

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. ¹)	(Jointly Administered)
)	Hearing Date: June 27, 2017 at 11:00 a.m. (ET)
)	Objection Deadline: June 6, 2017 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS’ MOTION FOR AN ORDER AUTHORIZING
THE DEBTORS TO REJECT CALDWELL BAKER CO. LEASE AGREEMENT
EFFECTIVE, *NUNC PRO TUNC*, TO THE PETITION DATE AND RECLASSIFYING
PROOF OF CLAIM FILED BY CALDWELL BAKER CO.**

PLEASE TAKE NOTICE that on May 23, 2017, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed the *Motion for an Order Authorizing the Debtors to Reject Caldwell Baker Co. Lease Agreement effective nunc pro tunc, to the Petition Date and Reclassifying Proof of Claim Filed by Caldwell Baker Co.* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court and served upon and received by the undersigned counsel for the Debtors at or before **4:00 p.m. (Eastern Time) on June 6, 2017.**

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

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.

Floor, Courtroom 3, Wilmington, Delaware 19801 on **June 27, 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: May 23, 2017
Wilmington, Delaware

GIBBONS P.C.

By: /s/ Howard A. Cohen
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