

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

In re:	Chapter 11
FURIE OPERATING ALASKA, LLC, <i>et al.</i> , ¹	Case No. 19-11781 (LSS)
Debtors.	(Jointly Administered)

**NOTICE OF BAR DATE FOR FILING OF PROOFS OF CLAIM,
INCLUDING SECTION 503(b)(9) CLAIMS, GENERAL BAR DATE IS
DECEMBER 16, 2019 AT 5:00 P.M. (PREVAILING EASTERN TIME)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE DEBTORS:

PLEASE TAKE NOTICE THAT ON August 9, 2019 (the “Petition Date”), the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). Bankruptcy Code sections 1107(a) and 1108 authorize the Debtors to hold and manage their assets as debtors in possession.

On November 5, 2019, the Bankruptcy Court entered an Order in the Debtors’ chapter 11 cases [Docket No. 258] (the “Bar Date Order”) establishing **Monday December 16, 2019 at 5:00 p.m. (prevailing Eastern Time)** (the “General Bar Date”) as the last date for any person or entity, including, without limitation, individuals, partnerships, limited liability companies, corporations, joint ventures, estates, and trusts, but excluding governmental units (each, a “Person” or “Entity” and collectively, “Persons” or “Entities”) to file a proof of claim, including claims asserted under Bankruptcy Code section 503(b)(9),² against any of the Debtors; and establishing **Wednesday February 5, 2020 at 5:00 p.m. (prevailing Eastern Time)** (the “Governmental Bar Date”) as the last date for any “governmental unit,” as that term is defined in section 101 (27) of the Bankruptcy Code, to file a proof of claim against any of the Debtors. Please note that the Governmental Bar Date applies only to governmental units; the General Bar Date applies to all holders of claims that are not governmental units.

The General Bar Date and the Governmental Bar Date and the procedures set forth below for filing proofs of claim apply to all claims against any of the Debtors that **arose before the Petition Date**, except that the General Bar Date and the Governmental Bar Date do not apply to

¹ The Debtors, together with the last four digits of each Debtor’s federal tax identification number, are: Furie Operating Alaska, LLC (8721); Cornucopia Oil & Gas Company, LLC (9914); and Corsair Oil & Gas LLC (8012). The location of the Debtors’ corporate headquarters and the service address for all Debtors is 188 W. Northern Lights Blvd. Suite 620, Anchorage, Alaska 99503.

² “503(b)(9) Claims” are claims on account of goods received by a Debtor within 20 days before the Petition Date, where such goods were sold to the Debtor in the ordinary course of such Debtor’s business, and entitled to administrative expense priority pursuant to section 503(b)(9) of the Bankruptcy Code. See 11 U.S.C. § 503(b)(9).

those claims listed in Section V below, which claims are specifically excluded from the Bar Date filing requirement.

I. WHAT IS A “CLAIM”?

As used herein, the term “Claim” means:

a. the right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; **or**

b. the right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

II. WHO MUST FILE A PROOF OF CLAIM?

You **MUST** file a proof of claim in order to share in distributions from the Debtors’ bankruptcy estates, or to vote on any plan of reorganization or liquidation in these chapter 11 cases, if you have a Claim that arose before the Petition Date, unless your Claim is one of the types of Claims described in Section V below. The following claimants must file a proof of claim:

a. Any Person or Entity whose claim is not listed on the Schedules and who desires to share in any distribution or vote on any plan of reorganization or liquidation in these Chapter 11 Cases;

b. Any Person or Entity whose claim is listed on the Schedules as “disputed,” “contingent,” or “unliquidated” and who desires to share in any distribution or vote on any plan of reorganization or liquidation in these Chapter 11 Cases;

c. Any Person or Entity that believes that its claim is improperly classified in the Schedules or listed in an incorrect amount in the Schedules and which desires to have its claim allowed in a classification or amount other than as set forth in the Schedules;

d. Any former or present full-time, part-time, salaried, or hourly employees must submit Proofs of Claim relating to any grievance (including, but not limited to, claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation) prior to the Claims Bar Date to the extent grounds for such grievances arose on or prior to the Petition Date;

e. Any Person or Entity whose claim is not listed on the Schedule of the particular Debtor against whom the Person or Entity asserts a claim; and

f. Any Person or Entity asserting entitlement to administrative expense status under section 503(b)(9) of the Bankruptcy Code, regardless of whether such claim is set forth in the Schedules.

III. WHAT TO FILE – PROOF OF CLAIM

The proof of claim form included in this Bar Date Notice Package is to be used in these chapter 11 cases. If you do not use the attached form, your proof of claim must be in substantial conformity with that form, or with Official Form 410, which can be downloaded from the Bankruptcy Court's website at: <http://www.uscourts.gov/forms/bankruptcy-forms/proof-claim-0>. Additional proof of claim forms also may be obtained free of charge by calling or emailing counsel to the Debtors (Matthew P. Ward, Phone: (302) 252-4320, e-mail: matthew.ward@wbd-us.com or Ericka F. Johnson, Phone: (302) 252-4320, e-mail: ericka.johnson@wbd-us.com). Proof of claim forms may also be obtained on the website of the claims and noticing agent, Prime Clerk, at <https://cases.primeclerk.com/furieoperatingalaska/EPOC-Index>.

All proofs of claim filed must be originals, with original signatures. All proof of claim forms must be signed by the claimant (or, if the claimant is not an individual, then by an authorized agent of the claimant). They must be written in English and be denominated in United States currency. You should attach to your completed proof of claim (1) any documents on which the Claim is based (if voluminous, a summary thereof must also be attached) or (2) an explanation as to why the documents are not available.

Any holder of more than one Claim must file a separate proof of claim with respect to each Claim.

Any holder of a Claim against more than one Debtor must file a separate proof of claim with respect to each such Debtor.

All holders of Claims must identify on their proof of claim the specific Debtor against which their Claim is asserted and the case number of that Debtor's bankruptcy case. The Debtors' bankruptcy cases and case numbers are: Furie Operating Alaska, LLC, Case No. 19-11781; Cornucopia Oil & Gas Company, LLC, Case No. 19-11782; Corsair Oil & Gas LLC Case No. 19-11783.

Any Proof of Claim asserting entitlement to administrative expense status under 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the Debtors in the 20 days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the 503(b)(9) claim is being asserted; (iii) attach documentation of any reclamation demand made to any Debtor under section 546(c) of the Bankruptcy Code (if applicable); and (iv) set forth whether any portion of the 503(b)(9) claim was satisfied by payments made by the Debtors pursuant to any order of the Bankruptcy Court authorizing the Debtors to pay prepetition claims.

IV. FILING PROCEDURES – PROOF OF CLAIM

Except as provided for herein, all proofs of claim must be delivered by first-class mail, overnight delivery, or hand delivery to the address below, or electronically using the interface available on the website of claims and noticing agent, Prime Clerk, at <https://cases.primeclerk.com/furieoperatingalaska/EPOC-Index> so as **TO BE RECEIVED** on or before the applicable Bar Date, **Monday December 16, 2019 at 5:00 p.m. (prevailing Eastern**

Time) (the General Bar Date) or, solely for claimants that are governmental units, **Wednesday February 5, 2020 at 5:00 pm (prevailing Eastern Time)** (the Governmental Bar Date):

Furie Operating Alaska, LLC Claims Processing Center
c/o Prime Clerk LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232
T: (844) 236-3904

Proofs of claim will be deemed timely filed only if received at the appropriate address above on or before the General Bar Date or, solely for claimants that are governmental units, the Governmental Bar Date. Proofs of claim may **not** be delivered by facsimile, telecopy, or electronic mail transmission, except electronically through the Prime Clerk interface at <https://cases.primeclerk.com/furieoperatingalaska/EPOC-Index>. If you would like to receive a confirmation of the date and time your proof of claim was received, please enclose an additional copy of the proof of claim, together with a self-addressed, stamped envelope, in the envelope in which you mail your original proof of claim form.

The fact that you have received this Notice does not necessarily mean that you have a Claim or that the Debtors or the Bankruptcy Court believe that you have a Claim against the Debtors.

V. PERSONS AND ENTITIES WHO MAY, BUT ARE NOT REQUIRED TO, FILE A PROOF OF CLAIM

Pending further order of the Bankruptcy Court, you do **not** need to file a proof of claim or interest on or prior to the General Bar Date or Governmental Bar Date, as applicable, if you are:

- a. Any Person or Entity which has already filed a proof of claim against the Debtors in a form that substantially conforms to the attached form, or to Official Form No. 410 and which meets the requirements of Section III hereof;
- b. Any Person or Entity (i) whose claim is listed on the Debtors' Schedules of Assets and Liabilities (the "Schedules") **and** (ii) whose claim is **not** listed as "disputed," "contingent," or "unliquidated," **and** (iii) that agrees with the classification and amount of its claim as set forth in the Schedules **and** (iv) that agrees that its claim is only against the particular Debtor specified in the Schedules;
- c. Any holder of a claim that heretofore has been allowed by an order of the Bankruptcy Court;
- d. Any Person or Entity whose claim has been paid in full by any of the Debtors, and does not assert any other claim against the Debtors;
- e. Any entity holding a claim for which a separate deadline is fixed by this Court; and
- f. Any Debtor holding a claim against another Debtor.

VI. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

If you have a Claim arising solely from, or as a consequence of, a Debtor's rejection of an unexpired lease or executory contract, you must file a proof of claim with respect to such Claim by the **latest** of (a) the General Bar Date, or, solely for claimants that are governmental units, the Governmental Bar Date; (b) twenty eight (28) days following the date of service of any notice or order of rejection of such unexpired lease or executory contract; or (c) the date set by any other order of the Bankruptcy Court.

VII. AMENDMENTS TO SCHEDULES

If the Debtors amend their Schedules subsequent to the date of the Bar Date Order to (a) add a Claim that was not previously listed on the Schedules; (b) designate a Claim as disputed, contingent, unliquidated, or undetermined that was not previously so designated; or (c) change the amount of a Claim reflected on the Schedules, or (d) change the classification or priority of a claim, the Debtors will give notice of any such amendment to the holders of Claims affected thereby. If you are the holder of an affected Claim and wish to file a proof of claim with respect thereto, you must do so by the **later** of (i) twenty eight (28) days from the date of such notice and (ii) the General Bar Date, or, solely for claimants that are governmental units, the Governmental Bar Date.

VIII. CONSEQUENCES OF FAILURE TO FILE A CLAIM BY THE APPLICABLE BAR DATE

ANY HOLDER OF A CLAIM AGAINST A DEBTOR WHO IS REQUIRED, BUT FAILS, TO FILE A PROOF OF CLAIM IN ACCORDANCE WITH THE BAR DATE ORDER ON OR BEFORE THE APPLICABLE BAR DATE, IN THE FORM AND MANNER DIRECTED BY THE BANKRUPTCY COURT MAY: (I) BE FOREVER BARRED, ESTOPPED, AND PERMANENTLY ENJOINED FROM ASSERTING SUCH CLAIM IN THESE CHAPTER 11 CASES AGAINST THE DEBTORS OR THEIR SUCCESSORS OR PROPERTY AND FROM FILING A PROOF OF CLAIM WITH RESPECT THERETO AND (II) NOT BE TREATED AS A CREDITOR (AS DEFINED IN BANKRUPTCY CODE SECTION 101(10)) WITH RESPECT TO SUCH CLAIM FOR PURPOSES OF VOTING OR DISTRIBUTION UNDER ANY PLAN OF REORGANIZATION OR LIQUIDATION FILED IN THESE CHAPTER 11 CASES; PROVIDED, HOWEVER, THAT A HOLDER OF A CLAIM SHALL BE ABLE TO VOTE UPON, AND RECEIVE DISTRIBUTIONS UNDER, ANY PLAN OF REORGANIZATION OR LIQUIDATION IN THESE CHAPTER 11 CASES TO THE EXTENT, AND IN SUCH AMOUNT, AS ANY UNDISPUTED, NONCONTINGENT, AND LIQUIDATED CLAIMS IDENTIFIED IN THE SCHEDULES ON BEHALF OF SUCH HOLDER.

IX. SCHEDULES AND ACCESS THERETO

You may be listed on the Schedules as the holder of a Claim against one or more of the Debtors. The Schedules have been filed in these chapter 11 cases. If you choose to rely on the Schedules in respect of your Claim and do not file a proof of claim, it is your responsibility to determine that your Claim is accurately listed in the Schedules.

Copies of the Schedules and Bar Date Order may be obtained free of charge upon written request to the Debtors' counsel at the addresses set forth on the last page of this Notice. Copies of the Schedules and the Bar Date Order may also be examined during regular business hours at the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801. Copies of the Schedules may also be downloaded free of charge from the Prime Clerk website: <https://cases.primeclerk.com/furieoperatingalaska>, and then by selecting the Tab for "Docket," followed by the tab for "Schedules and SOFA."

As stated above, if your Claim is (i) listed in the Schedules, (ii) if you agree with the nature, amount, and classification of your Claim as listed in the Schedules, (iii) if you do not dispute that your Claim is only against the Debtor specified in the Schedules, and (iv) if your claim is not described as "disputed," "contingent," or "unliquidated," you do not need to file a proof of claim (though you may still do so if you choose). However, if you are required to file a proof of claim, or if you decide to file one even if you are not required to do so, you **MUST** do so in a manner that your proof of claim is ***received*** by Prime Clerk on or before the General Bar Date, or, solely for governmental units, the Governmental Bar Date, in accordance with the procedures set forth in this Notice. Please be advised that the Debtors may make one or more amendments to the Schedules and alter the scheduled amount and/or classification of your claim, in which case you would be required to file a proof of claim if you disagree with such amendment. (See Section VII, above). A holder of a possible Claim against any of the Debtors may want to consult an attorney.

Contact information for Counsel for the Debtors in Possession:

WOMBLE BOND DICKINSON (US) LLP

Matthew P. Ward (DE Bar No. 4471)
Ericka F. Johnson (DE Bar No. 5024)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
Email: matthew.ward@wbd-us.com
ericka.johnson@wbd-us.com

MCDERMOTT WILL & EMERY LLP

Timothy W. Walsh (admitted *pro hac vice*)
Darren Azman (admitted *pro hac vice*)
Riley T. Orloff (admitted *pro hac vice*)
340 Madison Avenue
New York, New York 10173-1922
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
Email: twwalsh@mwe.com
dazman@mwe.com
rorloff@mwe.com