

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

In re:

FURIE OPERATING ALASKA, LLC, *et al.*,¹

Debtors.

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Chapter 11

Case No. 19-11781 (LSS)

Jointly Administered

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 12, 2019 AT 10:30 A.M. (EASTERN TIME)**²

ADJOURNED MATTERS:

1. Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Stalking Horse Bid Protections, (C) Scheduling an Auction For, and Hearing to Approve, the Sale of the Debtors' Assets, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Contract Assumption and Assignment Procedures and (F) Granting Related Relief and (II)(A) Approving the Sale of the Debtors Assets Free and Clear of Liens, Claims, Interests And Encumbrances, (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases and (C) Granting Related Relief [Docket No. 14, filed August 9, 2019]

Auction and Sale Objections Deadline: December 10, 2019 at 12:00 p.m. (extended to December 16, 2019 at 4:00 p.m. for Certain Royalty and Working Interest Owners and the Office of the United States Trustee)

Adequate Assurance Objection Deadline: December 10, 2019 at 12:00 p.m. (extended to December 16, 2019 at 4:00 p.m. for (i) Certain Royalty and Working Interest Owners; and (ii) Alaska Pipeline Company)

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 Please note that the hearing will be held before the Honorable Laurie Selber Silverstein in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801. Any person who wishes to appear telephonically must contact COURTCALL, LLC at 866-582-6878.

Objection/Responses/Replies:

- A. Notice to Prospective Bidders re: State of Alaska Bonding and Regulatory Requirements [Docket No. 112, filed September 11, 2019]
- B. Response and Reservation of Rights of Alaska Pipeline Company to Second Amended Notice of Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts [Docket No. 297, filed November 20, 2019]
- C. Limited Objection of Clear Creek Independent School District to Debtors' Motion for Entry of Orders (I)(A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Stalking Horse Bid Protections, (C) Scheduling an Auction For, and Hearing to Approve, the Sale of the Debtors' Assets, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Contract Assumption and Assignment Procedures and (F) Granting Related Relief and (II)(A) Approving the Sale of the Debtors Assets Free and Clear of Liens, Claims, Interests And Encumbrances, (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases and (C) Granting Related Relief [Docket No. 363, filed December 5, 2019]
- D. Melody Lenders' Preliminary Objection to Motion of the Debtors for Entry of Order Approving the Sale of Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances, and Related Relief [Docket No. 393, filed December 10, 2019]

Related Documents:

- A. Order (A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Procedures for Stalking Horse Bid Protections, (C) Scheduling an Auction for, and Hearing to Approve, the Sale of the Debtors' Assets, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Contract Assumption and Assignment Procedures and (F) Granting Related Relief [Docket No. 185, entered September 26, 2019]
- B. Notice of Sale, Bidding Procedures, Auction and Sale Hearing [Docket No. 194, filed September 30, 2019]
- C. Notice of Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts [Docket No. 206, filed October 9, 2019]
- D. Amended Notice of Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts [Docket No. 207, filed October 10, 2019]
- E. Notice of Filing of Proposed (i) Form Securities and Asset Purchase Agreements and (ii) Sale Order [Docket No. 237, filed October 28, 2019]
- F. Amended Notice of Sale, Bidding Procedures, Auction and Sale Hearing [Docket No. 252, filed November 1, 2019]

- G. Second Amended Notice of Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount [Docket No. 253, filed November 1, 2019]
- H. Notice of Extended Deadline to Submit Qualified Bids [Docket No. 339, filed December 2, 2019]
- I. Notice of Auction Results [Docket No. 377, filed December 6, 2019]

Status: This matter is adjourned to the hearing scheduled for December 20, 2019 at 10:00 a.m.

- 2. Joint Motion of Certain Royalty and Working Interest Owners for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [Docket No. 320, filed November 27, 2019]

Objection/Response Deadline: December 5, 2019 at 4:00 p.m. (extended to December 16, 2019 at 4:00 p.m. for (i) the Debtors and (ii) ECP)

Objection/Responses: None.

Related Documents: None.

Status: By agreement of the parties, this matter is adjourned to the hearing scheduled for December 20, 2019 at 10:00 a.m.

CONTESTED MATTERS GOING FORWARD:

- 3. Amended Motion of Bruce Webb and The Webb Family Trust (A) Seeking Authority and Standing to Pursue Derivative Claims, If Any, (B) Requesting an Extension of the Challenge Deadline, and (C) Requesting Conversion of Cases to Chapter 7, or, Alternatively, Appointment of Chapter 11 Trustee [Docket No. 283, filed November 18, 2019]

Objection/Response Deadline: December 5, 2019

Objection/Responses/Replies:

- A. Debtors' Omnibus Objection to Motions by Webb and the Certain Royalty and Working Interest Owners for Standing and Authority to Prosecute Claims on Behalf of the Debtors' Estates and for Related Relief [Docket No. 365, filed December 5, 2019]
- B. Declaration of Scott M. Pinsonnault in Support of Debtors' Objection to Standing Motions [Docket No. 366, filed December 5, 2019]
- C. Declaration of David W. Elder in Support of Debtors' Objection to Standing Motions [Docket No. 367, filed December 5, 2019]

- D. Declaration of Thomas P. Walsh in Support of Debtors' Objection to Standing Motions [Docket No. 368, filed December 5, 2019]
- E. Declaration of Arthur Wayne McBride in Support of Debtors' Objection to Standing Motions [Docket No. 369, filed December 5, 2019]
- F. Declaration of Jeffrey A. Brodsky in Support of Debtors' Objection to Standing Motions [Docket No. 370, filed December 5, 2019]
- G. Declaration of William L. Transier in Support of Debtors' Objection to Standing Motions [Docket No. 371, filed December 5, 2019]
- H. Appendix in Support of Debtors' Objection to Standing Motions [Docket No. 372, filed December 5, 2019]
- I. ECP's Omnibus Objection to the Webb Movants' and the RWIO Movants' Motions for Derivative Standing and to Extend the Challenge Deadline, and Joinder to the Debtors' Omnibus Objection and the Melody Lenders' Objection Regarding the Same [Docket No. 373, filed December 5, 2019]
- J. Melody Lenders' (I) Joinder to ECP's and the Debtors' Objections to the Webb and RWIO Motions and (II) Objection to the Webb and RWIO Motions [Docket No. 374, filed December 5, 2019]
- K. Declaration of Stephen P. Morgan in Support of the Melody Lenders' Joinder and Supplemental Objection [Docket No. 375, filed December 5, 2019]
- L. Reply in Support of Amended Motion of Bruce Webb and The Webb Family Trust (A) Seeking Authority and Standing to Pursue Derivative Claims, If Any, (B) Requesting an Extension of the Challenge Deadline, and (C) Requesting Conversion of Cases to Chapter 7, or, Alternatively, Appointment of Chapter 11 Trustee [Docket No. 392, filed December 9, 2019]

Related Documents:

- A. Order Approving Stipulation [Docket No. 292, filed November 18, 2019]

Status: This matter will go forward.

- 4. Motion of Certain Royalty and Working Interest Holders for Entry of an Order (I) Determining Nature of Certain Claims and (II) if Necessary, Granting Leave, Standing and Authority to Prosecute and, if Appropriate, Settle Certain Claims on Behalf of the Debtors' Estates [Docket No. 285, filed November 18, 2019]

Objection/Response Deadline: December 5, 2019

Objection/Responses/Replies:

- A. Debtors' Omnibus Objection to Motions by Webb and the Certain Royalty and Working Interest Owners for Standing and Authority to Prosecute Claims on Behalf of the Debtors' Estates and for Related Relief [Docket No. 365, filed December 5, 2019]
- B. Declaration of Scott M. Pinsonnault in Support of Debtors' Objection to Standing Motions [Docket No. 366, filed December 5, 2019]
- C. Declaration of David W. Elder in Support of Debtors' Objection to Standing Motions [Docket No. 367, filed December 5, 2019]
- D. Declaration of Thomas P. Walsh in Support of Debtors' Objection to Standing Motions [Docket No. 368, filed December 5, 2019]
- E. Declaration of Arthur Wayne McBride in Support of Debtors' Objection to Standing Motions [Docket No. 369, filed December 5, 2019]
- F. Declaration of Jeffrey A. Brodsky in Support of Debtors' Objection to Standing Motions [Docket No. 370, filed December 5, 2019]
- G. Declaration of William L. Transier in Support of Debtors' Objection to Standing Motions [Docket No. 371, filed December 5, 2019]
- H. Appendix in Support of Debtors' Objection to Standing Motions [Docket No. 372, filed December 5, 2019]
- I. ECP's Omnibus Objection to the Webb Movants' and the RWIO Movants' Motions for Derivative Standing and to Extend the Challenge Deadline, and Joinder to the Debtors' Omnibus Objection and the Melody Lenders' Objection Regarding the Same [Docket No. 373, filed December 5, 2019]
- J. Melody Lenders' (I) Joinder to ECP's and the Debtors' Objections to the Webb and RWIO Motions and (II) Objection to the Webb and RWIO Motions [Docket No. 374, filed December 5, 2019]
- K. Declaration of Stephen P. Morgan in Support of the Melody Lenders' Joinder and Supplemental Objection [Docket No. 375, filed December 5, 2019]
- L. Reply in Support of Motion of Certain Royalty and Working Interest Holders for Entry of an Order (I) Determining Nature of Certain Claims and (II) if Necessary, Granting Leave, Standing and Authority to Prosecute and, if Appropriate, Settle Certain Claims on Behalf of the Debtors' Estates [Docket No. 390, filed December 9, 2019]

Related Documents:

- A. Order Approving Stipulation [Docket No. 292, filed November 18, 2019]

Status: This matter will go forward.

Dated: December 10, 2019
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

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