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

| IN RE: | § | Chapter 11 |
|---|----------------------|---|
| ROOSTER ENERGY, L.L.C., et al. ¹ | § § 8 | Case No. 17-50705 |
| Debtors. | % % | (Joint Administration Requested) (Emergency Hearing Requested) |

NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that Rooster Energy, L.L.C., Rooster Energy Ltd., Rooster Petroleum, LLC, Rooster Oil & Gas, LLC, Probe Resources US Ltd., Cochon Properties, LLC, and Morrison Well Services, LLC (collectively the "Debtors") filed for relief on June 2, 2017, under chapter 11 of title 11 of the United States Code.

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

- a) Debtors' Emergency Motion for entry of an order directing joint administration of their Chapter 11 Cases [Doc. 6];
- b) Debtors' Emergency Motion for an order extending the time within which the debtors must file their bankruptcy schedules and statements [Doc. 8];
- c) Debtors' Emergency Motion for entry of interim and final orders (i) restraining utility companies from discontinuing, altering, or refusing service; (ii) deeming Utility Companies adequately assured of payment for future utility services, pending entry of a final order; (iii) establishing procedures for determining requests for additional assurance [Doc. 9];
- d) Debtors' Emergency Motion for entry of an order authorizing the Debtors to pay certain prepetition taxes and to make payments under insurance premium finance agreements [Doc. 10];.

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Rooster Energy, L.L.C. (7323); Rooster Energy Ltd. (9700); Rooster Petroleum, LLC (8665); Rooster Oil & Gas, LLC (8968); Probe Resources US Ltd. (0456); Cochon Properties, LLC (1694); and Morrison Well Services, LLC (9531). The Debtors' service address is 16285 Park Ten Place, Suite 120, Houston, TX 77084.

- e) Debtors' Emergency Motion for entry of an order authorizing the Debtors to (i) maintain and use existing bank accounts, cash management system, and business forms, (ii) honor certain prepetition obligations related thereto, and (iii) continue to perform certain intercompany transactions [Doc. 11];
- f) Debtors' Emergency Motion under Section 105(a) and Rules 2002 and 9007 to establish notice procedures and to limit notice for certain proceedings [Doc. 12];
- g) Debtors' Emergency Motion for entry of interim and final orders authorizing the Debtors to pay, in the ordinary course of business, (i) royalty payments, (ii) working interest disbursements, and (iii) certain other lease obligations [Doc. 13];
- h) Debtors' Emergency Motion for entry of interim and final orders (i) authorizing post-petition use of cash collateral, (ii) granting adequate protection to prepetition secured parties, (iii) modifying the automatic stay, (iv) scheduling a final hearing, and (v) granting related relief [Doc. 14];
- i) Debtors' Emergency Motion for interim and final orders authorizing, but not directing, the Debtors, in the ordinary course of their businesses, (i) to pay prepetition amounts due, and (ii) to perform post-petition obligations under a certain prepetition hedging agreement [Doc. 15]; and
- j) Debtors' Emergency Motion for authority to pay prepetition wages, salaries, vacation pay, reimbursable employee expenses, and employee benefit contributions [Doc. 16];
- k) Debtors' Emergency Motion for entry of an order authorizing payment of compensation commensurate with pre-petition payments to specified officers [Doc. 17];
- 1) Debtors' Emergency Motion for interim and final order pursuant to 11 U.S.C. §§ 105, 364, Fed. R. Bankr. P. Rule 4001(c) and L.R. 4001(b) and (c): (i) authorizing debtors to obtain post-petition financing; (ii) granting related relief; and (iii) scheduling final hearing [Doc. 19]; and
- m) Debtors' Motion for Emergency Consideration of Certain First Day Motions [Doc. 21]

(collectively, the "First Day Motions," and each a "First Day Motion").

Copies of the First Day Motions and all exhibits and supporting declarations referenced are available through the Clerk of the United States Bankruptcy Court, through the Court's website, www.lawb.uscourts.gov, or upon written request to the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that an expedited hearing on the First Day Motions will be set **for MONDAY**, **JUNE 5**, **2017 AT 1:30 P.M. CENTRAL TIME** before the Honorable Judge Robert Summerhays, United States Courthouse, 214 Jefferson Street, Suite 100, Lafayette, Louisiana 70501-7050201.

Dated: June 2, 2017 Respectfully submitted,

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.

By: /s/ Lacey E. Rochester
Jan M. Hayden
Louisiana Bar No. 6672
Edward H. Arnold III
Louisiana Bar No. 18767
Lacey E. Rochester
Louisiana Bar No. 34733
201 St. Charles Avenue, Suite 3600
New Orleans, Louisiana 70170
Telephone: (504) 566-5200
Facsimile: (504) 636-4000
jhayden@bakerdonelson.com
lrochester@bakerdonelson.com

AND

Susan C. Mathews (pro hac vice application pending)
Texas Bar No. 05060650
Daniel J. Ferretti (pro hac vice application pending)
Texas Bar No. 24096066
1301 McKinney St., Suite 3700
Houston, TX 77010
(713) 650-9700
(713) 650-9701 – Facsimile smathews@bakerdonelson.com
dferretti@bakerdonelson.com

Proposed Counsel for the Debtors and Debtors in Possession