

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

	§	
	§	
In re	§	Chapter 11
	§	
EXPRESS ENERGY SERVICES	§	
OPERATING, LP, <i>et al.</i> ,	§	Case No. 09-____ (____)
	§	
	§	
Debtors.	§	
	§	
	§	Joint Administration Requested

DEBTORS’ EMERGENCY MOTION FOR (I) APPROVAL OF PROCEDURES TO NOTIFY CREDITORS OF THE COMMENCEMENT OF THE DEBTORS’ CHAPTER 11 CASES AND THE MEETING OF CREDITORS AND (II) AUTHORITY TO ESTABLISH THE MASTER SERVICE LIST APPLICABLE TO THE DEBTORS’ CHAPTER 11 CASES

Express Energy Services Operating, LP (“**EES**”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”),¹ file this emergency motion (the “**Motion**”) for entry of an order (i) approving procedures to notify creditors of the Debtors’ bankruptcy cases and the meeting of creditors (the “**341 Meeting of Creditors**”) and (ii) establishing the master service list applicable to the Debtors’ cases and respectfully represent as follows:

I.

BACKGROUND

1. On the date hereof (the “**Commencement Date**”), each of the Debtors filed a voluntary petition for relief under the Bankruptcy Code. The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of chapter 11 of title 11 of the United States Code (the

¹ A list of the Debtors in these chapter 11 cases is attached hereto as **Exhibit A**.

“Bankruptcy Code”). Contemporaneously herewith, the Debtors filed a motion seeking joint administration of their chapter 11 cases pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the **“Bankruptcy Rules”**).

2. Information regarding the Debtors’ business and events leading to the Debtors’ bankruptcy filings can be found in the Declaration of Darron Anderson in Support of the Debtors’ Chapter 11 Petitions and First Day Motions, filed contemporaneously herewith.

II.

JURISDICTION

3. This Court has jurisdiction to consider this Motion 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 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

III.

RELIEF REQUESTED

4. Pursuant to section 105(a) of the Bankruptcy Code, the Debtors request the entry of an order, substantially in the form of **Exhibit C** attached hereto, authorizing the Debtors to (i) establish certain procedures (the **“Procedures”**) for notifying creditors of the commencement of the Debtors’ chapter 11 cases and of the 341 Meeting of Creditors, including the form of such notice (the **“Notice of Commencement”**), and (ii) authority to establish the master service list (the **“Master Service List”**) to be used in these cases. The proposed form of Notice of Commencement is annexed hereto as **Exhibit B**.

IV.

BASIS FOR RELIEF REQUESTED

A. **Notice of Commencement**

5. Section 341(a) of the Bankruptcy Code requires, in part, that within a “reasonable” time after the Commencement Date, the first meeting of creditors will be held. Moreover, Bankruptcy Rule 2002(a) provides that the clerk, “or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 20 days’ notice by mail of the meeting of creditors under § 341 or § 1104(b) of the Code. . .” Finally, section 105(a) of the Bankruptcy Code also empowers the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a).

6. The proposed Notice of Commencement provides notice of (i) the commencement of the Debtors chapter 11 cases and (ii) the time and location of the 341 Meeting of Creditors. The Debtors have filed a separate application to retain The Garden City Group, Inc. to serve as the claims and noticing agent in these chapter 11 cases (the “**Notice and Claims Agent**”). The Debtors request that the Court authorize the proposed Notice and Claims Agent to mail the Notice of Commencement after the 341 Meeting of Creditors has been scheduled. Service of the Notice of Commencement, through the Notice and Claims Agent or otherwise, will avoid confusion among creditors and prevent the Debtors from incurring the unnecessary costs associated with serving multiple notices to the parties listed on the Debtors’ creditors’ matrix.

B. Notification Procedures and Establishment of a Consolidated Master Service List

7. Potentially thousands of creditors and parties in interest may be entitled to receive notice in these chapter 11 cases. As such, notice of all documents filed in these cases to each creditor and party in interest would be extremely burdensome and costly to the Debtors' estates. Therefore, the Debtors propose to establish a consolidated Master Service List that would include:

- a. the Office of the United States Trustee for the Southern District of Texas;
 - b. the Debtors;
 - c. Weil, Gotshal & Manges LLP (Attn: Alfredo R. Pérez and Christopher M. López), proposed attorneys for the Debtors;
 - d. Credit Suisse, as administrative agent for (a) the Debtors' prepetition secured lenders under the Credit Agreement dated as of July 11, 2008, as amended, and (b) the Swap Agreement dated as of July 11, 2008;
 - e. Akin Gump Strauss Hauer & Feld (Attn: J. Michael Chambers and Charles R. Gibbs), attorneys for Credit Suisse;
 - f. the Debtors' 20 largest unsecured creditors;
 - g. all governmental agencies required to receive notice under the Bankruptcy Rules and the Bankruptcy Local Rules for the Southern District of Texas; and
 - h. those persons or entities that formally appear and request service pursuant to Bankruptcy Rule 2002.
8. The initial Master Service List will be filed with the Court within three (3)

calendar days after the entry of an order approving this Motion. The Debtors will periodically update the Master Service List to include the name and address of any party in interest who has made a written request for notice. The Master Service List will contain addresses and facsimile numbers, and may include e-mail addresses. The Debtors propose to have the sole discretion to serve the parties on the Master Service List by U.S. Mail, e-mail, or facsimile. Finally, the Debtors request that, upon the completion of noticing any particular matter, the party seeking relief shall file with the Court either an affidavit of service or a certification of service attaching

the list of parties that received notice.

9. The Debtors submit that the relief requested herein is appropriate in these chapter 11 cases and is within the Court's equitable powers under section 105 of the Bankruptcy Code.

V.

NOTICE

10. The Debtors have served notice of this Motion on (i) the Office of the United States Trustee for the Southern District of Texas; (ii) Credit Suisse, as administrative agent for (a) the Debtors' prepetition secured lenders under the Credit Agreement dated as of July 11, 2008, as amended, and (b) the Swap Agreement dated as of July 11, 2008; (iii) Akin Gump Strauss Hauer & Feld (Attn: J. Michael Chambers and Charles R. Gibbs), attorneys for Credit Suisse; (iv) the Debtors' 20 largest unsecured creditors (on a consolidated basis); and (v) all applicable government agencies, to the extent required by the Bankruptcy Rules or the Bankruptcy Local Rules for the Southern District of Texas. The Debtors submit that no other or further notice need be provided.

WHEREFORE, the Debtors request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: October 27, 2009
Houston, Texas

/s/ Alfredo R. Pérez
Alfredo R. Pérez (15776275)

WEIL, GOTSHAL & MANGES LLP
700 Louisiana Street, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A**LIST OF DEBTORS**

Debtor	Last Four Digits of Federal Tax I.D. No.
Express Energy Services Operating, LP	7644
Express Energy Services (2008) LLC	3087
Express Energy Services Holding, LP	7122
Express Energy Services GP, LLC	7083
Express Energy Services CT, LP	8432
Express Energy Services Ark, LP	5287
Express Energy Services P&A, LP	8402
Express Energy Services WL, LP	2834
Express – Byrd R&S GP, LLC	7556
Express – Byrd R&S Oilfield Services, L.P.	7580
Express – MBCC GP, LLC	0760
Express – MBCC, Ltd.	0802
Express – Mike Byrd Casing Crews GP, LLC	0852
Express – Mike Byrd Casing Crews, Ltd.	0938
Express – R&S Tong Services GP, LLC	2230
Express – R&S Tong Services, Ltd.	7465
Express – BAH Leasing GP, LLC	0510
Express – BAH Leasing, Ltd.	0708
D&D Tongs GP, LLC	6566
D&D Tongs, L.P.	6586
Express – North Trail Oilfield Services, GP, LLC	7506
Express – North Trail Oilfield Services, Ltd.	7526
Express – Ace Rat Hole Service GP, LLC	6617
Express – Ace Rat Hole Service, Ltd.	6632

EXHIBIT B

NOTICE OF COMMENCEMENT

UNITED STATES BANKRUPTCY COURT, SOUTHERN DISTRICT OF TEXAS

In re:

**Express Energy Services Operating, LP, et al.,
Debtors.**

Chapter 11 Case No:

09-_____ () (Jointly Administered)

NOTICE OF CHAPTER 11 BANKRUPTCY CASES, MEETING OF CREDITORS, AND DEADLINES

Chapter 11 bankruptcy cases concerning the debtors listed below were filed on October 27, 2009. You may be a creditor of one of the debtors. **This notice lists important deadlines.** You may want to consult an attorney to protect your rights. All documents filed with the Court, including lists of the debtors' properties and debts, are available for inspection at the office of the clerk of the Bankruptcy Court and the Court's website, www.txsb.uscourts.gov. Note that a PACER password is needed to access documents on the Court's website (a PACER password may be obtained by accessing the PACER website, <http://pacer.psc.uscourts.gov>).

Name of Debtor	Case No.	Tax Identification Number
Express Energy Services Operating, LP	09-	20-4737644
Express Energy Services (2008) LLC	09-	26-3063087
Express Energy Services Holding, LP	09-	20-4737122
Express Energy Services GP, LLC	09-	20-4737083
Express Energy Services CT, LP	09-	20-4948432
Express Energy Services Ark, LP	09-	20-5645287
Express Energy Services P&A, LP	09-	20-4948402
Express Energy Services WL, LP	09-	26-1342834
Express—Byrd R&S GP, LLC	09-	20-8487556
Express—MBCC GP, LLC	09-	20-8490760
Express—MBCC, Ltd.	09-	20-8490802
Express—Mike Byrd Casing Crews GP, LLC	09-	20-8490852
Express—Mike Byrd Casing Crews, Ltd.	09-	20-8490938
Express—R&S Tong Services GP, LLC	09-	20-8482230
Express—R&S Tong Services, Ltd.	09-	20-8487465
Express—BAH Leasing GP, LLC	09-	20-8490510
Express—BAH Leasing, Ltd.	09-	208490708
D&D Tongs GP, LLC	09-	20-8496566
D&D Tongs, L.P.	09-	20-8496586
Express—North Trail Oilfield Services, GP, LLC	09-	20-8487506
Express—North Trail Oilfield Services, Ltd.	09-	20-8487526
Express—Ace Rat Hole Service, GP LLC	09-	20-8496617
Express—Ace Rat Hold Service, Ltd.	09-	20-8496632

Attorneys for Debtors and Debtors in Possession

WEIL, GOTSHAL & MANGES LLP
700 Louisiana Street, Suite 1600
Houston, Texas 77002-2784
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Alfredo R. Pérez, Esq.
Christopher M. López, Esq.

**DATE, TIME, AND LOCATION OF
MEETING OF CREDITORS**

**PURSUANT TO BANKRUPTCY CODE
SECTION 341(a)**

_____, 2009 at __:__.m. (Houston Time)
515 Rusk Street, Suite _____ (____ floor)
Houston, Texas 77002

DEADLINE TO FILE A PROOF OF CLAIM	
None at this time. When the Court sets a claims deadline, you will be notified and provided a proof of claim form by mail.	
DEADLINE TO FILE A COMPLAINT TO DETERMINE DISCHARGEABILITY OF CERTAIN DEBTS	
Notice of deadline will be sent a later time	
CREDITORS MAY NOT TAKE CERTAIN ACTIONS	
In most instances, filing a bankruptcy case automatically stays collection and other actions against the debtors and the debtors' property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtors can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the bankruptcy code, you may be penalized. Common examples of prohibited actions by creditors are contacting the debtors to demand repayment, taking action against the debtors to collect money owed to creditors or to take property of the debtors, and starting or continuing collection actions, foreclosure actions, or repossessions. Consult a lawyer to determine your rights.	
Filing of Chapter 11 Bankruptcy Case	A bankruptcy case under chapter 11 of the Bankruptcy Code (title 11, United States Code) has been filed in this Court by each of the debtors named above, and an order for relief has been entered. Chapter 11 allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the court. You may be sent a copy of the plan and disclosure statement telling you about the plan, and you might have an opportunity to vote on the plan. You will be sent a notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is appointed, the debtors will remain in possession of the debtors' property and may continue to operate their business.
Legal Advice	The staff of the bankruptcy clerk's office or the United States' Trustees office cannot give legal advice. Consult a lawyer to determine your rights in this case.
Meeting of Creditors	A meeting of creditors is scheduled for the date, time, and location listed above. <i>The debtors' representative must be present at the meeting to be questioned under oath by the trustee and by creditors.</i> Creditors are welcome to attend, but are not required to do so. The meeting may be continued and concluded at a later date without further notice. The court, after notice and a hearing, may order that the United States Trustee not convene the meeting if the debtor filed a plan for which the debtor solicited acceptances before filing the case.
Notice	You will not receive notice of all documents filed in these chapter 11 cases. On October 27, 2009, the Court entered its Order (I) Approving Procedures to Notify Creditors of the Commencement of the Debtors' Chapter 11 Cases and the Meeting of Creditors and (II) Establishing a Master Service List Applicable to the Debtors' Chapter 11 Cases (the " Notice Procedures Order "). The Notice Procedures Order describes the notice procedures that apply in these chapter 11 cases. All parties who desire to participate in these chapter 11 cases must follow the procedures set forth in the Notice Procedures Order. Parties can obtain a copy of the Notice Procedures Order and all other documents filed electronically with the Court in these cases, including lists of the Debtors' property and debts, by: (i) contacting the Clerk of the Court at 515 Rusk Street, Houston, Texas 77002; (ii) accessing the Court's website at www.txsb.uscourts.gov . Note that a PACER (http://www.pacer.psc.uscourts.gov) password and login are needed to access documents on the Court's website; (iii) accessing the Claims Agent website at www.expressenergyinfo.com ; or (iv) contacting the Debtors' counsel at: Weil, Gotshal & Manges, LLP, 700 Louisiana Street, Suite 1600, Houston, Texas 77002 (Attn: Alfredo R. Pérez and Christopher M. López).
Claims	Schedules of claims and other liabilities will be filed pursuant to Bankruptcy Rule 1007. Any creditor holding a scheduled claim that is not identified as disputed, contingent, or unliquidated as to amount may, but is not required to, file a proof of claim in these cases. Creditors whose claims are not scheduled or whose claims are scheduled as disputed, contingent, or unliquidated as to amount and who desire to participate in these cases or share in any distribution must file a proof of claim. A creditor who relies on any schedule of liabilities has the responsibility for determining that the claim is listed accurately. A form

	of proof of claim and notice of the deadline for filing such proof of claim will be sent to you later. A deadline for the last day to file proofs of claim has not yet been established.	
Discharge of Debts	Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. <i>See</i> Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtors, except as provided in the plan. If you believe that a debt owed to you is not dischargeable under Bankruptcy Code § 1141(d)(6), you must start a lawsuit by filing a complaint in the bankruptcy clerk’s office by the “Deadline to File a Complaint to Determine Dischargeability of Certain Debts” listed above. The bankruptcy clerk’s office must receive the objection by the “Deadline to File a Complaint to Determine Dischargeability of Certain Debts” listed on the front side.	
Bankruptcy Clerk’s Office	Any paper that you file in these bankruptcy cases should be filed at the bankruptcy clerk’s office at the address listed below. You may inspect all papers filed, including the list of the debtor’s property and debts and the list of the property claimed as exempt, at the bankruptcy clerk’s office.	
Foreign Creditors	Consult a lawyer familiar with United States bankruptcy law if you have any questions regarding your rights in this case.	
<u>Address of the Clerk of the Bankruptcy Court</u> Clerk of the United States Bankruptcy Court, 515 Rusk Street Houston, Texas 77002		For the Court: _____ Clerk of the Bankruptcy Court Hours Open: 8:00 a.m. – 5:00 p.m. Monday through Friday
Refer to the other side for Important Deadlines and Notices.		

EXHIBIT C

PROPOSED ORDER

circumstances and that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is ORDERED that

1. The relief requested in the Motion is GRANTED to the extent provided herein.
2. All documents filed in the Debtors' chapter 11 cases shall be served in the manner described herein on the parties listed on the Master Service List (as described below).
3. Any party in interest that desires to receive notice in these cases, and is not otherwise entitled to notice pursuant to this Order, shall file a notice of appearance ("**Notice of Appearance**") and request for service in accordance with Bankruptcy Rule 2002. The Notice of Appearance shall include the following information: (a) the party's name and address; (b) the name of the client, if applicable; (c) an e-mail address at which the requesting party may be served; (d) an address by which the requesting party may be served by U.S. mail, hand delivery and overnight delivery; and (e) a facsimile number for the requesting party. Notwithstanding Bankruptcy Rule 2002, no request for service filed in these Cases shall be honored unless the foregoing requirements are satisfied.
4. The Debtors shall maintain a Master Service List, which shall include:
 - a. the Office of the United States Trustee for the Southern District of Texas;
 - b. the Debtors;
 - c. Weil, Gotshal & Manges LLP (Attn: Alfredo R. Pérez, Esq. and Christopher M. López, Esq.), proposed attorneys for the Debtors;
 - d. Credit Suisse, as administrative agent for (a) the Debtors' prepetition secured lenders under the Credit Agreement dated as of July 11, 2008, as amended, and (b) the Swap Agreement dated as of July 11, 2008;

- e. Akin Gump Strauss Hauer & Feld (Attn: J. Michael Chambers, Esq.), attorneys for Credit Suisse;
 - f. the Debtors' 20 largest unsecured creditors;
 - g. all governmental agencies required to receive notice under the Bankruptcy Rules and the Bankruptcy Local Rules for the Southern District of Texas; and
 - h. those persons or entities that formally appear and request service pursuant to Bankruptcy Rule 2002.
5. The Master Service List shall contain addresses and facsimile numbers, and may include e-mail addresses.
6. The Debtors shall have the sole discretion to serve the parties on the Master Service List by U.S. Mail, e-mail, or facsimile.
7. The Debtors will periodically update the Master Service List to include the name and address of any party in interest who has made a written request for notice.
8. Upon the completion of noticing any particular matter, the party seeking relief shall file with the Court either an affidavit of service or a certification of service attaching the list of parties that received notice.
9. The Notice of Commencement attached hereto as **Exhibit A** is reasonably calculated to inform interested parties of these chapter 11 cases and hereby approved.
10. The Debtors are directed to mail the Notice of Commencement to all parties in interest in accordance with Bankruptcy Rule 2002.
11. The Debtors shall serve a printed copy of this Order upon all parties on the Master Service List within three (3) calendar days of the entry of this Order.

12. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: Houston, Texas
_____, 2009

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

NOTICE OF COMMENCEMENT

UNITED STATES BANKRUPTCY COURT, SOUTHERN DISTRICT OF TEXAS

In re:
Express Energy Services Operating, LP, et al.,
Debtors.

Chapter 11 Case No:
09-_____ () (Jointly Administered)

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**DATE, TIME, AND LOCATION OF
MEETING OF CREDITORS**

**PURSUANT TO BANKRUPTCY CODE
SECTION 341(a)**

_____, 2009 at __: __ .m. (Houston Time)
515 Rusk Street, Suite _____ (____ floor)
Houston, Texas 77002

DEADLINE TO FILE A PROOF OF CLAIM

None at this time. When the Court sets a claims deadline, you will be notified and provided a proof of claim form by mail.

DEADLINE TO FILE A COMPLAINT TO DETERMINE DISCHARGEABILITY OF CERTAIN DEBTS

Notice of deadline will be sent a later time

CREDITORS MAY NOT TAKE CERTAIN ACTIONS

In most instances, filing a bankruptcy case automatically stays collection and other actions against the debtors and the debtors' property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtors can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the bankruptcy code, you may be penalized. Common examples of prohibited actions by creditors are contacting the debtors to demand repayment, taking action against the debtors to collect money owed to creditors or to take property of the debtors, and starting or continuing collection actions, foreclosure actions, or repossessions. Consult a lawyer to determine your rights.

Filing of Chapter 11 Bankruptcy Case	A bankruptcy case under chapter 11 of the Bankruptcy Code (title 11, United States Code) has been filed in this Court by each of the debtors named above, and an order for relief has been entered. Chapter 11 allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the court. You may be sent a copy of the plan and disclosure statement telling you about the plan, and you might have an opportunity to vote on the plan. You will be sent a notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is appointed, the debtors will remain in possession of the debtors' property and may continue to operate their business.
Legal Advice	The staff of the bankruptcy clerk's office or the United States' Trustees office cannot give legal advice. Consult a lawyer to determine your rights in this case.
Meeting of Creditors	A meeting of creditors is scheduled for the date, time, and location listed above. <i>The debtors' representative must be present at the meeting to be questioned under oath by the trustee and by creditors.</i> Creditors are welcome to attend, but are not required to do so. The meeting may be continued and concluded at a later date without further notice. The court, after notice and a hearing, may order that the United States Trustee not convene the meeting if the debtor filed a plan for which the debtor solicited acceptances before filing the case.
Notice	You will not receive notice of all documents filed in these chapter 11 cases. On October 27, 2009, the Court entered its Order (I) Approving Procedures to Notify Creditors of the Commencement of the Debtors' Chapter 11 Cases and the Meeting of Creditors and (II) Establishing a Master Service List Applicable to the Debtors' Chapter 11 Cases (the " Notice Procedures Order "). The Notice Procedures Order describes the notice procedures that apply in these chapter 11 cases. All parties who desire to participate in these chapter 11 cases must follow the procedures set forth in the Notice Procedures Order. Parties can obtain a copy of the Notice Procedures Order and all other documents filed electronically with the Court in these cases, including lists of the Debtors' property and debts, by: (i) contacting the Clerk of the Court at 515 Rusk Street, Houston, Texas 77002; (ii) accessing the Court's website at www.txsb.uscourts.gov . Note that a PACER (http://www.pacer.psc.uscourts.gov) password and login are needed to access documents on the Court's website; (iii) accessing the Claims Agent website at www.expressenergyinfo.com ; or (iv) contacting the Debtors' counsel at: Weil, Gotshal & Manges, LLP, 700 Louisiana Street, Suite 1600, Houston, Texas 77002 (Attn: Alfredo R. Pérez and Christopher M. López).
Claims	Schedules of claims and other liabilities will be filed pursuant to Bankruptcy Rule 1007. Any creditor holding a scheduled claim that is not identified as disputed, contingent, or unliquidated as to amount may, but is not required to, file a proof of claim in these cases. Creditors whose claims are not scheduled or whose claims are scheduled as disputed, contingent, or unliquidated as to amount and who desire to participate in these cases or share in any distribution must file a proof of claim. A creditor who relies on any schedule of liabilities has the responsibility for determining that the claim is listed accurately. A form of proof of claim and notice of the deadline for filing such proof of claim will be sent to you later. A deadline for the last day to file proofs of claim has not yet been established.

Discharge of Debts	Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. <i>See</i> Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtors, except as provided in the plan. If you believe that a debt owed to you is not dischargeable under Bankruptcy Code § 1141(d)(6), you must start a lawsuit by filing a complaint in the bankruptcy clerk's office by the "Deadline to File a Complaint to Determine Dischargeability of Certain Debts" listed above. The bankruptcy clerk's office must receive the objection by the "Deadline to File a Complaint to Determine Dischargeability of Certain Debts" listed on the front side.	
Bankruptcy Clerk's Office	Any paper that you file in these bankruptcy cases should be filed at the bankruptcy clerk's office at the address listed below. You may inspect all papers filed, including the list of the debtor's property and debts and the list of the property claimed as exempt, at the bankruptcy clerk's office.	
Foreign Creditors	Consult a lawyer familiar with United States bankruptcy law if you have any questions regarding your rights in this case.	
<u>Address of the Clerk of the Bankruptcy Court</u> Clerk of the United States Bankruptcy Court, 515 Rusk Street Houston, Texas 77002	For the Court: _____ Clerk of the Bankruptcy Court Hours Open: 8:00 a.m. – 5:00 p.m. Monday through Friday	
Refer to the other side for Important Deadlines and Notices.		