

Stephen M. Pezanosky
State Bar No. 15881850
Matthew T. Ferris
State Bar No. 24045870
David L. Staab
State Bar No. 24093194
Alexandra Kirincic
State Bar No. 24116621
HAYNES AND BOONE, LLP
301 Commerce Street, Suite 2600
Fort Worth, TX 76102
Telephone: 817.347.6600
Facsimile: 817.347.6650
Email: stephen.pezanosky@haynesboone.com
Email: matt.ferris@haynesboone.com
Email: david.staab@haynesboone.com
Email: alex.kirincic@haynesboone.com

ATTORNEYS FOR DEBTORS

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

In re:	§	Chapter 11
	§	
Vista Proppants and Logistics, LLC, et al., ¹	§	Case No. 20-42002-ELM-11
	§	
Debtors.	§	Jointly Administered

MOTION FOR EXPEDITED HEARING

Vista Proppants and Logistics, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-referenced chapter 11 cases (collectively, the “Debtors”) hereby file this motion requesting a hearing on an expedited basis (the “Motion to Expedite”) to consider the *Debtors’ Expedited Application for Entry of an Order Under 11 U.S.C. §§ 327(a), 328(a), and 1107(b) Authorizing the Employment and Retention of Piper Sandler & Co. as Investment Banker*

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) (“Vista”); VPROP Operating, LLC (0269) (“VPROP”); Lonestar Prospects Management, L.L.C. (8451) (“Lonestar Management”); MAALT Specialized Bulk, LLC (2001) (“Bulk”); Denetz Logistics, LLC (8177) (“Denetz”); Lonestar Prospects, Ltd. (4483) (“Lonestar Ltd.”); and MAALT, LP (5198) (“MAALT”). The location of the Debtors’ service address is 4413 Carey Street, Fort Worth, TX 76119-4219.



to the Debtors in Possession [Docket No. 531] (the “Piper Sandler Retention Application”). In support of the Motion to Expedite, the Debtors respectfully state as follows:

1. On June 9, 2020 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) commencing the above captioned cases (the “Chapter 11 Cases”). The Debtors continue to manage and operate their businesses as debtors-in-possession pursuant to Bankruptcy Code Sections 1107 and 1108.

2. On June 23, 2020, an official committee of unsecured creditors (the “Committee”) was appointed in these Chapter 11 Cases. No trustee or examiner has been requested or appointed in these Chapter 11 Cases.

3. On September 17, 2020, the Debtors filed the Piper Sandler Retention Application.

4. In light of the Debtors’ need for valuation testimony at the confirmation hearing scheduled for October 1, 2020 to be provided by Piper Sandler, the Debtors request that the Piper Sandler Retention Application be heard on an expedited basis at the hearing scheduled for **September 24, 2020, at 1:30 p.m. Central Time**. An expedited hearing on the Piper Sandler Retention Application will not inconvenience the parties because the Debtors already have a hearing scheduled in these cases for this date.

5. Notice of this Motion to Expedite will be provided to the parties listed on the Debtors’ service list in accordance with the *Order Granting Complex Chapter 11 Bankruptcy Case Treatment* (collectively, the “Notice Parties”).

6. WHEREFORE the Debtors respectfully requests that the Court (i) grant the Motion to Expedite and (ii) grant such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED this 17th day of September, 2020.

HAYNES AND BOONE, LLP

By: /s/ David L. Staab
Stephen M. Pezanosky
State Bar No. 15881850
Matthew T. Ferris
State Bar No. 24045870
David L. Staab
State Bar No. 24093194
Alexandra Kirincic
State Bar No. 24116621
301 Commerce Street, Suite 2600
Fort Worth, TX 76102
Telephone: 817.347.6600
Facsimile: 817.347.6650
Email: stephen.pezanosky@haynesboone.com
Email: matt.ferris@haynesboone.com
Email: david.staab@haynesboone.com
Email: alex.kirincic@haynesboone.com

ATTORNEYS FOR DEBTORS

CERTIFICATE OF CONFERENCE

The undersigned counsel for the Debtors hereby certifies that on or before September 17, 2020, counsel for the Debtors conferred via e-mail with counsel for (i) the Committee, (ii) the Term Loan Agent and (iii) the Office of the US Trustee regarding the Motion to Expedite. The Committee, the Term Loan Agent, and the US Trustee consent to expedited consideration of the Piper Sandler Retention Application.

/s/ David L. Staab
David L. Staab

Exhibit A

Proposed Order

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

In re:	§	Chapter 11
	§	
Vista Proppants and Logistics, LLC, et al., ¹	§	Case No. 20-42002-ELM-11
	§	
Debtors.	§	Jointly Administered

ORDER GRANTING MOTION FOR EXPEDITED HEARING

The Court has considered the *Motion for Expedited Hearing* (the “Motion to Expedite”),² filed by Vista Proppants and Logistics, LLC, *et al.* (collectively, the “Debtors”). The Court finds that good and sufficient cause exists to grant the relief requested in the Motion to Expedite.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) (“Vista HoldCo”); VPROP Operating, LLC (0269) (“VPROP”); Lonestar Prospects Management, L.L.C. (8451) (“Lonestar Management”); MAALT Specialized Bulk, LLC (2001) (“Bulk”); Denetz Logistics, LLC (8177) (“Denetz”); Lonestar Prospects, Ltd. (4483) (“Lonestar Ltd.”); and MAALT, LP (5198) (“MAALT”). The location of the Debtors’ service address is 4413 Carey Street, Fort Worth, TX 76119-4219.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion to Expedite.

Therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion to Expedite is hereby GRANTED.
2. The Piper Sandler Retention Application shall be heard at the hearing set for **September 24, 2020 at 1:30 p.m. Central Time.**
3. The Debtors are responsible for filing and serving a Notice of Expedited Hearing.

END OF ORDER

Submitted by:

Stephen M. Pezanosky
State Bar No. 15881850
Matthew T. Ferris
State Bar No. 24045870
David L. Staab
State Bar No. 24093194
Alexandra Kirincic
State Bar No. 24116621
HAYNES AND BOONE, LLP
301 Commerce Street, Suite 2600
Fort Worth, TX 76102
Telephone: 817.347.6600
Facsimile: 817.347.6650
Email: stephen.pezanosky@haynesboone.com
Email: matt.ferris@haynesboone.com
Email: david.staab@haynesboone.com
Email: alex.kirincic@haynesboone.com

ATTORNEYS FOR DEBTORS