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

In re:	§ Chapter 11
	§
REMORA PETROLEUM, L.P., et al.,	§ Case No. 20-34037 (DRJ)
	§
Debtors. <sup>1</sup>	§ (Joint Administration Requested)
	§ (Emergency Hearing Requested)

# NOTICE OF ELECTRONIC HEARING ON AUGUST 13, 2020 AT 9:30 A.M. (PREVAILING CENTRAL TIME)

On August 12, 2020, the above-captioned debtors (collectively, the "<u>Debtors</u>") commenced these chapter 11 cases.

A hearing is set for August 13, 2020 at 9:30 a.m. (prevailing Central Time) before the Honorable David R. Jones of the United States Bankruptcy Court, Houston, Texas and will be conducted electronically via both audio and video communication (as described below), to consider the following matters:

- *Joint Administration Motion*. Debtors' Emergency Motion for Entry of an Order Directing Joint Administration of Related Chapter 11 Cases [Docket No. 4]
- *Notice of Complex Case Designation*. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 5]
- Consolidated Creditor List Motion. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors and a Consolidated List of the Debtors' Thirty (30) Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, and (III) Approving the Form and Manner of Notifying Creditors of the Commencement of These Chapter 11 Cases and Other Information [Docket No. 6]
- Schedules Extension Motion. Debtors' Emergency Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Remora Petroleum, L.P. (4348); Remora Petroleum GP, LLC (4291); Remora Operating CA, LLC (1853); Remora Operating, LLC (7595); and Remora Operating Louisiana, LLC (0662). The location of the Debtors' main corporate headquarters and the Debtors' service address is: Building II, 807 Las Cimas Pkwy Suite 275, Austin, TX 78746.

- and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs [Docket No. 7]
- *Utilities Motion*. Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests [Docket No. 8]
- *Taxes Motion*. Debtors' Emergency Motion for Entry of an Order Authorizing the Payment of Certain Prepetition Taxes [Docket No. 9]
- *Cash Management Motion*. Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue to Operate their Cash Management System, (II) Honor Certain Prepetition Obligations Related Thereto, (III) Maintain Existing Business Forms, and (IV) Perform Intercompany Transactions [Docket No. 10]
- *Royalty Motion*. Debtors' Emergency Motion for Entry of an Order Authorizing the Payment of Mineral Payments and Working Interest Disbursements [Docket No. 11]
- *Joint Interest Billings Motion*. Debtors' Emergency Motion for Entry of an Order (I) Authorizing Payment of Working Interest Costs, Joint Interest Billings, and Marketing Expenses, and (II) Confirming Administrative Expense Priority Status of Outstanding Orders [Docket No. 12]
- *Employee Wages Motion*. Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (II) Continue Employee Benefit Programs [Docket No. 13]
- *Insurance Motion*. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Insurance Coverage, (B) Pay All Insurance Obligations, and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [Docket No. 14]
- *Donlin Recano Retention Application*. Debtors' Emergency Application for Entry of an Order Authorizing the Debtors to Retain and Employ Donlin, Recano & Company, Inc. as Claims, Noticing and Solicitation Agent [Docket No. 15]
- Cash Collateral Motion. Debtors' Emergency Motion for (I) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Adequate Protection to the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties, (C) Granting Liens and Superpriority Claims, (D) Modifying the Automatic Stay, and (E) Scheduling a Final Hearing; and (II) Entry of a Final Order (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Use of Cash Collateral, (C) Granting Adequate Protection to the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties, (D) Granting Liens and Superpriority Claims, and (E) Modifying the Automatic Stay [Docket No. 16]

• Disclosure Statement Motion. Debtors' Emergency Motion for Entry of an Order (I) Scheduling Hearings on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan; (II) Establishing Deadlines to Object to Disclosure Statement and Plan; (III) Approving (A) Disclosure Statement as Containing Adequate Information, (B) Solicitation Procedures, (C) Form and Manner of Notice of Disclosure Statement and Confirmation Hearings, (D) Objection Deadlines, and (E) Notice of Non-Voting Status and Opt-Out Opportunity; (IV) Approving Procedures for Assumption of Contracts and Leases and Form and Manner of Cure Notice; and (V) Granting Related Relief [Docket No. 24]

#### **Electronic Appearances**

Please note that on March 24, 2020, through the entry of General Order 2020-10, the Court invoked the *Protocol for Emergency Public Health or Safety Conditions* (the "<u>Protocol</u>"), which is set forth in the Court's General Order 2020-04. The Protocol is available at: https://www.txs.uscourts.gov/sites/txs/files/Bankruptcy%20General%20Order%202020-04%20Adoption%20of%20Contingency%20Plan\_0.pdf.

Pursuant to the Protocol, all persons will appear telephonically and also may appear via video at this hearing using the Court's electronic conference systems.

The Court will simultaneously use two technology methods to conduct electronic hearings. One method will provide audio communication. The other will provide video access to exhibits and materials presented to the Court. If a party wants to both view the documents presented to the Court and hear the proceeding, the party must 1) dial in through the audio system, and 2) log into the Court's video via join.me.

Hearing appearances should be made electronically and in advance of the hearing. You may make your electronic appearance by:

- 1) Going to the Southern District of Texas website;
- 2) Selecting "Bankruptcy Court" from the top menu;
- 3) Selecting "Judges' Procedures and Schedules";
- 4) Selecting "View Home Page" for Judge David R. Jones;

- 5) Under "Electronic Appearance" select "Click here to submit electronic appearance;"
- 6) Select Remora Petroleum, et al. from the list of electronic appearance links, and
- 7) After selecting Remora Petroleum, et al. from the list, complete the required fields and click the "Submit" button at the bottom of the page.

Submitting your appearance electronically in advance of the hearing will negate the need to make an appearance on the record at the hearing.

#### **Audio Communication**

Audio communication will conducted by use of the Court's regular dial-in number: **832-917-1510**. At the start of the call, the caller will be asked to enter a six-digit conference code. The six-digit conference code for this hearing is Judge Jones' conference room number: **205691**. Each caller shall be responsible for its own long-distance charges.

Parties are encouraged to review the Judge Jones' procedures for telephonic appearances located at https://www.txs.uscourts.gov/sites/txs/files/Court%20Procedures%20-%202-1-2020.pdf.

Attorneys, witnesses, and parties-in-interest wishing to participate in the hearing must connect to each hearing by audio communication. Any person who wishes to attend the hearing may also dial in to the audio conference dial-in number.

Each person who speaks at the electronic hearing should be prepared to restate that person's name each time that the person speaks in order to assist any transcriber of the audio recording.

#### **Video Communication**

The Debtors will offer evidence and demonstrative exhibits from a remote location. Parties may participate in electronic hearings by use of an internet connection. The internet site is www.gotomeeting.com. A GoToMeeting application is available for download for free.

Once connected to GoToMeeting, a participant must enter the meeting code "JudgeJones" for joining this hearing before Judge Jones. In the next screen, participants should enter their name in the lower left-hand corner. Then, click the setting icon in the upper right corner and enter your name under the personal information setting.

Any exhibit offered by the Debtors will be filed on the Court's docket. Any party may also obtain an electronic copy of the exhibits by request to counsel to the Debtors.

If any party wishes to offer exhibits, it is recommended that these exhibits be filed on CM/ECF. Each exhibit should be filed as a separate attachment to an Exhibit List in compliance with BLR 9013-2.

Witnesses presented by the Debtor will appear via audio and video connection. Any person wishing to examine the witness will be permitted to do so during the hearing.

All documents filed in these chapter 11 cases are available free of charge by visiting www.donlinrecano.com/remora, by calling 1-800-236-1551 (Toll Free U.S. or Canada) or 212-771-1128 (International), or by email at rpinfo@donlinrecano.com. Copies of any pleadings may be obtained by visiting the Court's website at https://ecf.txsb.uscourts.gov in accordance with the procedures and fees set forth therein.

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Dated: August 12, 2020 Respectfully Submitted,

### **HUNTON ANDREWS KURTH LLP**

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)

Joseph P. Rovira (TX Bar No. 24066008)

Catherine A. Diktaban (TX Bar No. 24109810)

600 Travis Street, Suite 4200

Houston, Texas 77002 Tel: (713) 220-4200 Fax: (713) 220-4285

Email: taddavidson@huntonak.com

josephrovira@huntonak.com cdiktaban@huntonak.com

Proposed Counsel for the Debtors and Debtors in Possession

# **CERTIFICATE OF SERVICE**

I certify that on August 12, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Timothy A. ("Tad") Davidson II
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