

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>In re:</b> <b>SANJEL (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50778</b> <b>Chapter 15</b>
<b>In re:</b> <b>SANJEL CORPORATION,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50784</b> <b>Chapter 15</b>
<b>In re:</b> <b>SURETECH GROUP LTD.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50786</b> <b>Chapter 15</b>
<b>In re:</b> <b>SANJEL ENERGY SERVICES (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50795</b> <b>Chapter 15</b>
<b>In re:</b> <b>SURETECH COMPLETIONS (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50789</b> <b>Chapter 15</b>
<b>In re:</b> <b>SANJEL CAPITAL (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50783</b> <b>Chapter 15</b>
<b>In re:</b> <b>TERRACOR GROUP LTD.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50790</b> <b>Chapter 15</b>
<b>In re:</b> <b>TERRACOR (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50791</b> <b>Chapter 15</b>
<b>In re:</b> <b>TERRACOR RESOURCES (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50793</b> <b>Chapter 15</b>
<b>In re:</b> <b>TERRACOR LOGISTICS (USA) INC.,</b> <b>Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50794</b> <b>Chapter 15</b> <b>Joint Administration Pending</b>



**MOTION FOR EMERGENCY HEARING ON EMERGENCY EX PARTE  
APPLICATION FOR TEMPORARY RESTRAINING ORDER AND RELIEF  
PURSUANT TO SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE**

PricewaterhouseCoopers Inc. (the “*Monitor*”), in its capacity as the court appointed and authorized foreign representative (the “*Foreign Representative*”) of the above-captioned debtors (the “*Chapter 15 Debtors*”)<sup>1</sup> hereby submits this *Motion for Emergency Hearing on Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code*, and respectfully states:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and (b) and section 1501 of title 11 of the United States Code (the “*Bankruptcy Code*”).
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1410.
3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
4. On April 4, 2016, the *Monitor*, in its capacity as the *Foreign Representative*, filed chapter 15 petitions on behalf of the *Chapter 15 Debtors*.
5. In conjunction with the Petitions, on April 4, 2016, the *Monitor*, among other things, filed the *Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code* (the “*TRO Application*”).

**RELIEF REQUESTED**

6. The *Monitor* respectfully requests emergency consideration of the *TRO Application*. As set forth more fully in the *TRO Application*, the *Chapter 15 Debtors*’ business operations and sale processes may be significantly harmed if immediate relief staying execution

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<sup>1</sup> The debtors in these Chapter 15 cases are as follows: Sanjel Corporation, Suretech Group Ltd., Sanjel Energy Services (USA) Inc., Sanjel (USA) Inc., Suretech Completions (USA) Inc., Sanjel Capital (USA) Inc., Terracor Group Ltd., Terracor (USA) Inc., Terracor Resources (USA) Inc. and Terracor Logistics (USA) Inc.

of assets and litigation is not ordered by this Court. Accordingly, the *Monitor* submits that an emergency hearing on the *TRO Application* is appropriate.

**PRAYER**

The *Monitor* respectfully requests that the Court enter the Order granting the relief requested herein, substantially in the form attached hereto as **Exhibit A**, and schedule an emergency hearing on the *TRO Application* on the 5<sup>th</sup> day of April, 2016 and grant such other and further relief to which the Monitor may be justly entitled.

Dated: April 4, 2016

Respectfully submitted,

**DYKEMA COX SMITH**

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**COUNSEL FOR THE CANADIAN MONITOR AND  
FOREIGN REPRESENTATIVE**

**CERTIFICATE OF SERVICE**

I certify a copy of the foregoing document will be served upon the persons entitled to notice by either U.S. First Class Mail, postage pre-paid, by electronic notification or by the Electronic Case Filing system for the United States Bankruptcy Court for the Western District of Texas and on the parties on the attached Initial Service List by U.S. First Class mail on or before April 4, 2016:

*/s/ Deborah D. Williamson* \_\_\_\_\_

Deborah D. Williamson

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# **Exhibit “A”**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>In re: SANJEL (USA) INC., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50778 Chapter 15</b>
<b>In re: SANJEL CORPORATION, Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50784 Chapter 15</b>
<b>In re: SURETECH GROUP LTD., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50786 Chapter 15</b>
<b>In re: SANJEL ENERGY SERVICES (USA) INC., Debtor in a foreign proceeding.</b>	§ § § § §	<b>Case No. 16-50795 Chapter 15</b>
<b>In re: SURETECH COMPLETIONS (USA) INC., Debtor in a foreign proceeding.</b>	§ § § § §	<b>Case No. 16-50789 Chapter 15</b>
<b>In re: SANJEL CAPITAL (USA) INC., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50783 Chapter 15</b>

<b>In re: TERRACOR GROUP LTD., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50790 Chapter 15</b>
<b>In re: TERRACOR (USA) INC., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50791 Chapter 15</b>
<b>In re: TERRACOR RESOURCES (USA) INC., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50793 Chapter 15</b>
<b>In re: TERRACOR LOGISTICS (USA) INC., Debtor in a foreign proceeding.</b>	§ § § §	<b>Case No. 16-50794 Chapter 15 Joint Administration Pending</b>

**ORDER GRANTING EMERGENCY HEARING ON EMERGENCY  
EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND  
RELIEF PURSUANT TO SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE**

On April 4, 2016, PricewaterhouseCoopers Inc. (the “*Monitor*”), in its capacity as the court appointed and authorized foreign representative of the above-captioned debtors (the “*Chapter 15 Debtors*”) filed the *Motion for Emergency Hearing on Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code* (the “*Motion*”) in the above-captioned chapter 15 cases seeking an emergency hearing on the *Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 150(a) and 1519 of the Bankruptcy Code* (the “*TRO Application*”). The Court finds that (a) it has jurisdiction over the matters raised in the *Motion* pursuant to 28 U.S.C. §§ 1334(a) and (b) and 1501, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (c) an emergency hearing is in the best interests of the Chapter 15 Debtors and their estates, creditors, and equity security holders and would promote the fair and efficient administration of these cross-border insolvencies and result in economic and appropriate use of the parties’ and the Court’s resources, (d) proper and adequate notice of the *Motion* and hearing

thereon has been given and that no other or further notice is necessary, (e) the relief granted herein is necessary to avoid immediate and irreparable harm to the Debtors' estates, and (f) good and sufficient cause exists for the granting of the relief requested in the *Motion*. It is therefore,

**ORDERED** that the hearing on the *TRO Application* is scheduled for April 5, 2016 at 8:00 a.m. (Central Time). It is further

**ORDERED** that any person desiring to appear telephonically at the hearing should contact CourtCall at (866) 582-6878.

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