

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ARSENAL ENERGY HOLDINGS LLC,

Debtor.¹

Chapter 11

Case No. 19-10226 (BLS)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FEBRUARY 13, 2019 AT 9:30 A.M. (ET)**

Location: UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801

UNCONTESTED MATTER GOING FORWARD

1. Confirmation of Pre-Packaged Plan of Reorganization of Arsenal Energy Holdings LLC [D.I. 6, 2/4/19]

Response/Objection Deadline: February 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal response from the United States Department of Justice
- B. Objection of the United States Trustee to (I) the Debtor's Motion for Entry of a Scheduling Order and (II) Approval of the Disclosure Statement and Confirmation of the Debtor's Prepackaged Plan [D.I. 24, 2/5/19]

Related Documents:

- C. Declaration of Allen Goetz, Chief Financial Officer, in Support of Chapter 11 Petition, First Day Pleadings and Retention Applications [D.I. 2, 2/4/19]
- D. Disclosure Statement for Pre-Packaged Plan of Reorganization of Arsenal Energy Holdings LLC [D.I. 7, 2/4/19]

¹ The last four digits of the Debtor's taxpayer identification number are 6279. The Debtor's address is 6031 Wallace Road Ext., Suite 300, Wexford, PA 15090.

² **Amended items appear in bold.**

- E. Declaration of James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Pre-Packaged Plan of Reorganization of Arsenal Energy Holdings LLC [D.I. 8, 2/4/18]
- F. Order (I) Scheduling Combined Hearing on Adequacy of Disclosure Statement and Confirmation of Pre-Packaged Plan; (II) Approving Procedures for Objecting to Disclosure Statement and Pre-Packaged Plan; (III) Approving Prepetition Solicitation Procedures and Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline; (IV) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (V) Conditionally (A) Directing the United States Trustee Not to Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing Schedules and Statements and Rule 2015.3 Reports; and (VI) Granting Related Relief [D.I. 30, 2/6/19]
- G. Memorandum of Law in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Pre-Packaged Plan of Reorganization, and Reply to Objection of the United States Trustee [D.I. 44, 2/11/19]
- H. Declaration of Allen Goetz in Support of the Memorandum of Law in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Pre-Packaged Plan of Reorganization [D.I. 45, 2/11/19]
- I. Declaration of Gideon Lapson in Support of the Memorandum of Law in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Pre-Packaged Plan of Reorganization [D.I. 46, 2/11/19]
- J. Notice of Filing of Proposed Confirmation Order [D.I. 47, 2/11/19]
- K. Chambers Energy Management, LP's Statement in Support of and Joinder to Debtor's Memorandum of Law in Support of an Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Prepetition Solicitation Procedures and (II) Confirming the Pre-Packaged Plan of Reorganization [D.I. 52, 2/11/19]
- L. **Statement of the Ad Hoc Committee of Subordinated Noteholders in Support of Approval of Debtors' Disclosure Statement for the Prepackaged Plan and Confirmation of the Prepackaged Plan [D.I. 53, 2/11/19]**

Status: Items A & B have been resolved. This matter is going forward on an uncontested basis.

[Signature page follows]

Dated: February 11, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Ashley E. Jacobs

Pauline K. Morgan (No. 3650)
Kara Hammond Coyle (No. 4410)
Ashley E. Jacobs (No. 5635)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253

-and-

SIMPSON THACHER & BARTLETT LLP

Michael H. Torkin
Kathrine A. McLendon
Nicholas E. Baker
425 Lexington Avenue
New York, New York 10017
T: (212) 455-2000
F: (212) 455-2502

Proposed Counsel to the Debtor and Debtor in Possession