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

IN RE:	CASE NO. 17-51014
KNIGHT ENERGY HOLDINGS, LLC, ET AL. 1	(JOINTLY ADMINISTERED)
DEBTORS	CHAPTER 11
	JUDGE ROBERT SUMMERHAYS

NOTIFICATION OF NON-VOTING STATUS FOR THE DEBTORS' JOINT CHAPTER 11 PLAN OF REORGANIZATION

PLEASE TAKE NOTICE that, on October 17, 2017, Knight Energy Holdings, LLC and the other entities identified in footnote 1 below (collectively, the "<u>Debtors</u>") filed that certain *Debtors' Joint Chapter 11 Plan of Reorganization as of October 17, 2017* [Dkt. No. 417] (as it may be amended, the "<u>Plan</u>") and that certain *Disclosure Statement as of October17, 2017 for the Debtors' Joint Chapter 11 Plan of Reorganization as of October 17, 2017* [Dkt. No. 418] (as it may be amended, the "<u>Disclosure Statement</u>").²

PLEASE TAKE FURTHER NOTICE that, on October 18, 2017, after notice and a hearing, pursuant to Section 1125 of the Bankruptcy Code, the Bankruptcy Court entered an Order Approving (I) Disclosure Statement as of October 17, 2017 for the Debtors' Joint Chapter 11 Plan of Reorganization as of October 17, 2017, (II) the Confirmation Hearing Notice, the Contents of the Solicitation Package, and the Manner of Mailing and Service of the Solicitation Package and Confirmation Hearing Notice, (III) the Procedures for Voting and Tabulation of

_

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 (9787) (Case No. 17-51021); El Caballero Ranch, Inc. (7345) (Case No. 17-51022); Rayne Properties, LLC (7235) (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 (8254) (Case No. 17-51029). The Debtors' service address is 2727 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 2725 SE Evangeline Thruway, Lafayette, Louisiana 70508.

² All capitalized terms not otherwise defined in this Notice shall have the meaning ascribed to them in the Plan, or the Motion for Order Approving (I) Disclosure Statement as of August 25, 2017 for the Debtors' Joint Chapter 11 Plan of Reorganization as of August 25, 2017, (II) the Confirmation Hearing Notice, the Contents of the Solicitation Package, and the Manner of Mailing and Service of the Solicitation Package and Confirmation Hearing Notice, (III) the Procedures for Voting and Tabulation of Ballots, and (IV) the Forms of Ballots [Dkt. No. 219] (the "Confirmation Procedures Motion").

Ballots, and (IV) the Forms of Ballots [Dkt. No. 422] (the "Confirmation Procedures Order") (a) approving the Disclosure Statement as providing adequate information for the holders of Claims and Interests to make a decision as to whether to accept or reject the Plan, (b) approving (among other things) this Notice and the manner of mailing and service of the Confirmation Procedures Order.

• If you hold a Claim in **Class 1 – Other Secured Claims**, the Plan provides:

Each Holder of an Allowed Class 1 Claim shall receive as determined by the Debtors or the Reorganized Debtors, as applicable, with the consent of the Majority Consenting Lenders:

- i. the collateral securing its Allowed Class 1 Claim;
- ii. Reinstatement of its Allowed Class 1 Claim;
- iii. payment in full of its Allowed Class 1 Claim on the Distribution Date;
- iv. with respect to Secured Tax Claims, such treatment that renders such Claim as Unimpaired and meets the requirements of section 1129(a)(9)(D) of the Bankruptcy Code; or
- v. such other treatment rendering its Allowed Class 1 Claim Unimpaired in accordance with section 1124 of the Bankruptcy Code.

Therefore, Holders of Allowed Class 1 Claims are conclusively presumed to have accepted the Plan under section 1126(f) of the Bankruptcy Code, and are not entitled to vote to accept or reject the Plan.

- If you hold a Claim in **Class 2 Other Priority Claims**, the Plan provides that each Holder of an Allowed Class 2 Claim shall receive either: (i) Cash equal to the full amount of its Allowed Class 2 Claim, (ii) payments over time as permitted under Section 1129(a)(9) of the Bankruptcy Code, or (iii) such other less favorable treatment as may otherwise be agreed with the Debtors and the Majority Consenting Lenders. Therefore, Holders of Allowed Class 2 Claims are conclusively presumed to have accepted the Plan under section 1126(f) of the Bankruptcy Code, and are not entitled to vote to accept or reject the Plan.
- If you hold a Claim in **Class 7 Mineral Contractor Claims**, the Plan provides:

On the Effective Date, except to the extent that a Holder of an Allowed Mineral Contractor Claim agrees to a less favorable treatment, to the extent not already satisfied pursuant to a prior order of the Bankruptcy Court, each Holder of an Allowed Class 7 Claim shall receive Cash in an amount equal to such Allowed Class 7 Claim on the later of:

- (i) the date such claim is deemed Allowed in accordance with the Plan; or
- (ii) the date due in the ordinary course of business in accordance with the terms and conditions of the particular transaction giving rise to such Allowed Class 7 Claim.

Therefore, Holders of Allowed Class 7 Claims are conclusively presumed to have accepted the Plan under section 1126(f) of the Bankruptcy Code, and are not entitled to vote to accept or reject the Plan.

• If you hold a Claim in **Class 8** – **Unsecured Convenience Class Claims**, the Plan provides:

Except to the extent that a Holder of an Allowed Unsecured Convenience Class Claim agrees to less favorable treatment, each Holder of an Allowed Class 8 Claim shall receive Cash in an amount equal to the lesser of (1) their Allowed Claim, and (2) \$1,000, paid on or after the Effective Date on the later of:

- (i) the date such claim is deemed Allowed in accordance with the Plan; or
- (ii) the date due in the ordinary course of business in accordance with the terms and conditions of the particular transaction giving rise to such Allowed Class 8 Claim.

Therefore, Holders of Allowed Class 8 Claims are conclusively presumed to have accepted the Plan under section 1126(f) of the Bankruptcy Code, and are not entitled to vote to accept or reject the Plan.

- If you hold a Claim or Interest in Class 10 Debtor Intercompany Claims or Debtor Intercompany Interests, the Plan provides that each Allowed Class 10 Claim shall be, at the option and with the consent of the Majority Consenting Lenders, either:
 - i. Reinstated; or
 - ii. canceled and released without any distribution on account of such Claims or Interests,

in each case (i) and (ii) in a tax and business efficient manner acceptable to the Debtors with the consent of the Majority Consenting Lenders.

Therefore, holders of Allowed Class 10 Claims are conclusively deemed to have accepted the Plan pursuant to section 1126(f) or rejected the Plan pursuant to section 1126(g) of the Bankruptcy Code, depending on the treatment selected above, and are not entitled to vote to accept or reject the Plan.

• If you hold a Claim in **Class 12** – **Section 510(b) Claims**, the Plan provides that Class 12 Claims, if any, will be discharged, canceled, released, and extinguished as of the Effective Date, and will be of no further force or effect, and Holders of Allowed Section 510(b) Claims will not receive any distribution on account of such Allowed Section 510(b) Claims. Therefore, pursuant to Section 1126(g) of the Bankruptcy Code, holders of Allowed Class 12 Claims are deemed to reject the Plan, and are not entitled to vote to accept or reject the Plan.

Parties in interest can obtain copies of the Solicitation Package (except Ballots) on Donlin, Recano & Company, Inc.'s website, which is www.donlinrecano.com/knight.

Dated: October 18, 2017

/s/ William H. Patrick, III

William H. Patrick III, La. Bar No. 10359 Tristan Manthey, La. Bar No. 24539 Cherie Dessauer Nobles, La. Bar No. 30476 HELLER, DRAPER, PATRICK & HORN, L.L.C. 650 Poydras Street, Suite 2500 New Orleans, LA 70130-6103 Telephone: 504-299-3300

Fax: 504-299-3399 Counsel for Debtors