

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: CJ HOLDING CO., <i>et al.</i> , ¹ <div style="text-align: right;">Debtors.</div>	§ § § § § § §	Chapter 11 Case No. 16-33590 (DRJ) Jointly Administered Re: Docket No. 720
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**NOTICE OF FILING OF PROPOSED ORDER
SETTING DEADLINES WITH RESPECT TO THE
HEARING ON THE PROPOSED CONFIRMATION OF THE DEBTORS' PLAN**

PLEASE TAKE NOTICE THAT on November 5, 2016, the United States Bankruptcy Court for the Southern District of Texas (the “Court”) entered the *Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors’ Proposed First Amended Joint Plan of Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Approving the Rights Offering Procedures and Related Materials, (V) Scheduling Certain Dates with Respect Thereto, and (VI) Granting Related Relief* [Docket No. 720].

In connection with its approval of the Disclosure Statement, the Court scheduled a hearing for November 14, 2016, at 1:30 p.m. to discuss pretrial deadlines in anticipation of the Confirmation Hearing. A proposed *Order Setting Deadlines with Respect to the Hearing on the Proposed Confirmation of the Debtors’ Plan* (the “Proposed Order”) is attached as **Exhibit A** hereto. The Proposed Order was negotiated with and is agreed upon among the Debtors, the Official Committee of Unsecured Creditors, Nabors International Management Limited and Nabors Corporate Services, Inc., the Ad Hoc Shareholder Group, and the Secured Lender Ad Hoc Group.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number (if any), are: CJ Holding Co. (4586); Blue Ribbon Technology Inc. (6338); C&J Corporate Services (Bermuda) Ltd.; C&J Energy Production Services-Canada Ltd.; C&J Energy Services, Inc. (3219); C&J Energy Services Ltd.; C&J Spec-Rent Services, Inc. (0712); C&J VLC, LLC (9989); C&J Well Services Inc. (5684); ESP Completion Technologies LLC (4615); KVS Transportation, Inc. (2415); Mobile Data Technologies Ltd.; Tellus Oilfield Inc. (2657); Tiger Cased Hole Services Inc. (7783); and Total E&S, Inc. (5351). The location of the Debtors’ service address is 3990 Rogerdale, Houston, Texas 77042.

Dated: November 11, 2016

/s/ Chad J. Husnick

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Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
CJ HOLDING CO., <i>et al.</i> , ¹	§	Case No. 16-33590 (DRJ)
	§	
Debtors.	§	Jointly Administered
	§	
	§	Re: Docket Nos. 707, 720

**ORDER SETTING DEADLINES WITH RESPECT TO THE HEARING ON THE PROPOSED
CONFIRMATION OF THE DEBTORS' PLAN**
(Docket Nos. 707, 720)

In connection with the Debtors' request that the Court confirm the Debtors' Second Amended Chapter 11 Plan of Reorganization (Docket No. 720, p. 105-526, the "Plan"), this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; it is **HEREBY ORDERED THAT:**

1. In advance of the hearing to consider confirmation of the Plan (the "Confirmation Hearing"), the Debtors shall serve expert reports for experts that the Debtors intend to call in their case-in-chief on or before **November 15, 2016**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number (if any), are: CJ Holding Co. (4586); Blue Ribbon Technology Inc. (6338); C&J Corporate Services (Bermuda) Ltd.; C&J Energy Production Services-Canada Ltd.; C&J Energy Services, Inc. (3219); C&J Energy Services Ltd.; C&J Spec-Rent Services, Inc. (0712); C&J VLC, LLC (9989); C&J Well Services Inc. (5684); ESP Completion Technologies LLC (4615); KVS Transportation, Inc. (2415); Mobile Data Technologies Ltd.; Tellus Oilfield Inc. (2657); Tiger Cased Hole Services Inc. (7783); and Total E&S, Inc. (5351). The location of the Debtors' service address is 3990 Rogerdale, Houston, Texas 77042.

2. Any party objecting to confirmation of the Plan shall serve expert reports for experts they intend to call in opposition to the Plan (if any), on or before **November 30, 2016**.

3. The Debtors, and any other parties who wish to do so in support of the Plan, shall serve rebuttal expert reports on **December 7, 2016**.

4. Parties submitting evidence at the Confirmation Hearing shall exchange witness lists and preliminary exhibit lists on **December 5, 2016 at 4:00 p.m., prevailing Central Time** (the "Witness Disclosure Deadline").

5. Any fact and expert witnesses identified must, at the request of an opposing party, be made available for deposition prior to **December 13, 2016** (the "Discovery Cutoff"). All discovery shall be completed by the Discovery Cutoff.

6. The Court shall hold a final pretrial conference regarding the Confirmation Hearing on **December 12, 2016, at 1:30 p.m., prevailing Central Time**.

7. Witness lists and final exhibit lists for the Confirmation Hearing shall be exchanged and filed on **December 14, 2016, at 12:00 p.m., prevailing Central Time**.

8. The Confirmation Hearing shall occur on **December 16, 2016, beginning at 10:00 a.m., prevailing Central Time**.

9. Nothing in this Order prohibits any party from seeking to initiate depositions or other discovery before the Witness Disclosure Deadline.

10. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2016
Houston, Texas

DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE