

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

In re:	)	Chapter 11
	)	
Blackjewel, L.L.C., <i>et al.</i> ,	)	Case No. 19-30289
	)	
Debtors. <sup>1</sup>	)	(Joint Administration Requested)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER  
SCHEDULING AN EMERGENCY HEARING**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move this Court for an order pursuant to Rule 9013-1(f) of the Local Bankruptcy Rules of the U.S. Bankruptcy Court for the Southern District of West Virginia scheduling an emergency hearing on the Debtors' supplemental motion to approve a modified DIP financing proposal and other first-day motions.

1. As the Court is aware, the Debtors were left with no choice but to suspend the hearing on their request to approve debtor in possession financing and other first day relief because the funds necessary to fund the proposed loan were inappropriately frozen by United Bank. Following the events of that hearing the Debtors and their advisors have worked around the clock and have identified an alternative DIP structure that would provide senior secured funding from Mr. Hoops and likely incremental funding from an interested third-party funding source.

2. As set forth in the Debtors' supplemental DIP financing motion, the Debtors are at the precipice of converting these cases to chapter 7. If a hearing on the revised proposal cannot be held today these Debtors expect to have no choice but to convert these cases to chapter 7. If that occurs, untold amounts of value of the Debtors' assets and estates will be destroyed and more than

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Blackjewel, L.L.C. (0823); Blackjewel Holdings L.L.C. (4745); Revelation Energy Holdings, LLC (8795); Revelation Management Corporation (8908) and Revelation Energy, LLC (4605). The headquarters for each of the Debtors is located at 1051 Main Street, Milton, West Virginia 25541-1215.

1,700 people will be out of work. It is imperative that the revised financing proposal be heard today, if at all possible, if the Debtors are to continue as a going concern. Accordingly, the Debtors request that this court schedule an emergency hearing to consider the supplemental DIP financing motion, specifically the funding to be provided by Mr. Hoops, and other forms of first day relief.

WHEREFORE, the Debtors respectfully request that this court enter an order granting the relief requested and scheduling an emergency hearing today.

DATED: July 2, 2019

**SUPPLE LAW OFFICE, PLLC**

By: /s/ Joe M. Supple

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– and –

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*Proposed Co-Counsel to the Debtors and  
Debtors-in-Possession*

**EXHIBIT A**

Proposed Order

(Attached)

**FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

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Blackjewel, L.L.C., <i>et al.</i> ,	)	Case No. 19-bk-30289
	)	
Debtors. <sup>1</sup>	)	(Joint Administration Requested)

**ORDER SCHEDULING EMERGENCY HEARING ON THE DEBTORS’ SUPPLEMENTAL DIP FINANCING MOTION AND OTHER FIRST DAY RELIEF**

Upon the motion (the “Motion”) of the above-captioned Debtors<sup>2</sup> for entry of and order (i) scheduling an expedited hearing on the Debtors’ supplemental DIP financing motion and other first day relief filed contemporaneously herewith, and (ii) approving the form and manner of notice thereof; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this District is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Motion.

having been given under the circumstances; and this Court having found that good and sufficient cause exists for the relief granted by this Interim Order;

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED**

1. The Motion is GRANTED as set forth herein.
2. An expedited hearing on the \_\_\_\_\_ is scheduled for July 2, 2019 at \_:\_ .m.  
(prevailing Eastern Time)
3. Notice of this hearing shall be served as promptly as possible by the Debtors through their proposed claims and noticing agent.
4. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this order.
5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.