

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

In re:)	Chapter 11
)	
Chieftain Sand and Proppant, LLC, <i>et al.</i> ,)	Case No. 17-10064 (KG)
)	
Debtors.)	(Jointly Administered)
)	
)	Obj. Deadline: May 16, 2017 at 4:00 p.m. (ET)
)	Hearing Date: June 27, 2017 at 11:00 a.m. (ET)

NOTICE OF MOTION

TO: Counsel to the Debtors, the Office of the United States Trustee for the District of Delaware, the Debtor's twenty (20) largest unsecured creditors and parties who have requested notice under Del. R.R. 2002-1(b).

PLEASE TAKE NOTICE that the Caldwell Baker Co. ("Caldwell Baker") has filed the attached Motion for Allowance and Immediate Payment of Administrative Expense Claim (the "Motion").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **May 16, 2017 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response upon the undersigned counsel to Caldwell Baker so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the motion will be held on **June 27, 2017 at 11:00 a.m. (ET)** before the Honorable Kevin Gross in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTION IS TIMELY FIELD IN ACCORDANCE WITH THE PROCEDURES SET FORTH ABOVE, THE BANKRUPTCY COURT MAY ENTER AN ORDER WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 24, 2017
Wilmington, Delaware

The Law Office of Edward J. Kosmowski, LLC

/s/ Edward J. Kosmowski
Edward J. Kosmowski (I.D. No. 3849)
2 Mill Road, Suite 202
Wilmington, Delaware 19806
Telephone: (302) 351-9010
Facsimile: (302) 635-1805

and

Linus L. Baker, Esq.
6732 W. 185th Terrace
Stilwell, Kansas 66085-8922
Telephone: (913) 486-3913
Facsimile: (913) 232-8734
linusbaker@prodigy.net

Attorneys for Caldwell Baker Co.