

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

IN RE: KNIGHT ENERGY HOLDINGS, LLC, <i>ET AL.</i> ¹ DEBTORS	CASE NO. 17-51014 (JOINT ADMINISTRATION REQUESTED) CHAPTER 11 CHIEF JUDGE ROBERT SUMMERHAYS
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NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that Knight Energy Holdings, LLC; Knight Oil Tools, LLC; Knight Manufacturing, LLC; KDCC, LLC, f/k/a Knight Well Services, LLC; Tri-Drill, LLC; Advanced Safety & Training Management, LLC; Knight Security, LLC; Knight Information Systems, LLC; El Caballero Ranch, Inc.; Rayne Properties, LLC; Knight Aviation, LLC; Knight Research & Development, LLC; Knight Family Enterprises, LLC, HMC Leasing, LLC; and HMC Investments, LLC (collectively, the “Debtors”), as debtors-in-possession, filed for relief on August 8, 2017 under Chapter 11 of tile 11 of the United States.

PLEASE TAKE FURTHER NOTICE that the Debtors filed the following pleadings:

- a. Emergency Motion for Order Under Bankruptcy Rule 1015(b) Directing Joint Administration of Chapter 11 Cases [ECF Doc. 2];
- b. Motion to Limit Notice [ECF Doc. 3];

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Knight Energy Holdings, LLC (1930) (Case No. 17-51014); Knight Oil Tools, LLC (2667) (Case No. 17-51015); Knight Manufacturing, LLC (0600) (Case No. 17-51016); KDCC, LLC, f/k/a Knight Well Services, LLC (4156) (Case No. 17-51017); Tri-Drill, LLC (4957) (Case No. 17-51018); Advanced Safety & Training Management, LLC, (0510) (Case No. 17-51019); Knight Security, LLC (0923) (Case No. 17-51020); Knight Information Systems, LLC (0000) (Case No. 17-51021); El Caballero Ranch, Inc. (7345) (Case No. 17-51022); Rayne Properties, LLC (0000) (Case No. 17-51023); Knight Aviation, LLC (3329) (Case No. 17-51024); Knight Research & Development, LLC (3760) (Case No. 17-51025); Knight Family Enterprises, LLC (7190) (Case No. 17-51026); HMC Leasing, LLC (0814) (Case No. 17-51027) and HMC Investments, LLC (0000) (Case No. 17-51029). The Debtors' service address is 2272 SE Evangeline Thruway, Lafayette, Louisiana 70508 other than Knight Manufacturing, LLC and Advanced Safety & Training Management, LLC. Knight Manufacturing, LLC's service address is 2810-A Melancon Road, Broussard, Louisiana 70518 and Advanced Safety & Training Management, LLC's service address is 1042 Forum Drive, Broussard, Louisiana 70518.

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- c. Motion for Entry of an Order Authorizing the Debtors to (I) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (II) File a Consolidated List of Creditors, and (III) Mail Notices [ECF Doc. 4];
- d. Motion for Entry of an Order Authorizing Debtors (A) to Pay All Outstanding Pre-Petition Wages, Salaries, Other Accrued Compensation, Expense Reimbursements, Benefits, and Related Amounts; and (B) to Continue Specified Benefit Programs in the Ordinary Course of Business [ECF Doc. 5];
- e. Motion for Entry of an Order Under 11 U.S.C. §§ 105 and 363(c) Authorizing the Debtors to Pay Insurance Premium Financing Payments and Related Relief [ECF Doc. 6];
- f. Motion for Entry of an Order Under 11 U.S.C. §§105(a), 363(b), 507(a)(8) and 541 (I) Authorizing Debtors to Pay Taxes and Fees and (II) Directing Financial Institutions to Honor and Process Cash Related Checks and Transfers [ECF Doc. 7];
- g. Motion for Interim and Final Orders Under §§ 105(a) and 366 (I) Prohibiting Utility Companies from Altering or Discontinuing Service, (II) Determining that the Utility Companies Are Adequately Assured of Future Payment; and (III) Establishing Procedures for Determining Requests for Additional Assurance [ECF Doc. 8];
- h. Debtors' Motion for Entry of an Order Authorizing Compensation and Payments to Insiders [ECF Doc. 9];
- i. Motion for an Order (I) Approving Continued Use of Cash Management System, (II) Authorizing Maintenance of Pre-Petition Bank Accounts and Continued Use of Existing Business Forms, and (III) Waiving the Requirements of Bankruptcy Code §345(b) [ECF Doc. 10];
- j. Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay or Honor Prepetition Obligations to Critical Vendors [ECF Doc. 11];
- k. Motion for Entry of Interim and Final Orders Authorizing Payment of Claims on Account of Mineral Contractor Liens That May be Filed Against the Debtors' Customers and Granting Related Relief [ECF Doc. 12];
- l. Application by Debtors for Entry of an Order Authorizing the Employment and Retention of Heller, Draper, Patrick, Horn & Dabney LLC Nunc Pro Tunc to the Petition Date [ECF Doc. 13];
- m. Application of the Debtors Pursuant to Section 363(b) of the Bankruptcy Code to Employ and Retain (I) Opportune LLP as Crisis Managers and (II) Gary L. Pittman as Chief Restructuring Officer and Certain Additional Personnel, In Each Instance Nunc Pro Tunc to the Petition Date [ECF Doc. 15];

- n. Application for an Order Appointing Donlin, Recano & Company, Inc. Nunc Pro Tunc as of the Petition Date as Claims, Noticing, and Solicitation Agent for the Debtors Pursuant to 28 U.S.C. [ECF Doc. 16];
- o. Motion for Administrative Order Under Bankruptcy Code Sections 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF Doc. 17];
- p. Motion for an Order Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Post-Petition Financing, (C) Granting Security Interests and Superpriority Administrative Expense Status to the DIP Agent and the DIP Lenders, (D) Granting Adequate Protection to Existing Lienholders, (E) Scheduling a Final Hearing, and (F) Granting Related Relief [ECF Doc. 18];
- q. Motion for an Order (A) Establishing a Bar Date and Governmental Bar Date for Filing of Proofs of Claim, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code (B) Approving the Bar Date Notice, (C) Authorizing the Debtors to Provide Notice of the Bar Date, and (D) Providing for Other Relief Sought Herein [ECF Doc. 19]

(collectively, the “First Day Motions”).

Copies of the First Day Motions and all exhibits referred to are on file and available for review at the following link www.donlinrecano.com/knight and at the Office of the Clerk of Court of the United States Bankruptcy Court at the address set forth below. Copies of the First Day Motions may also be obtained via the Court’s website at www.lawb.uscourts.gov or upon written request to undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Motions will be held and begin on **August 9, at 2:00 p.m.** before the Honorable Robert Summerhays, Western District of Louisiana – Lafayette Division, 214 Jefferson Street, Suite 100, Lafayette, Louisiana 70501.

PLEASE TAKE FURTHER NOTICE that any interested party shall be allowed to raise any objection to the relief requested in the First Day Motions, orally, at the hearing.

Dated: August 8, 2017.

Respectfully submitted,

/s/ Tristan Manthey

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