

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In Re: Express Energy Services Operating, LP

Case No.: 09-38044

Debtor

Chapter: 11

**NOTICE AND ORDER REGARDING EXCHANGING OF EXHIBITS AND WITNESS LISTS IN ALL
CONTESTED MATTERS AND ADVERSARY PROCEEDINGS**

In order to avoid trial by ambush, the Court issues this Notice and Order Regarding Exchanging of Exhibits and Witness Lists in all Contested Matters and Adversary Proceedings.

Counsel for each party shall exchange exhibits at least 72 hours prior to the scheduled time of the hearing or trial. For example, if a hearing is scheduled for a Monday at 10:00 a.m., then counsel for each party must exchange exhibits by no later than 10:00 a.m. on the previous Friday. **Failure to timely provide exhibits to opposing counsel will be grounds for the Court to deny the introduction of all or any of the exhibits.**

Counsel for each party shall also exchange witness lists at least 72 hours prior to the scheduled time of the hearing or trial. **Failure to timely provide witness lists to opposing counsel will be grounds for the Court to deny testimony from any or all witnesses.**

If counsel intends to use hard copy exhibits at the hearing or trial, then counsel must deliver hard copy exhibits to opposing counsel; a disk will not suffice. Conversely, if counsel intends to use technology in the courtroom by putting the exhibits on a disk so that exhibits may be shown on the screens in the courtroom, then counsel must deliver a disk to opposing counsel; and this disk must contain the exhibits in the same order as they are contained on the disk to be used in the courtroom. **Failure to comply with these instructions will be grounds for the Court to deny the introduction of all or any of the exhibits.**

If counsel prefers to introduce hard copy exhibits, then all exhibits should be in a 3 ring notebook, with each exhibit tabbed and marked. All exhibits must be legible. An exhibit list must be included in the notebook; this list must briefly describe all exhibits. Each counsel must bring at least five exhibit booklets to the hearing: one for the court; one for the courtroom deputy; one for the witness box; one for opposing counsel; and one for counsel herself/himself. **Failure to bring to the courtroom the requisite number of exhibit booklets, with properly tabbed and marked exhibits, will be grounds for the Court to deny the introduction of all or any of the exhibits.**

If counsel has identified expert witnesses on the witness list, then counsel must ensure that the written reports of the expert witnesses are timely provided to opposing counsel, and are also included in the exhibit booklet or, if counsel is using a disk, in the disk containing all exhibits. **Failure to comply with these instructions will be grounds for the Court to deny the testimony of the expert witness(es).**

If a hearing is held on an emergency basis, then all of the above referenced procedures shall apply except that counsel must exchange all exhibits (in the same form that they will be used at the hearing) and witness lists not later than 24 hours prior to the time that the hearing is scheduled to begin. A hearing is only held on an emergency basis if the order setting the hearing expressly states that the hearing is an emergency hearing.

It is so ORDERED.

Signed and Entered on Docket: 5/10/11


JEFF BOHM
United States Bankruptcy Judge

United States Bankruptcy Court
Southern District of TexasIn re:
Express Energy Services Operating, LP
DebtorCase No. 09-38044-jb
Chapter 11**CERTIFICATE OF NOTICE**

District/off: 0541-4

User: admin
Form ID: exwitJBPage 1 of 2
Total Noticed: 44

Date Rcvd: May 10, 2011

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 12, 2011.

db +Express Energy Services Operating, LP, 9800 Richmond Ave, Suite 700, Houston, TX 77042-4685
 aty +David C Carlile, The Carlile Law Firm LLP, 400 S Alamo, Marshall, TX 75670-4260
 aty +Elizabeth Weller, Linebarger Heard et al, 2323 Bryan St, Ste 1720, Dallas, TX 75201-2603
 aty +Jimmie A Franklin, Franklin Law Firm PLLC, 4150 International Plaza, Ste 600,
 Fort Worth, TX 76109-4831
 aty +Joon P Hong, Richards Kibbe, One World Financial Center, New York, NY 10281-1003
 aty +Weil Gotshal and Manges LLP, 767 Fifth Ave, New York, NY 10153-0119
 cr +AFCO, 4501 College Blvd, Ste 320, Leawood, KS 66211-2328
 fa +Alvarez and Marsal North America LLC, 700 Louisiana St, Ste 900, Houston, TX 77002-2769
 cr +Baker Hughes Oilfield Operations, Inc., c/o Phil Snow, 2929 Allen Parkway, Suite 4100,
 Houston, TX 77019-7106
 cr +Brazos County, et al, c/o Michael Reed, P O Box 1269, Round Rock, TX 78680-1269
 cr +Chesapeake Operating, Inc., 10 Floor, 2 Leadership Square, 211 N. Robinson,
 Oklahoma City, OK 73102-7109
 cr +Credit Suisse, Cayman Islands Branch, c/o Charles R. Gibbs,
 Akin Gump Strauss Hauer & Feld LLP, 1700 Pacific Avenue, Suite 4100, Dallas, TX 75201-4675
 cr David Shetter, c/o Frankel & Frankel, L.L.P., 12700 Park Central Drive, Suite 1900,
 Dallas, TX 75251-1508
 cr David Shetter, c/o Don J. Knabeschuh, 5090 Richmond Ave., #472, Houston, TX 77056-7402
 cr Dolphin Petroleum, P.O. Box 90, Alice, TX 78333-0090, UNITED STATES
 cr +Ector Cad, 711 Navarro, Suite 300, San Antonio, TX 78205-1749
 cr ++FORD MOTOR CREDIT COMPANY, PO BOX 6275, DEARBORN MI 48121-6275
 (address filed with court: Ford Motor Credit Company LLC, Dept 55953, PO Box 55000,
 Detroit, MI 48255-0953)
 cr +First National Capital Corporation, c/o Keating Muething & Klekamp PLL,
 1 East Fourth St., Ste. 1400, Cincinnati, OH 45202-3708
 cr Fort Worth ISD, c/o Elizabeth Banda, Perdue Brandon Fielder et al, P O Box 13430,
 Arlington, TX 76094-0430
 cr +General Electric Capital Corporation, c/o Kevin Walters, Prisdha Govender,
 Chaffe McCall, L.L.P., 815 Walker Street, Suite 953, Houston, TX 77002-5735
 cr +Gray County c/o, Perdue Brandon Fielder Collins & Mott, PO Box 9132,
 Amarillo, TX 79105-9132
 cr +Gregg County, C/O John P. Dillman, Linebarger Goggan Blair & Sampson, LLP, P. O. Box 3064,
 Houston, TX 77253-3064
 cr Harris County et al, Linebarger Goggan Blair & Sampson LLP, c/o John P. Dillman,
 PO Box 3064, Houston, TX 77253-3064
 cr +Hydra-Dynamics, Inc., 19 Wrenfield Place, The Woodlands, TX 77384-4696, UNITED STATES
 cr IKON Financial Services, Bankruptcy Administration, 1738 Bass Road, P.O. Box 13708,
 Macon, GA 31208-3708
 cr +Iron Mountain Information Management, Inc., c/o Frank F. McGinn, Esq.,
 Bartlett Hackett Feinberg P.C., 155 Federal Street, 9th Floor, Boston, MA 02110-1610
 cr Jackson County, Linebarger Goggan Blair & Sampson, Attn: John P. Dillman, PO Box 3064,
 Houston, TX 77253-3064
 cr Johnson County, City of Cleburne, Cleburne ISD, Hi, c/o Elizabeth Banda,
 Perdue Brandon Fielder et al, P O Box 13430, Arlington, TX 76094-0430
 intp +Joon P Hong, Richards Kibbe & Orbe LLP, One World Financial Center, New York, NY 10281-1098
 cr Office of Unemployment Compensation Tax Services, Department of Labor & Industry,
 Commonwealth of Pennsylvania, 625 Cherry Street, Room 203, Reading, PA 19602-1184
 cr Sandford Oil Company, c/o Timothy A. York, Quilling Selander Cumiskey & Lownds,
 2001 Bryan Tower Suite 1800, Dallas, TX 75201
 cr +Southern Field Maintenance, 2004 S. Laurent, Victoria, TX 77901-9404
 cr +Stallion Oilfield Services Ltd., c/o Mark Schuck, The Schuck Law Firm, PLLC,
 4545 Mount Vernon Street, Houston, TX 77006-5815
 sp +Sullins and Johnston PC, 3200 Southwest Fwy, Ste 2200, Houston, TX 77027-7533
 cr Tarrant County, c/o John P. Dillman, PO BOX 3064, Houston, TX 77253-3064
 cr +Texas Comptroller of Public Accounts, John Stern, P.O. Box 12548, Austin, TX 78711-2548
 cr Texas Workforce Commission, Jason Starks, c/o Sherri K. Simpson, Paralegal, P.O. Box 12548,
 Austin, TX 78711-2548
 op +The Garden City Group, Inc., 105 Maxess Road, Melville, NY 11747-3848
 cr +Valerus Compression Services LP, C/O Eric M. English, King & Spalding LLP, 1100 Louisiana,
 Suite 4000, Houston, TX 77002-5213
 cr +Verizon, 404 Brock Drive, Bloomington, IL 61701-2654
 cr +Victoria County, c/o Diane W. Sanders, Linebarger Goggan Blair & Sampson, LLP,
 P.O. Box 17428, Austin, TX 78760-7428
 cr Wharton County, Linebarger Goggan Blair & Sampson LLP, c/o John P. Dillman,
 Post Office Box 3064, Houston, TX 77253-3064
 cr +Wise CAD, C/O John P. Dillman, Linebarger Goggan Blair & Sampson, LLP, P.O. Box 3064,
 Houston, TX 77253-3064
 cr +Wise County, C/O John P. Dillman, Linebarger Goggan Blair & Sampson, LLP, P.O. Box 3064,
 Houston, TX 77253-3064

District/off: 0541-4

User: admin
Form ID: exwitJB

Page 2 of 2
Total Noticed: 44

Date Rcvd: May 10, 2011

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center (continued)

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
db +E-mail/Text: estalbert@eeslp.com May 11 2011 01:43:22 Express Energy Services Operating, LP,
9800 Richmond Ave, Suite 700, Houston, TX 77042-4685

TOTAL: 1

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

- cr Chrysler Financial Services Americas L.L.C. f/k/a
- cr Darrell Brewer
- cr De Lage Landen Financial Services, Inc.
- cr Dolphin Petroleum
- cr EnCana Oil & gas (USA) Inc.
- cr FSP Phoenix Tower Limited Partnership
- intp Jack Winn
- cr Jeffery A Bell
- cr John Deere Construction & Forestry Company
- cr Mark B Wilson
- cr Merit Energy Company, L.L.C.
- cr National Oilwell Varco, LP
- cr Northwest ISD
- cr Orix Finance Corp.
- cr Penn Virginia MC Energy, LLC
- cr Penn Virginia MC Operating Company LLC
- cr Penn Virginia Oil and Gas Corporation
- cr Penn Virginia Oil and Gas, LP
- cr Sharyland ISD
- cr Siemens Financial Services, Inc.
- cr Smith International, Inc.
- cr South Texas College
- cr South Texas ISD
- cr Tome Green County Appraisal District
- cr Toyota Motor Credit Corporation
- cr Wanda E Bell

TOTALS: 26, * 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 12, 2011

Signature:

