice is necessary; and all objections, if any, to entry of this Order having been withdrawn, resolved, or overruled; and upon the record herein; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in the Order, it is hereby

ORDERED THAT:

- 1. The Debtors are authorized to file a single consolidated Creditor Matrix for all of these Chapter 11 Cases.
 - 2. The Debtors are authorized to file a consolidated Top 30 List.
- 3. The requirement that the Parent file a list of its equity security holders pursuant to Bankruptcy Rule 1007(a)(3) is waived.
- 4. The Debtors shall comply with the requirements set forth in Bankruptcy Rule 2002(d) to the extent reasonably practicable. The Debtors shall, to the extent reasonably practicable, serve all notices required by Bankruptcy Rule 2002(d) on the registered holders of the Parent's equity securities, and to the extent they are known, on beneficial equity holders through the appropriate broker, Depository Trust Company participant, or other intermediary, to the extent a beneficial equity holder holds such equity interest through such intermediary.
- 5. The Debtors are authorized to redact the home addresses of individual employees listed on the Creditor Matrix, schedules and statements (if any), or any other document filed with the Court. The Debtors shall provide an unredacted version of the Creditor Matrix, schedules and

statements (if any), and any other filings redacted pursuant to this Order to (a) the Court, the U.S.

Trustee, counsel to the Ad Hoc Noteholder Group, and counsel to an official committee of

unsecured creditors (if any) appointed in these Chapter 11 Cases, and (b) upon request to the

Debtors (email is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases,

any party in interest; provided, that any receiving party shall not transfer or otherwise provide such

unredacted document to any person or entity not party to the request. The Debtors shall inform

the U.S. Trustee, counsel to the Ad Hoc Noteholder Group, and the Court promptly after denying

any request for an unredacted document pursuant to this Order.

6. The Debtors shall file an 8-K with the U.S. Securities and Exchange Commission

notifying equity holders of the Debtors of the filing of these Chapter 11 Cases and providing a link

to the website relating to the Debtors' Chapter 11 Cases set up by the Debtors' claims and noticing

agent.

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice

of such Motion, and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules

are satisfied by such notice.

8. Notwithstanding Bankruptcy Rule 6004(h), to the extent applicable, this Order shall

be effective and enforceable immediately upon entry hereof.

9. The Debtors are hereby authorized to take such reasonable actions and to execute

such documents as may be necessary to implement the relief granted by this Order.

10. The Court retains exclusive jurisdiction with respect to all matters arising from or

related to the implementation, interpretation, and enforcement of this Order.

Signed , 2020

THE HONORABLE DAVID R. JONES UNITED STATES BANKRUPTCY JUDGE

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