IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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ECTOR COUNTY ENERGY CENTER LLC,1

Debtor.

Chapter 11

Case No. 22-10320 (JTD)

NOTICE OF (I) FILING OF CHAPTER 11 BANKRUPTCY PETITION AND FIRST DAY PLEADINGS, AND (II) SCHEDULING OF FIRST DAY HEARING

PLEASE TAKE NOTICE that on April 11, 2022, the above-captioned debtor and debtor in possession (the "**Debtor**") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "**Chapter 11 Petition**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that on the same day, in connection with the filing of the Chapter 11 Petition, the Debtor filed with the Court the following motions and application (collectively, the "**First Day Pleadings**"):

- 1. Application of Debtor for Entry of an Order Authorizing the Retention and Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtor Effective as of the Petition Date [Docket No. 3];
- 2. Motion of Debtor for Interim and Final Orders (i) Authorizing Debtor to (a) Continue Existing Cash Management System, and (b) Maintain Existing Bank Accounts and Business Forms; (iii) Waiving Requirements of 11 U.S.C. § 345(b); and (iii) Granting Related Relief [Docket No. 4];
- 3. Motion of Debtor for Entry of Interim and Final Orders (i) Prohibiting Utility Providers From Altering, Refusing or Discontinuing Utility Services, (ii) Approving Proposed Adequate Assurance of Payment to Utility Providers and Authorizing Debtor to Provide Additional Assurance, (iii) Establishing Procedures

¹ The last four digits of the Debtor's federal tax identification are 6852. The Debtor's mailing address is One South Wacker Drive, Suite 1900, Chicago, IL, 60606, and the Debtor has a principal place of business at 8200 OB Holt Road, Goldsmith, Ector County, Texas, 79761. More information about the Debtor and this case is available on the website maintained by Donlin, Recano & Company, Inc., the Debtor's proposed claims and noticing agent, at www.donlinrecano.com/ecec, or can be requested by e-mail at ececinfo@donlinrecano.com.

- to Resolve Requests for Additional Assurance and (iv) Granting Related Relief [Docket No. 5]; and
- 4. Motion of Debtor for Entry of Interim and Final Orders (i) Authorizing the Debtor to Use Cash Collateral, (ii) Granting Adequate Protection to Prepetition Secured Lenders, (iii) Modifying the Automatic Stay, (iv) Scheduling a Final Hearing, and (v) Granting Related Relief [Docket No. 6].

PLEASE TAKE FURTHER NOTICE that in support of the Chapter 11 Petition and First Day Pleadings, the Debtor relies upon the *Declaration of John Baumgartner*, *Chief Restructuring Office*, in Support of Chapter 11 Petition, First Day Motions, and Related Relief [Docket No. 2] (the "First Day Declaration").

PLEASE TAKE FURTHER NOTICE that copies of the Chapter 11 Petition, the First Day Pleadings, and the First Day Declaration are available to view at no charge via the claims and noticing agent's website (www.donlinrecano.com/ecec).

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings (the "First Day Hearing") has been scheduled for April 13, 2022 at 3:00 p.m. (ET) before the Honorable John T. Dorsey via Zoom. Individuals wishing to participate in the First Day Hearing via Zoom must register at least two (2) hours in advance of the hearing using the following link: https://debuscourts.zoomgov.com/meeting/register/vJltduqvpjovGPsbcXQXjbunpa8Lk1Z8Xnk.

Dated: April 12, 2022

Wilmington, Delaware

Respectfully submitted,

/s Christopher A. Ward_

POLSINELLI PC

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