

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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In re	:	Chapter 11
	:	
PARAGON OFFSHORE PLC, et al.,	:	Case No. 16-10386 (CSS)
	:	
Debtors. ¹	:	Jointly Administered
	:	
	:	Re: Docket No. 1588
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**MOTION OF DEBTORS FOR AN ORDER AUTHORIZING
THEM TO EXCEED THE PAGE LIMIT REQUIREMENT FOR
THEIR BRIEF IN SUPPORT OF PLAN CONFIRMATION**

Paragon Offshore plc (in administration) and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”) hereby move this Court (the “**Motion**”) for the entry of an order, pursuant to Rule 7007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), authorizing the Debtors to exceed the page limit requirement for the *Memorandum of Law in Support of Confirmation of Debtors’ Fifth Joint Chapter 11 Plan of Paragon Offshore plc and Its Affiliated Debtors* (Docket No. 1588) (the “**Confirmation Brief**”). In support of this Motion, the Debtors respectfully represent as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Paragon Offshore plc (in administration) (6017); Paragon Offshore Finance Company (6632); Paragon International Finance Company (8126); Paragon Offshore Holdings US Inc. (1960); Paragon Offshore Drilling LLC (4541); Paragon FDR Holdings Ltd. (4731); Paragon Duchess Ltd.; Paragon Offshore (Luxembourg) S.à r.l. (5897); PGN Offshore Drilling (Malaysia) Sdn. Bhd. (9238); Paragon Offshore (Labuan) Pte. Ltd. (3505); Paragon Holding SCS 2 Ltd. (4108); Paragon Asset Company Ltd. (2832); Paragon Holding SCS 1 Ltd. (4004); Paragon Offshore Leasing (Luxembourg) S.à r.l. (5936); Paragon Drilling Services 7 LLC (7882); Paragon Offshore Leasing (Switzerland) GmbH (0669); Paragon Offshore do Brasil Ltda.; Paragon Asset (ME) Ltd. (8362); Paragon Asset (UK) Ltd.; Paragon Offshore International Ltd. (6103); Paragon Offshore (North Sea) Ltd.; Paragon (Middle East) Limited (0667); Paragon Holding NCS 2 S.à r.l. (5447); Paragon Leonard Jones LLC (8826); Paragon Offshore (Nederland) B.V.; and Paragon Offshore Contracting GmbH (2832). The Debtors’ mailing address is 3151 Briarpark Drive, Suite 700, Houston, Texas 77042. Neville Barry Kahn and David Philip Soden, each of Deloitte LLP, are the joint administrators of Paragon Offshore plc (in administration) (the “**Joint Administrators**”). The affairs, business and property of Paragon Offshore plc (in administration) are managed by the Joint Administrators.



1. On June 5, 2017, the Debtors filed the *Fifth Joint Chapter 11 Plan of Paragon Offshore plc and its Affiliated Debtors* (Docket No. 1582) (as amended, supplemented, restated, or modified from time to time, the “**Proposed Plan**”) with this Court.

2. The hearing on confirmation of the Proposed Plan is currently scheduled to commence on June 7, 2017 at 10:00 a.m. (Eastern Daylight Time). In support of confirmation of the Proposed Plan pursuant to section 1129 of the Bankruptcy Code,² the Debtors have filed their Confirmation Brief. The Confirmation Brief, among other things, responds in detail to the objections filed by the Internal Revenue Service, the United States Trustee for the District of Delaware, and the Unofficial Equity Committee (collectively, the “**Objections**”).

3. Local Rule 7007-2 and this Court's General Chambers Procedures, dated June 30, 2011 (the “**General Chambers Procedures**”), provide that no brief or memorandum shall exceed forty (40) pages in length. Del. Bankr. L.R. 7007-2(a)(iv); General Chambers P. at 3, § 2(a)(vi). A brief or memorandum, however, may exceed forty pages with leave of the court. Del. Bankr. L.R. 7007-2(a)(iv).

4. The Debtors respectfully submit that authority to exceed the page limitations prescribed by Local Rule 7007-2 and the General Chambers Procedures in connection with the Confirmation Brief is reasonable and appropriate under the circumstances. The Confirmation Brief, as filed, is approximately seventy-five (75) pages (exclusive of exhibits). This is because the Confirmation Brief, in addition to addressing each of the factors necessary for the Court to confirm the Proposed Plan under section 1129 of the Bankruptcy Code, includes detailed responses to each of the Objections.

² Capitalized terms not otherwise defined herein have the meanings given to such terms in the Confirmation Brief.

5. Although the Debtors have made the Confirmation Brief as succinct as possible under the circumstances, the Debtors cannot provide the Court with the information necessary for the full and fair adjudication of the matters presented within the forty page limit. Given the circumstances, the Debtors submit that there is more than ample justification for the relief requested herein.

WHEREFORE, the Debtors respectfully request that this Court enter an order, substantially in the form attached hereto as Exhibit A, (i) granting the Debtors leave to file the Confirmation Brief in excess of the page limitations imposed by Local Rule 7007-2 and the General Chambers Procedures and (ii) granting the Debtors such other and further relief as this Court deems just and proper.

Dated: June 5, 2017
Wilmington, Delaware

/s/ Joseph C. Barsalona II
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*Attorneys for the Debtors
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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X		
	:		
In re	:		Chapter 11
	:		
PARAGON OFFSHORE PLC, et al.,	:		Case No. 16-10386 (CSS)
	:		
Debtors.¹	:		Jointly Administered
	:		Re: Docket Nos. 1588 & ____
	X		

**ORDER AUTHORIZING THE DEBTORS TO
EXCEED THE PAGE LIMIT REQUIREMENT FOR THEIR
BRIEF IN SUPPORT OF PLAN CONFIRMATION**

Upon consideration of the (the “**Motion**”),² of Paragon Offshore plc (in administration) and its affiliated debtors, as debtors and debtors in possession (collectively, the “**Debtors**”), for an order authorizing the Debtors to exceed the page limitation for their Confirmation Brief; the Court having reviewed the Motion and the Court having found that the Debtors have demonstrated sufficient justification for approval thereof; and after due deliberation, the Court having determined that good and sufficient cause has been shown,

IT IS HEREBY ORDERED THAT:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Paragon Offshore plc (in administration) (6017); Paragon Offshore Finance Company (6632); Paragon International Finance Company (8126); Paragon Offshore Holdings US Inc. (1960); Paragon Offshore Drilling LLC (4541); Paragon FDR Holdings Ltd. (4731); Paragon Duchess Ltd.; Paragon Offshore (Luxembourg) S.à r.l. (5897); PGN Offshore Drilling (Malaysia) Sdn. Bhd. (9238); Paragon Offshore (Labuan) Pte. Ltd. (3505); Paragon Holding SCS 2 Ltd. (4108); Paragon Asset Company Ltd. (2832); Paragon Holding SCS 1 Ltd. (4004); Paragon Offshore Leasing (Luxembourg) S.à r.l. (5936); Paragon Drilling Services 7 LLC (7882); Paragon Offshore Leasing (Switzerland) GmbH (0669); Paragon Offshore do Brasil Ltda.; Paragon Asset (ME) Ltd. (8362); Paragon Asset (UK) Ltd.; Paragon Offshore International Ltd. (6103); Paragon Offshore (North Sea) Ltd.; Paragon (Middle East) Limited (0667); Paragon Holding NCS 2 S.à r.l. (5447); Paragon Leonard Jones LLC (8826); Paragon Offshore (Nederland) B.V.; and Paragon Offshore Contracting GmbH (2832). The Debtors’ mailing address is 3151 Briarpark Drive, Suite 700, Houston, Texas 77042. Neville Barry Kahn and David Philip Soden, each of Deloitte LLP, are the joint administrators of Paragon Offshore plc (in administration) (the “**Joint Administrators**”). The affairs, business and property of Paragon Offshore plc (in administration) are managed by the Joint Administrators.

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

1. The Motion is GRANTED in its entirety.
2. The Debtors are authorized to file the Confirmation Brief in excess of the page

limitations prescribed by Local Rule 7007-2 and the General Chambers Procedures.

Dated: _____, 2017
Wilmington, Delaware

THE HONORABLE CHRISTOPHER S. SONTCHI
UNITED STATES BANKRUPTCY JUDGE