

**IN 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

**DEBTORS' MOTION FOR EMERGENCY CONSIDERATION OF
CERTAIN FIRST DAY MOTIONS**

NOW INTO COURT, through undersigned counsel, comes debtors and debtors-in-possession 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"), who file this Motion for Emergency Consideration of the following:

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.

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- a. Emergency Motion for Order Under Bankruptcy Rule 1015(b) Directing Joint Administration of Chapter 11 Cases [ECF Doc. 2];
- b. Motion to Limit Notice [ECF Doc. 3];
- c. 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 [ECF Doc. 4];
- d. Motion for Entry of an Order Authorizing Debtors (A) to Pay All Outstanding Pre-Petition Wages, Salaries, Other Accrued Compensation, Expense Reimbursements, Benefits, and Related Amounts; and (B) to Continue Specified Benefit Programs in the Ordinary Course of Business [ECF Doc. 5];
- e. Motion for Entry of an Order Under 11 U.S.C. §§ 105 and 363(c) Authorizing the Debtors to Pay Insurance Premium Financing Payments and Related Relief [ECF Doc. 6];
- f. Motion for Entry of an Order Under 11 U.S.C. §§105(a), 363(b), 507(a)(8) and 541 (I) Authorizing Debtors to Pay Taxes and Fees and (II) Directing Financial Institutions to Honor and Process Cash Related Checks and Transfers [ECF Doc. 7];
- g. Motion for Interim and Final Orders Under §§ 105(a) and 366 (I) Prohibiting Utility Companies from Altering or Discontinuing Service, (II) Determining that the Utility Companies Are Adequately Assured of Future Payment; and (III) Establishing Procedures for Determining Requests for Additional Assurance [ECF Doc. 8];
- h. Debtors' Motion for Entry of an Order Authorizing Compensation and Payments to Insiders [ECF Doc. 9];
- i. Motion for an Order (I) Approving Continued Use of Cash Management System, (II) Authorizing Maintenance of Pre-Petition Bank Accounts and Continued Use of Existing Business Forms, and (III) Waiving the Requirements of Bankruptcy Code §345(b) [ECF Doc. 10];
- j. Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay or Honor Prepetition Obligations to Critical Vendors [ECF Doc. 11];
- k. Motion for Entry of Interim and Final Orders Authorizing Payment of Claims on Account of Mineral Contractor Liens That May be Filed Against the Debtors' Customers and Granting Related Relief [ECF Doc. 12];

- l. Application by Debtors for Entry of an Order Authorizing the Employment and Retention of Heller, Draper, Patrick, Horn & Dabney LLC Nunc Pro Tunc to the Petition Date [ECF Doc. 13];
- m. Application of the Debtors Pursuant to Section 363(b) of the Bankruptcy Code to Employ and Retain (I) Opportune LLP as Crisis Managers and (II) Gary L. Pittman as Chief Restructuring Officer and Certain Additional Personnel, In Each Instance Nunc Pro Tunc to the Petition Date [ECF Doc. 15];
- n. Application for an Order Appointing Donlin, Recano & Company, Inc. Nunc Pro Tunc as of the Petition Date as Claims, Noticing, and Solicitation Agent for the Debtors Pursuant to 28 U.S.C. [ECF Doc. 16];
- o. Motion for Administrative Order Under Bankruptcy Code Sections 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF Doc. 17];
- p. Debtors' Motion for an Order Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Post-Petition Financing, (C) Granting Security Interests and Superpriority Administrative Expense Status to the DIP Agent and the DIP Lenders, (D) Granting Adequate Protection to Existing Lienholders, (E) Scheduling a Final Hearing, and (F) Granting Related Relief [ECF Doc. 18];
- q. 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, (C) Authorizing the Debtors to Provide Notice of the Bar Date, and (D) Providing for Other Relief Sought Herein [ECF Doc. 19]

(collectively, the “First Day Motions” and each a “First Day Motion”). In support, the Debtors respectfully represent:

1. This Court has jurisdiction over this motion and the First Day Motions, and the relief requested herein under 28 U.S.C. § 1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The First Day Motions involve “core” proceedings pursuant to 28 U.S.C. § 157(b)(2).

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 United States Code 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”).

3. The Debtors remain in possession of their property and are managing their businesses as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

4. No trustee has been appointed and no official committee has been established in these cases.

5. 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* (the “First Day Declaration”), which is incorporated by reference in this Motion.²

6. The Debtors request the entry of an order setting expedited hearings on the First Day Motions for **AUGUST 9, 2017 AT 2:00 P.M. C.S.T.**, at the United States Bankruptcy Court for the Western District of Louisiana, Lafayette Division, 214 Jefferson Street, Lafayette, LA 70501.

7. 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

² All capitalized terms not specifically defined herein shall have the meaning ascribed to such terms in the First Day Declaration.

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.

8. The Debtors submit that the parties receiving notice should be allowed to raise any objection to the relief requested herein or in the First Day Motions, orally, at hearing.

WHEREFORE, the Debtors request that this Court enter an order setting a hearing on the First Day Motions for **AUGUST 9, 2017 AT 2:00 P.M. C.S.T.**, or at such time convenient to the Court for consideration of the First Day Motions, at the United States Bankruptcy Court for the Western District of Louisiana, Lafayette Division, 214 Jefferson Street, Lafayette, LA 70501, that this Court allow parties to raise any objection to the relief requested in the First Day Motions, orally, at hearing, and for such other relief as this Court may deem appropriate.

Respectfully submitted,

/s/ Tristan Manthey

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