

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

IN RE:

KNIGHT ENERGY HOLDINGS, LLC, *ET AL.*¹

DEBTORS

CASE NO. 17-51014

(JOINT ADMINISTRATION REQUESTED)

CHAPTER 11

CHIEF JUDGE ROBERT SUMMERHAYS

¹ 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.

ORDER (A) ESTABLISHING A BAR DATE AND GOVERNMENTAL BAR DATE FOR FILING OF PROOFS OF CLAIM, INCLUDING CLAIMS ARISING UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE (B) APPROVING THE BAR DATE NOTICE, AND (C) AUTHORIZING THE DEBTORS TO PROVIDE NOTICE OF THE BAR DATE AND (D) PROVIDING OTHER RELIEF

Considering the *Motion for an Order (A) Establishing a Bar Date and Governmental Bar Date for Filing of Proofs of Claim, including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code (B) Approving the Bar Date Notice and (C) Authorizing the Debtors to Provide Notice of the Bar Date and (D) Providing for Other Relief Sought Herein [P-___]* (“Motion”) filed by the above captioned debtors and debtors-in-possession (collectively, the “Debtors”), and after due deliberation, and sufficient cause existing to grant the Motion and appearing due notice being provided and no further notice is necessary;

IT IS ORDERED that the Motion is **GRANTED**;

IT IS FURTHER ORDERED that **September 29, 2017 at 4:30 PM Prevailing Central Time** is established as the **Bar Date** for filing proofs of claim (the “Bar Date”) for all persons or entities, including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, and trust;

IT IS FURTHER ORDERED that **February 5, 2018 at 4:30 PM Prevailing Central Time** is established as the **Governmental Bar Date** for filing proofs of claim (the “Bar Date”) for governmental units;

IT IS FURTHER ORDERED that each person or entity, including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, trust and/or governmental unit that asserts an unpaid Claim (as defined in the Bankruptcy Code) against the Debtors, including, for the avoidance of doubt, but not limited to, secured claims, priority claims, claims arising under section 503(b)(9) of the Bankruptcy Code, claims for taxes,

accounts payable, alleged torts, and/or claims arising from or under pre-petition contracts, leases or agreements, that arose before the Petition Dates (“Pre-Petition Claim”), regardless of whether such Pre-Petition Claim is contingent, disputed, inchoate or unliquidated, is required to file a written proof of claim which substantially conforms to Official Form No. 10 to the Federal Rules of Bankruptcy Procedure, so as to be received on or before the Bar Date, or if a governmental unit, on or before the Governmental Bar Date, either electronically or by mail or delivery by hand, courier, or overnight service to the offices of the clerk of this Court.

IT IS FURTHER ORDERED that each claimant must file a proof of claim in the Debtor’s bankruptcy case for which it asserts a claim **AGAINST THAT PARTICULAR DEBTOR**.

IT IS FURTHER ORDERED that, notwithstanding the foregoing, the holders of the following Pre-Petition Claims (collectively, the “Excluded Claims”) are not required to file a proof of claim and are not subject to the Bar Date or Governmental Bar Date:

- A. Any holder of a Pre-Petition Claim who has already filed a proof of claim against a Debtor with the Clerk of this Court in the proper bankruptcy case utilizing the claim form which substantially conforms to Official Form No. 10;
- B. Any holder of a Pre-Petition Claim (i) whose claim is listed on the Debtors’ schedules of liability (“Schedules”); and (ii) whose claim is not described in such Schedules as “disputed,” “contingent,” or “unliquidated;” and (iii) for which the holder does not dispute the amount, priority, status, or nature of such Pre-petition Claim as set forth in the Schedules; and (iv) for which the holder does not dispute that the Pre-

Petition Claim as set forth in the Schedules is an obligation of the specific Debtor against which the Claim is listed on the Schedules;

- C. Any holder of a Pre-Petition Claim which Pre-Petition Claim has been paid by the Debtors with the authorization of this Court;
- D. Any holder of Pre-Petition Claim that has been fixed and allowed by an order of this Court entered on or before the Bar Date or the Governmental Bar Date;
- E. Any Debtor having a Pre-Petition Claim against another Debtor or any of the non-debtor subsidiaries (whether direct or indirect);
- F. Any holder of a Pre-Petition Claim based on an equity interest in any of the Debtors; and
- G. Any holder of a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration incurred in the ordinary course, *provided however*, that any person or entity asserting a claim entitled to priority under Section 503(b)(9) of the Bankruptcy Code must assert such claims by filing a claim on or prior to the Bar Date or Governmental Bar Date, as applicable.

IT IS FURTHER ORDERED that the form of the Bar Date Notice attached hereto is **APPROVED**.

IT IS FURTHER ORDERED the Debtors are directed to provide actual notice of the Bar Date by mailing the Bar Date Notice, together with a proof of claim form, to the following:

- A. The Office of the United States Trustee;

- B. Each member of any committee appointed pursuant to the Bankruptcy Code, and any attorneys for such committee;
- C. Any holder of Pre-Petition Claims listed on the Schedules at the addresses stated therein;
- D. Any party to an executory contract listed in the Debtors' Schedules;
- E. Any party listed on the mailing matrix;
- F. The district director of the Internal Revenue for the Western District of Louisiana, and all taxing authorities for the jurisdictions in which the Debtors conduct business;
- G. The Securities and Exchange Commission; and
- H. All persons and entities requesting notice, pursuant to Bankruptcy Rule 2002.

IT IS FURTHER ORDERED that that any holder of a Pre-Petition Claim, other than with respect to Excluded Claims, who fails to file a proof of claim by the Bar Date or Governmental Bar Date shall be forever barred, estopped and permanently enjoined from asserting such claim, whether directly or indirectly against any of the Debtors and their successors, assigns and/or property.

IT IS FURTHER ORDERED that in the event the Debtors amend their Schedules and amend a Pre-Petition Claim which was initially listed as non-contingent, liquidated, and/or undisputed, the holder of such Pre-Petition Claim affected by the amended Schedules shall be afforded an extension of thirty (30) days from the date of such notice of amendment to file a proof of claim.

IT IS FURTHER ORDERED that in the event the Debtors amend their Schedules, the holder of any claim affected by the amended Schedules shall be afforded an extension of thirty (30) days from the date of such notice of amendment to file a proof of claim.

###

This order was prepared and is being submitted by:

/s/

Douglas S. Draper (LA #5073)
William H. Patrick, III (La. Bar No. 10359)
Tristan E. Manthey, (La. Bar No. 24539)
Cherie Dessauer Nobles, (La. Bar No. 30476)
Heller, Draper, Patrick, Horn & Dabney, L.L.C.
650 Poydras Street, Suite 2500
New Orleans, Louisiana 70130-6175
Telephone: 504-299-3300 // Fax: 504-299-3399
Proposed Counsel for Debtors