

**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)

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

**NOTICE OF FILING OF THE ORDINARY COURSE
PROFESSIONAL DECLARATION OF RYAN, LLC**

PLEASE TAKE NOTICE that, in accordance with the procedures set forth in the *Order Authorizing Employment and Payment of Professionals Used in the Ordinary Course of Business* [Docket No. 146] (the “OCP Order”),² the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file the ordinary course professional disclosure declaration (the “Declaration of Disinterestedness”) of Ryan, LLC (the “Ordinary Course Professional”), attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that objections to the Declaration of Disinterestedness, if any, must be filed in accordance with the OCP Order on or before **August 10, 2020 at 4:00 p.m. (ET)** with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of any objection upon the Ordinary Course Professional and (a) co-counsel for the Debtors (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York,

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 Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the OCP Order.



New York 10019 (Attn: Sarah Harnett and Teresa Lii (emails: sharnett@paulweiss.com and tlii@paulweiss.com)) and (ii) Young Conaway Stargatt & Taylor, LLP, 1000 N. King Street, Wilmington, Delaware 19801 (Attn: Pauline K. Morgan and Jaime Luton Chapman (emails: pmorgan@ycst.com and jchapman@ycst.com)); (b) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware, 19801 (Attn: Jane M. Leamy (email: Jane.M.Leamy@usdoj.gov)); (c) counsel to the DIP Agent and RBL Agent (i) Morgan, Lewis & Bockius LLP, One Federal Street, Boston, MA 02110 (Attn: Amy L. Kyle and Andrew J. Gallo (emails: amy.kyle@morganlewis.com and andrew.gallo@morganlewis.com)) and (ii) Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801 (Attn: Mark D. Collins (email: collins@rlf.com)); and (d) counsel to any statutory committee appointed in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that, if no objections are filed in accordance with this Notice, then the Ordinary Course Professional shall be deemed to be an Ordinary Course Professional within the purview of the OCP Order without the necessity of a hearing or further notice, at which time the Debtors shall be authorized to compensate the Ordinary Course Professional consistent with the terms of the OCP Order.

[Signature page follows]

Dated: July 30, 2020
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Tara C. Pakrouh

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

EXHIBIT A

Declaration of Disinterestedness

**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)

Ref. Docket Nos. 90 & 146

**DECLARATION IN SUPPORT OF EMPLOYMENT OF RYAN, LLC
AS PROFESSIONAL USED IN THE ORDINARY COURSE OF BUSINESS**

I, SEAN KILEY, declare that the following is true to the best of my knowledge, information, and belief:

1. I am a Principal of Ryan, LLC, located in Three Galleria Tower, 13155 Noel Road, Suite 100, Dallas, Texas 75240 (the “Company”), which has been employed by Templar Energy LLC., and affiliated debtors, as debtors and debtors in possession (collectively, the “Debtors”), in the above-captioned cases (the “Chapter 11 Cases”), in the ordinary course of the Debtors’ business. The Debtors wish to retain the Company to continue providing ordinary course services during the Chapter 11 Cases, and the Company has consented to provide such services. This Declaration is submitted in compliance with the *Order Authorizing Employment and Payment of Professionals Used in the Ordinary Course of Business* of the United States Bankruptcy Court for the District of Delaware, entered on June 29, 2020 (the “Ordinary Course Professionals Order”).

2. The Company may have performed services in the past and may perform services in the future, in matters unrelated to these Chapter 11 Cases, for persons that are parties in interest in the Debtors’ Chapter 11 Cases. The Company does not perform services for any such person in

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connection with these Chapter 11 Cases or have any relationship with any such person, their attorneys, or accountants that will be adverse to the Debtors or their estates with respect to the matter on which the Company is proposed to be employed.

3. The Debtors have requested that the Company provide tax related services to the Debtors. Specifically, Debtors have requested that the Company assist the Debtors with a review of Debtors' tax payment records to identify tax refund and/or tax reduction opportunities. The Company has agreed to provide such services.

4. The Company has provided services to the Debtors prior to the commencement of the Chapter 11 Cases.

5. As part of its customary practice, the Company is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these Chapter 11 Cases.

6. Neither I nor any principal, partner, director, officer, etc., of or professional employed by, the Company has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal(s) and regular employees of the Company.

7. Neither I nor any principal, partner, director, officer, of or professional employed by the Company, insofar as I have been able to ascertain, holds, or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Company is to be employed.

8. The Debtors owe the Company Zero and 00/100 Dollars [\$0.00] for fees and services incurred prior to and unpaid as of the date of the Chapter 11 Cases were commenced (the

“Petition Date”), the payment of which subject to limitations contained in the United States Bankruptcy Code and any orders of the Court.

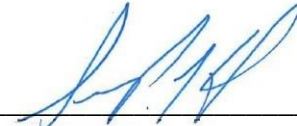
11. As of the Petition Date the Company was not a party to an agreement for indemnification with certain of the Debtors.

12. The Company is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any during the period of its employment, if the Company should discover any facts bearing on the matters described herein, the Company will supplement the information contained in the Declaration.

[Remainder of this page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: July 29, 2020



Sean Kiley
Declarant

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