

George Hofmann (10005)
Patrick E. Johnson (10771)
Jeffrey L. Trousdale (14814)
Cohne Kinghorn, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
Telephone: (801) 363-4300

Attorneys for III Exploration II LP

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

In re

III EXPLORATION II LP,

Debtor.

Bankruptcy No. 16-26471 (RKM)

Chapter 11

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER (i) CONDITIONALLY
APPROVING DISCLOSURE STATEMENT PURSUANT TO BANKRUPTCY CODE
§ 1125(f)(3), (ii) COMBINING THE HEARING ON FINAL APPROVAL OF THE
DISCLOSURE STATEMENT WITH THE HEARING ON CONFIRMATION OF THE
DEBTOR'S AMENDED PLAN OF LIQUIDATION UNDER CHAPTER 11 OF THE
BANKRUPTCY CODE, (iii) ESTABLISHING VOTING RECORD HOLDER DATE,
(iv) APPROVING SOLICITATION PROCEDURES, FORM OF BALLOTS, AND
MANNER OF NOTICE, AND (v) FIXING THE DEADLINE FOR FILING OBJECTIONS
TO THE CONFIRMATION OF THE PLAN AND/OR TO FINAL APPROVAL OF THE
DISCLOSURE STATEMENT
AND
NOTICE OF HEARING**

**(Objection Deadline: November 26, 2018)
(Hearing Date: December 4, 2018, at 1:00 p.m.)**

**TO ALL CREDITORS, EQUITY INTEREST HOLDERS, AND PARTIES IN INTEREST,
PLEASE TAKE NOTICE THAT:**

III Exploration II LP ("**Debtor**"), the debtor in the above-captioned bankruptcy case, through its counsel, has filed its *Motion for an Order (i) Conditionally Approving Disclosure Statement Pursuant to Bankruptcy Code § 1125(f)(3), (ii) Combining the Hearing on Final Approval of the Disclosure Statement with the Hearing on Confirmation of the Debtor's Amended Plan of Liquidation under Chapter 11 of the Bankruptcy Code, (iii) Establishing Voting Record Holder Date, (iv) Approving Solicitation Procedures, Form of Ballots, and Manner of Notice, and (v) Fixing the Deadline for Filing Objection to the Confirmation of the Plan and/or to Final Approval of the Disclosure Statement* (the "**Motion**") [Dkt. 522].

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

A copy of the Motion, the *Disclosure Statement for Debtor's Amended Plan of Liquidation under Chapter 11 of the Bankruptcy Code* (the "**Disclosure Statement**"), and the *Amended Plan of Liquidation under Chapter 11 of the Bankruptcy Code* (the "**Plan of Liquidation**") are being served with this Notice. The Notice, Motion, Disclosure Statement and Plan of Liquidation may also be viewed free of charge on the noticing agent's website, at <https://www.donlinrecano.com/Clients/explor/Dockets>, or copies may be obtained online through the Bankruptcy Court's CM/ECF electronic system or by written request to the undersigned counsel.

If you do not want the Court to grant the relief requested in Motion, then you or your attorney must take the following two steps:

(1) On or before November 26, 2018, file with the Bankruptcy Court a written Objection to the Motion explaining your position. Your written objection must be filed electronically, by mail, or by hand-delivery at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing, it must be deposited in the U.S. Mail in sufficient time for it to be **received** by the Court on or before November 26, 2018. You also must mail a copy to the undersigned counsel at:

George Hofmann
Cohen Kinghorn, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84101

and

(2) You must attend the hearing on the Motion, which is set for

December 4, 2018, at 1:00 p.m. (Mountain Time) in Courtroom 369, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101.
Failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these two steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing enter an order approving the Motion without hearing.

In addition to the foregoing, final approval of the Disclosure Statement and the Confirmation Hearing of the Plan of Liquidation is scheduled for December 4, 2018, at 1:00 p.m. (Mountain Time), at the United States Bankruptcy Court at 350 South Main Street, Room 369, Salt Lake City, Utah 84101. This hearing may be adjourned from time to time without further notice other than an announcement of the adjourned date(s) at said hearing and at any adjourned hearing(s).

Any objection to final approval of the Disclosure Statement or confirmation of the Plan of Liquidation must be filed with the Clerk of the Bankruptcy Court, together with proof of service, no later than November 26, 2018, and must be served so as to be received by them no later than November 26, 2018, on: (i) the Clerk, United States Bankruptcy Court, Room 301, United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101; (ii) counsel to the Debtor, George Hofmann, Cohn Kinghorn, P.C., 111 East Broadway, 11th Floor, Salt Lake City, Utah 84111; and (iii) the Office of the United States Trustee, Laurie Cayton, 405 South Main Street, Suite 300, Salt Lake City, Utah 84111.

Any objection to final approval of the Disclosure Statement must be in writing and (a) must state the name and address of the objecting party and the amount(s) of its Claim(s)¹ or the nature of its interest, and (b) must state, with particularity, the nature of its objection.

Any objection to confirmation of the Plan of Liquidation must be in writing and (a) must state the name and address of the objecting party and the amount of its Claims or the nature of its interest and (b) must state, with particularity, the nature of its objection.

If you or your attorney do not take the steps described herein, the Bankruptcy Court may decide that you do not oppose final approval of the Disclosure Statement or confirmation of the Plan of Liquidation and may enter an order approving the Disclosure Statement and the Plan of Liquidation.

In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing enter an order approving the Disclosure Statement

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

and the Plan of Liquidation without hearing.

Dated: October 26, 2018

COHNE KINGHORN, P.C.

/s/ Patrick E. Johnson

George Hofmann

Patrick E. Johnson

Jeffrey L. Trousdale

Attorneys for III Exploration II LP