

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Case No. 17-10064 (KG)
Chieftain Sand and Proppant, LLC, <i>et al.</i> ,	)	Chapter 11
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	Hearing Date: February 3, 2017 at 11:00 a.m. (ET)
	)	Obj. Deadline: January 27, 2017 at 4:00 p.m. (ET)

**NOTICE OF MOTION AND HEARING**

PLEASE TAKE NOTICE that on January 9, 2017, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed **Debtors’ Motion for Orders (I)(A) Approving Bidding Procedures and Auction and (B) Scheduling Sale Hearing and Approving Notice Thereof; (II) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests; (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief** (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion with respect to the bidding procedures portion of the Motion must be in writing, filed with the Clerk of the Bankruptcy Court and served upon and received by the undersigned proposed counsel for the Debtors at or before **4:00 p.m. (Eastern Time) on January 27, 2017.**

<sup>1</sup> The Debtors in these chapter 11 cases, and the last four digits of their respective federal tax identification numbers, are Chieftain Sand and Proppant, LLC (1729) and Chieftain Sand and Proppant Barron, LLC (0418). The Debtors’ service address is: 331 27<sup>th</sup> Street, New Auburn, WI 54757.

PLEASE TAKE FURTHER NOTICE that if any objections are received, the Motion and such objections shall be considered at a hearing before the Honorable Kevin Gross, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801 on **February 3, 2017 at 11:00 a.m. (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: January 10, 2017  
Wilmington, Delaware

**GIBBONS P.C.**

By: /s/ Howard A. Cohen

Howard A. Cohen (DE 4082)

Natasha M. Songonuga (DE 5391)

300 Delaware Avenue, Suite 1015

Wilmington DE 19801-1761

Telephone: (302) 518-6330

Facsimile: (302) 429-6294

Email: hcohen@gibbonslaw.com

nsongonuga@gibbonslaw.com

**PROPOSED ATTORNEYS FOR THE DEBTORS**