

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

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| In re: |) | Chapter 11 |
| |) | |
| Chieftain Sand and Proppant, LLC, <i>et al.</i> , ¹ |) | Case No. 17-10064 (KG) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | Obj. Deadline: June 23, 2017, at 4:00 p.m. (ET) |
| |) | Hearing Date: August 15, 2017 at 10:00 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 Company (“Caldwell-Baker”) has filed the attached Amended Motion for Allowance and Immediate Payment of Administrative Expense Claims (the “Motion”).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **June 23, 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 **August 15, 2017 at 10:00 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.

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.

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: June 6, 2017
Wilmington, Delaware

The Law Office of Edward J. Kosmowski, LLC

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