

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TEMPLAR ENERGY LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11441 (BLS)

(Jointly Administered)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR TELEPHONIC/VIDEO HEARING ON JULY 14, 2020 AT 10:30 A.M. (ET)**

****THIS HEARING HAS BEEN ADJOURNED UNTIL JULY 16, 2020 AT 1:00 P.M. (ET)****

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE,
PARTIES SHOULD USE THE FOLLOWING INFORMATION:
JOIN ZOOMGOVMEETING: <https://debuscourts.zoomgov.com/j/1605834882>**

MEETING ID: 160 583 4882 PASSWORD: 871515

**PLEASE NOTE: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED.
COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.**

**TO APPEAR TELEPHONICALLY, PARTIES SHOULD CONTACT
COURTCALL, LLC AT 866-582-6878 TO REGISTER THEIR APPEARANCE.**

ADJOURNED CONTESTED MATTERS

1. Debtors' Motion for Entry of Orders (A) (I) Approving Bidding Procedures for the Sale of All or Substantially All of the Debtors' Assets, (II) Approving Bid Protections, (III) Scheduling a Sale Hearing and Objection Deadlines With Respect to the Sale, (IV) Scheduling an Auction, (V) Approving the Form and Manner of Notice of the Sale Hearing and Auction, (VI) Approving Contract Assumption and Assignment Procedures, and (VII) Granting Related Relief; and (B) (I) Approving the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Templar Energy LLC (4719), TE Holdcorp, LLC (6730), TE Holdings, LLC (3115), TE Holdings II, LLC (N/A), Templar Operating LLC (0810), Templar Midstream LLC (3275), and TE Holdings Management LLC (7467). The address of the Debtors' corporate headquarters is 4700 Gaillardia Parkway, Suite 200, Oklahoma City, Oklahoma 73142.

² *Amended items appear in bold and italics.*



201144120071300000000003

Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[D.I. 47](#), 6/1/20]

Related Documents:

- A. Notice of Proposed Bidding Procedures, Auction Date, and Sale Hearing [[D.I. 71](#), 6/4/20]
- B. Order (A) Approving Bidding Procedures for the Sale of All or Substantially All of the Debtors Assets, (B) Approving Bid Protections, (C) Scheduling a Sale Hearing and Objection Deadlines With Respect to the Sale, (D) Scheduling an Auction, (E) Approving the Form and Manner of Notice of the Sale Hearing and Auction, (F) Approving Contract Assumption and Assignment Procedures, and (G) Granting Related Relief [[D.I. 101](#), 6/23/20]
- C. Notice of Designation of Stalking Horse Bidder [[D.I. 102](#), 6/23/20]
- D. Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and Proposed Cure Amounts [[D.I. 103](#), 6/23/20]
- E. Order Authorizing and Approving (I) the Selection of Tapstone Energy, LLC as the Stalking Horse Bidder for Certain of the Debtors' Assets and (II) Related Bidding Protections [[D.I. 130](#), 6/29/20]
- F. Notice of Filing of Proposed Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [[D.I. 153](#), 6/30/20]
- G. Notice of Stipulation by and Among the Debtors and the Le Norman Parties [[D.I. 181](#), 7/9/20]
- H. *Notice of Designation of Successful Bidder* [[D.I. 195](#), 7/10/20]**

Response Deadline: July 7, 2020 at 4:00 p.m. (ET)

Responses Received:

- A. Informal Comments
 - i. Texas Railroad Commission
 - ii. Certain Texas Taxing Entities
 - iii. Environmental Protection Agency
 - iv. John Franklin King

- B. Limited Objection of the Texas Comptroller of Public Accounts [[D.I. 96](#), 6/18/20]
- C. Spitfire Energy Group, LLC's Objection to Cure Amount [[D.I 161](#), 7/6/20]
 - i. Notice of Withdrawal [[Docket No. 197](#), 7/13/20]*
- D. Objection of A2D Technologies, Inc. d/b/a TGS Geological Products and Services to (I) Sale Motion; and (II) Potential Assumption and Assignment of Master License Agreement and Related Supplements [[D.I. 165](#), 7/7/20]
 - i. Declaration of Carl Neuhaus in Support of Objection of A2D Technologies, Inc. d/b/a TGS Geological Products and Services to (I) Sale Motion; and (II) Potential Assumption and Assignment of Master License Agreement and Related Supplements [[D.I. 196](#), 7/13/20]*
- E. Limited Objection and Reservation of Rights of PAC Production Company, Kerry B. Rice, Inc., Cattalo, Ltd. and John R. Buckthal to Notice of Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and Proposed Cure Amounts [[D.I. 166](#), 7/7/20]
- F. Limited Objection and Reservation of Rights of Presidio Investment Holdings LLC, Presidio MPO LLC and Presidio Petroleum LLC to Notice of Potential Assumption and Assignment of Certain Executory Contracts [[D.I. 167](#), 7/7/20]
- G. J-W Power Company's Objection and Reservation of Rights to the Notice of Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and Proposed Cure Amounts [[D.I. 168](#), 7/7/20]
- H. Protective Objection by the United States to Debtors' Motion for Entry of Orders (A) (I) Approving Bidding Procedures for the Sale of All or Substantially All of the Debtors' Assets, (II) Approving Bid Protections, (III) Scheduling a Sale Hearing and Objection Deadlines With Respect to the Sale, (IV) Scheduling an Auction, (V) Approving the Form and Manner of Notice of the Sale Hearing and Auction, (VI) Approving Contract Assumption and Assignment Procedures, and (VII) Granting Related Relief; and (B) (I) Approving the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[D.I. 169](#), 7/7/20]
- I. Objection by the Bivins Family to Debtors' Motion for Entry of Orders (A) (I) Approving Bidding Procedures for the Sale of All or Substantially All of the Debtors' Assets, (II) Approving Bid Protections, (III) Scheduling a Sale Hearing and Objection Deadlines With Respect to the Sale, (IV) Scheduling an Auction, (V) Approving the Form and Manner of Notice of the Sale

Hearing and Auction, (VI) Approving Contract Assumption and Assignment Procedures, and (VII) Granting Related Relief; and (B) (I) Approving the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[D.I. 182](#), 7/9/20]

Status: A chart setting forth the status of each of the responses listed above is attached hereto **Exhibit A**. *This matter is adjourned until July 16, 2020 at 1:00 p.m. (ET).*

2. Debtors' Motion for Entry of: (I) an Order (A) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (B) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures, (C) Approving the Combined Notice, and (D) Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors; and (II) an Order (A) Approving the Adequacy of the Disclosure Statement, (B) Approving the Solicitation Procedures, and (C) Confirming the Plan [[D.I. 15](#), 6/1/20]

Related Documents:

- A. Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 16](#), 6/1/20]
- B. Disclosure Statement for Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 17](#), 6/1/20]
- C. Order (A) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (B) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures, (C) Approving the Combined Notice, (D) Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors, and (E) Granting Related Relief [[D.I. 63](#), 6/2/20]
- D. Notice of Commencement of Cases Under Chapter 11 of the Bankruptcy Code –and– Summary of Joint Prepackaged Chapter 11 Plan and Notice of Hearing to Consider (A) Adequacy of Disclosure Statement; (B) Confirmation of Plan of Reorganization; and (C) Related Materials [[D.I. 70](#), 6/4/20]
- E. Notice of Filing of Supplement to the Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 125](#), 6/25/20]
- F. Certification of Andres A. Estrada With Respect to the Tabulation of Votes on the Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 162](#), 7/7/20]

- G. Notice of Stipulation by and Among the Debtors and the Le Norman Parties [[D.I. 181](#), 7/9/20]
- H. Debtors' Memorandum of Law in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Amended Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 184](#), 7/9/20]
- I. Declaration of Brian A. Simmons in Support of Confirmation of the Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 185](#), 7/9/20]³
- J. Declaration of Steven P. Coverick of Alvarez & Marsal North America, LLC in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Joint Prepackaged Plan of Liquidation [[D.I. 186](#), 7/9/20]⁴
- K. Amended Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 190](#), 7/9/20]
- L. Notice of Filing of Blackline of Amended Plan [[D.I. 191](#), 7/9/20]
- M. Notice of Filing of Amendment to Plan Supplement [[D.I. 192](#), 7/9/20]
- N. *Notice of Filing of Proposed Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Amended Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I. 194](#), 7/10/20]***

Response Deadline: July 2, 2020 at 4:00 p.m. (ET)

Responses Received:

- A. Informal Comments of the U.S. Trustee
- B. Objection by the United States to the Joint Prepackaged Plan of Liquidation of Templar Energy LLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [[D.I 157](#), 7/2/20]
- C. Objection of David D. Le Norman, Spitfire Energy Group, LLC; Le Norman Properties, LLC; Le Norman Titan Investment, LLC; Reign Capital Holdings,

³ *The location of this declarant is Oklahoma City, Oklahoma.*

⁴ *The location of this declarant is Dallas, Texas.*

LLC, Reign Operating, LLC; Le Norman Group A LLC; Le Norman Group B LLC; Knight Legacy I LLC; Knight Legacy II LLC; Le Norman Fund I, LLC to Confirmation of the Debtors' Plan of Liquidation [[D.I. 158](#), 7/2/20]

Status: Response A has been resolved through revisions to the Plan. The Debtors are continuing to work with parties to resolve or narrow the issues in Responses B and C prior to the hearing. ***This matter is adjourned until July 16, 2020 at 1:00 p.m. (ET).***

Dated: July 13, 2020
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jaime Luton Chapman

Pauline K. Morgan (No. 3650)
Jaime Luton Chapman (No. 4936)
Tara C. Pakrouh (No. 6192)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253
Email: pmorgan@ycst.com
jchapman@ycst.com
tpakrouh@ycst.com

- and -

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Paul M. Basta (admitted *pro hac vice*)
Robert A. Britton (admitted *pro hac vice*)
Sarah Harnett (admitted *pro hac vice*)
Teresa Lii (admitted *pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 373-3000
Fax: (212) 757-3990
Email: pbasta@paulweiss.com
rbritton@paulweiss.com
sharnett@paulweiss.com
tlii@paulweiss.com

Co-Counsel to the Debtors and Debtors-in-Possession