

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

In re:

Chieftain Sand and Proppant, LLC, *et al.*,

Debtors.¹

Case No. 17-10064 (KG)

Chapter 11

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Caterpillar Financial Services Corporation (“Caterpillar”) hereby appears in the above-captioned matter by and through its undersigned counsel, and requests, pursuant to sections 102(1), 342, and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), that copies of all notices and pleadings given or filed in the above-captioned matter be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Kathleen A. Murphy
BUCHANAN INGERSOLL & ROONEY PC
919 N. Market Street,
Suite 1500
Wilmington, DE 19801
Telephone: (302) 552-4200
Facsimile: (302) 552-4295
kathleen.murphy@bipc.com

Peter S. Russ
BUCHANAN INGERSOLL & ROONEY PC
One Oxford Centre
301 Grant Street, 20th Floor
Pittsburgh, PA 15219-1410
Telephone: (412) 562-8800
Facsimile: (412) 562-1041
Peter.russ@bipc.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, order,

¹ 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 27th Street, New Auburn, WI 54757.

application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Caterpillar's: (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Caterpillar is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Date: Wilmington, DE
January 12, 2017

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Kathleen A. Murphy
Kathleen A. Murphy (No. 5215)
919 N. Market Street, Suite 1500
Wilmington, Delaware 19801
Telephone: (302) 552-4200
Facsimile: (302) 552-4295
Email: kathleen.murphy@bipc.com

Peter S. Russ
BUCHANAN INGERSOLL & ROONEY PC
One Oxford Centre
301 Grant Street, 20th Floor
Pittsburgh, PA 15219-1410
Telephone: (412) 562-8800
Facsimile: (412) 562-1041
Email: peter.russ@bipc.com

Counsel to Caterpillar Financial Services Corporation