

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE: §
§
VISTA PROPPANTS AND LOGISTICS, § CASE NO. 20-42002-ELM-11
LLC, et al. §
§
DEBTORS. § Jointly Administration Requested

FORD MOTOR CREDIT COMPANY LLC'S RESPONSE
TO DEBTOR'S MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS
AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING

TO THE HONORABLE FORT WORTH, U.S. BANKRUPTCY JUDGE:

COMES NOW, Ford Motor Credit Company LLC ("Ford") and files this its Response to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 363(c), 363(e), 364(d)(1) and 364(e) and (B) Utilize Cash Collateral of Pre-Petition Secured Entities, (II) Granting Adequate Protection to Pre-Petition Secured Entities, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c), and (IV) Granting Related Relief (the "Motion") filed by Vista Proppants and Logistics, LLC ("Debtor") and for same would respectfully show the Court as follows:

1. Ford has a security interest in the following vehicles, all of which are owned by Debtor Lonestar Prospects LLC:

2018 Ford F150	1FTEW1E56JKC80981
2018 Ford F150	1FTEW1E55JKD16112
2014 Ford F150	1FTFW1EF8EKG24572
2018 Ford T250	1FTYR2XV3JKA55473
2018 Ford F150	1FTEW1E57JKF13587

As Debtor Lonestar Prospects LLC has not yet filed its Schedules and Ford has not had the opportunity to inspect its Collateral, it is unknown if there is equity in the Collateral.

2. Debtor's Motion is not clear with regard to Ford's Claims. Indeed, Ford was not served with the Motion prior to the entry of the Interim Order. To the extent that the Debtor seeks a super priority lien which primes Ford's liens in the Collateral, Ford objects to the Debtor's Motion in that Debtor has not shown that Ford's interest in the Collateral is adequately protected pursuant to 11 U.S.C. §364(d)(1)(B). To the extent that the Debtor seeks to grant any lien superior to Ford's liens in the Collateral, the Debtor's Motion should be denied.



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WHEREFORE, PREMISES CONSIDERED, Ford Motor Credit Company LLC prays for and Order of this Court:

1. Denying the Debtor's Motion for Entry of Interim and Final Orders; and
2. For such other and further relief, both general and specific, to which Ford Motor Credit Company LLC may show itself justly entitled.

Respectfully submitted,

/s/ Stephen G. Wilcox

Stephen G. Wilcox

State Bar Number 21454300

WILCOX LAW, PLLC

P.O. Box 201849

Arlington, Texas 76006

(817) 870-1694 Telephone

swilcox@wilcoxlaw.net

ATTORNEY FOR FORD MOTOR CREDIT
COMPANY LLC

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Response has been served by FIRST CLASS MAIL, POSTAGE PRE-PAID on:

Vista Proppants and Logistics, LLC
4413 Carey Street
Fort Worth, TX 76119

and by ELECTRONIC FILING on:

David Staab
301 Commerce St., Suite 2600
Fort Worth, TX 76102

United States Trustee
1100 Commerce St., Room 976
Dallas, TX 75202

Office of the U.S. Trustee
110 N. College Ave., Suite 300
Tyler, TX 75702

on June 29, 2020.

/s/ Stephen G. Wilcox

Stephen G. Wilcox

1702-37022-511994