

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
	§	
	§	Related Docket Nos.: 714, 715, 716, 720
	§	
	§	Hearing Date: May 8, 2020 at 11:30 a.m. (ET)
	§	Objection Deadline: May 5, 2020 at 4:00 p.m. (ET)

NOTICE OF HEARING ON DEBTORS' MOTION FOR (I) A SHORTENED NOTICE AND OBJECTION PERIOD; (II) AND EXPEDITED HEARING; AND (III) AND EXPEDITED RULING WITH RESPECT TO MOTION FOR AN ORDER (A) APPROVING DISCLOSURE STATEMENT; (B) ESTABLISHING VOTING RECORD DATE, VOTING DEADLINE, AND OTHER DATES; (C) APPROVING PROCEDURES FOR SOLICITATING, RECEIVING AND TABULATION VOTES ON PLAN AND FOR FILING OBJECTIONS TO PLAN; (D) APPROVING MANNER AND FORM OF NOTICE AND OTHER RELATED DOCUMENTS AND (E) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the “Debtors”) have filed (i) *The First Amended Joint Plan of Reorganization for the Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 714; filed April 19, 2020] (the “Amended Plan”), (ii) the *First Amended Disclosure Statement for the First Amended Joint Plan of Reorganization for the Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 715; filed April 19, 2020] (the “Amended Disclosure Statement”); and (iii) the *Debtors’ Motion for an Order (A) Approving Disclosure Statement; (B) Establishing Voting Record Date, Voting Deadline, and Other Dates; (C) Approving Procedures for Soliciting, Receiving and Tabulation Votes on Plan and for Filing Objections to Plan; (D) Approving Manner and Form of Notice and Other Related Documents and (E) Granting Related Relief* [Docket No. 716; filed April 20, 2020] (the “Disclosure Statement Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, on April 20, 2020, upon motion of the Debtors, the Bankruptcy Court entered an *Order Granting Debtors’ Motion For (I) A Shortened Notice And Objection Period, (II) An Expedited Hearing, And (III) An Expedited Ruling With Respect To Debtors Motion For Entry Of An Order (A) Approving Disclosure Statement; (B) Establishing Voting Record Date, Voting Deadline, And Other Dates; (C) Approving Procedures For Soliciting, Receiving, And Tabulating Votes On Plan And For Filing Objections To Plan; (D) Approving Manner And Forms Of Notice And Other Related Documents; And (E) Granting Related Relief* [Docket No. 720] (the “Order Shortening Notice”).

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.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order Shortening Notice, any responses or objections to the Disclosure Statement Motion must be (i) filed in writing with the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **May 5, 2020 at 4:00 p.m. (prevailing Eastern Time)**, and (ii) served upon the following notice parties:

- (a) Counsel for the Debtors: McDermott Will & Emery LLP, 340 Madison Avenue, New York, NY 10173 (Attn: Timothy W. Walsh and Riley T. Orloff; twwalsh@mwe.com, rorloff@mwe.com); and Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, DE 19801 (Attn: Matthew P. Ward and Ericka F. Johnson; matthew.ward@wbd-us.com, ericka.johnson@wbd-us.com);
- (b) Counsel to the Acquirer: David H. Bundy, 721 Depot Drive, Anchorage, AK 99501 (dhb@alaska.net);
- (b) Counsel to the DIP Agent and Prepetition Term Loan Administrative Agent: Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654 (Attn: Chad Husnick and Benjamin Rhode; chusnick@kirkland.com, benjamin.rhode@kirkland.com);
- (c) Counsel to the Melody Lenders and the Acquirer: Milbank LLP, 55 Hudson Yards, New York, NY 10001 (Attn: Abhilash M. Raval and Lauren C. Doyle; araval@milbank.com, ldoyle@milbank.com);
- (d) Counsel to the McGinty Road Lender: Stinson LLP, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402 (Attn: Adam M. Nathe; adam.nathe@stinson.com);
- (e) Counsel to the Prepetition Tax Credit Administrative Agent: Vinson & Elkins LLP, 2001 Ross Avenue, Suite 3900, Dallas, TX 75201 (Attn: William L. Wallander and Bradley R. Foxman; bwallander@velaw.com, bfoxman@velaw.com); and
- (f) The Office of the United States Trustee: 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE, 19801 (Attn: Juliet Sarkessian; Juliet.M.Sarkessian@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order Shortening Notice, a hearing with respect to the Disclosure Statement Motion will be held in the Bankruptcy Court on **May 8, 2020 at 11:30 a.m. (prevailing Eastern Time)** before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, 824 North Market Street, 6th Floor, Courtroom #2, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that copies of the Amended Plan, the Amended Disclosure Statement, the Disclosure Statement Motion and all pleadings and orders of the Court are publicly available, for a fee via PACER at: <http://www.deb.uscourts.gov>, or free of charge from Prime Clerk at <https://cases.primeclerk.com/furieoperatingalaska/>. Such documents and pleadings may also be obtained by: (a) calling the Debtors' restructuring hotline at (844) 648-5578 or (b) writing to Furie Operating Alaska Ballot Processing, c/o Prime Clerk, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, NY 10165, or via email at furieballots@primeclerk.com.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE DISCLOSURE STATEMENT MOTION IN ACCORDANCE WITH THIS NOTICE AND THE ORDER SHORTENING NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE DISCLOSURE STATEMENT MOTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.

Dated: April 20, 2020
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

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

-and-

McDERMOTT WILL & EMERY LLP

Timothy W. Walsh (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
rorloff@mwe.com

Counsel to the Debtors and Debtors in Possession