

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

IN RE:  KNIGHT ENERGY HOLDINGS, LLC, <i>ET AL.</i> <sup>1</sup>  DEBTORS	CASE NO. 17-51014  (JOINT ADMINISTRATION REQUESTED)  CHAPTER 11  CHIEF JUDGE ROBERT SUMMERHAYS
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**MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE  
DEBTORS TO (I) FILE A CONSOLIDATED LIST OF THE DEBTORS'  
30 LARGEST UNSECURED CREDITORS, (II) FILE A CONSOLIDATED  
LIST OF CREDITORS, AND (III) MAIL NOTICES**

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Knight Energy Holdings, LLC; Knight Oil Tools, LLC; Knight Manufacturing, LLC; KDCC, LLC f/k/a Knight Well Services, LLC; Tri-Drill, LLC; Advanced Safety & Training Management, LLC; Knight Security, LLC; Knight Information Systems, LLC; El Caballero Ranch, Inc.; Rayne Properties, LLC; Knight Aviation, LLC; Knight Research & Development, LLC; Knight Family Enterprises, LLC; HMC Leasing, LLC; and HMC Investments, LLC (collectively, the “Debtors”), as debtors-in-possession, file this *Motion for Entry of an Order Authorizing the Debtors to (I) File a Consolidated List of the Debtors’ 30 Largest Unsecured*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Knight Energy Holdings, LLC (1930) (Case No. 17-51014); Knight Oil Tools, LLC (2667) (Case No. 17-51015); Knight Manufacturing, LLC (0600) (Case No. 17-51016); KDCC, LLC, f/k/a Knight Well Services, LLC (4156) (Case No. 17-51017); Tri-Drill, LLC (4957) (Case No. 17-51018); Advanced Safety & Training Management, LLC, (0510) (Case No. 17-51019); Knight Security, LLC (0923) (Case No. 17-51020); Knight Information Systems, LLC (0000) (Case No. 17-51021); El Caballero Ranch, Inc. (7345) (Case No. 17-51022); Rayne Properties, LLC (0000) (Case No. 17-51023); Knight Aviation, LLC (3329) (Case No. 17-51024); Knight Research & Development, LLC (3760) (Case No. 17-51025); Knight Family Enterprises, LLC (7190) (Case No. 17-51026); HMC Leasing, LLC (0814) (Case No. 17-51027) and HMC Investments, LLC (0000) (Case No. 17-51029). The Debtors’ service address is 2272 SE Evangeline Thruway, Lafayette, Louisiana 70508 other than Knight Manufacturing, LLC and Advanced Safety & Training Management, LLC. Knight Manufacturing, LLC’s service address is 2810-A Melancon Road, Broussard, Louisiana 70518 and Advanced Safety & Training Management, LLC’s service address is 1042 Forum Drive, Broussard, Louisiana 70518.

*Creditors, (II) File a Consolidated List of Creditors, and (III) Mail Notices* (the “Motion”) and respectfully represent as follows:

**Jurisdiction and Venue**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**Background**

2. On this date (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under Chapter 11 of title 11 of the U.S. Code (the “Bankruptcy Code”). The Debtors continue to manage and operate their businesses as debtors-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. An official committee of unsecured creditors has yet to be appointed in these Chapter 11 cases. Further, no trustee or examiner has been requested or appointed in any of these Chapter 11 cases.

4. The Debtors have filed with the Court the *Statement of Background Information and Declaration in Support of Debtors’ Chapter 11 Petitions and First-Day Motions* which is incorporated by reference in this Motion.

**Relief Requested**

5. By this Motion, the Debtors request entry of an order authorizing the Debtors to (a) file a consolidated list of the Debtors’ 30 largest unsecured creditors, (b) file a consolidated list of all creditors, and (c) mail the initial notices through the Proposed Notice and Claims Agent (as defined below).

### **Basis for Relief Requested**

6. Contemporaneously with the filing of this motion, the Debtors are seeking to retain Donlin, Recano & Company, Inc. as their notice and claims agent in these chapter 11 cases (the “Proposed Notice and Claims Agent”).<sup>2</sup> If such application is granted, the Proposed Notice and Claims Agent will, among other things, (a) assist with the consolidation of the Debtors’ computer records into a creditor database and (b) complete the mailing of notices to the parties in such database.

7. Specifically, the Debtors propose that the Proposed Notice and Claims Agent undertake all mailings directed by the Court, the United States Trustee for Region 5 (the “U.S. Trustee”) or as required by the Bankruptcy Code, including, without limitation, the notice of commencement of these Chapter 11 cases. The Debtors believe that using the Proposed Notice and Claims Agent for this purpose will maximize efficiency in administering these cases and will ease administrative burdens that otherwise fall upon the Court and the U.S. Trustee. Additionally, the Proposed Notice and Claims Agent will assist the Debtors in preparing creditor lists and mailing initial notices.

8. After consultation with the Proposed Notice and Claims Agent, the Debtors believe that preparing the consolidated list will be sufficient to permit the Proposed Notice and Claims Agent to promptly provide notices to all applicable parties. Accordingly, the Debtors believe it will maximize efficiency and accuracy and reduce costs, to maintain electronic lists of creditors rather than preparing and filing separate matrices.

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<sup>2</sup> The request to retain the Proposed Notice and Claims Agent is made pursuant to section 156(c) of title 28 of the United States Code, which empowers the Court to use outside facilities or services pertaining to the provisions of notice to the administrative information to parties in interest so long as the costs of the services are paid for out of assets of the estate. *See* 28 U.S.C. § 156(c).

**A. Request for Authority to File Consolidated List of 30 Largest Unsecured Creditors**

9. Pursuant to Bankruptcy Rule 1007(d), a chapter 11 debtor must file with its voluntary petition a list setting forth the names, addresses and claim amounts of the creditors, excluding insiders, that hold the 20 largest unsecured claims in the debtor's case (the "Top 20 List"). This Top 20 List is primarily used by the United States Trustee (the U.S. Trustee") to evaluate the types and amounts of unsecured claims against the debtor and thus identify potential candidates to serve on the official committee of unsecured creditors appointed in the debtor's case under Bankruptcy Code § 1102.

10. The Debtors, while separate legal entities, are jointly indebted to certain creditors. Because the Debtors are jointly indebted on certain debts, requiring the Debtors to file a separate Top 20 List in each of their respective cases would generate 15 lists with duplicate entries. The Debtors do not believe that such duplicative filings would facilitate the U.S. Trustee's review of creditors' claims or its appointment of a creditors' committee in these cases.

11. In light of the following, the Debtors seek authority to file a single, consolidated list of the 30 largest unsecured creditors for the Debtors.

**B. Request for Authority to File Consolidated List of Creditors**

12. Pursuant to Local Rule 1007-2, a chapter 11 debtor must file with its voluntary petition a mailing matrix (the "Mailing Matrix") containing the names and addresses of all creditors. This Mailing Matrix is used throughout the case to serve various notices and pleadings on all creditors and parties in interest.

13. The Debtors, while separate legal entities, are indebted to many of the same creditors. Accordingly, requiring the Debtors to file a separate Mailing Matrix in each of their respective cases would generate 15 lists with duplicate entries. The Debtors do not believe that

such duplicative filings would facilitate the Court or the Potential Notice and Claims Agent in their mailings, since such lists would contain numerous duplicate entries. One consolidated Mailing Matrix in these cases would ensure that all creditors and parties in interest receive notice of all pleadings to which they are entitled.

**C. Request for Authority to Mail Notices**

14. As stated above, the Debtors propose that the Potential Notice and Claims Agent undertake all mailings directed by this Court, the U.S. Trustee or as required by the Bankruptcy Code, including, the notice of commencement of these chapter 11 cases. The Potential Notice and Claims Agent's assistance with mailing and preparation of creditor lists and notices will ease administrative burdens that otherwise would fall upon this Court and the U.S. Trustee. With such assistance, the Debtors will be capable of undertaking all necessary mailings

15. Granting the relief requested by the Debtors is appropriate under the circumstances because of the intertwined nature of the Debtors' indebtedness.

16. The Debtors believe that such relief not only is appropriate under the circumstances, but necessary for the efficient and orderly administration of these cases.

**Notice**

17. Notice of this Motion has been provided to: (i) the Office of the United States Trustee; (ii) the Debtors and their counsel; (iii) Clearlake Capital Group, L.P. and/or its counsel; (iv) Cantor Fitzgerald Securities and/or its counsel; (v) Whitney National Bank and/or its counsel; (vi) JP Morgan Chase Bank and/or its counsel; (vii) Iberia Bank and/or its counsel; (viii) all other secured creditors, (ix) any party whose interests are directly affected by this specific pleading; (x) those persons who have formally appeared and requested notice and service in these proceedings pursuant to Bankruptcy Rules 2002 and 3017; (xi) counsel for and the members of any official committees appointed by this Court; (xii) the consolidated 30 largest

unsecured creditors of the Debtors; and (xiii) all governmental agencies having a regulatory or statutory interest in these cases. No other or further notice need be provided.

**WHEREFORE** the Debtors respectfully request that the Court (i) grant the Motion and (ii) grant such other and further relief as is just and proper.

Dated: August 8, 2017.

Respectfully submitted,

/s/ William H. Patrick, III  
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**PROPOSED COUNSEL FOR DEBTORS**