

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

In re:)	
)	Chapter 11
NEW GULF RESOURCES, LLC, <i>et al.</i>)	Case No. 15-12566 (BLS)
)	
Debtors. ¹)	Joint Administration Pending
)	

NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS

PLEASE TAKE NOTICE that, on December 17, 2015, New Gulf Resources, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the following pleadings (collectively, the “First Day Pleadings”) at a hearing on **December 18, 2015 at 10:00 a.m. (ET)** (the “Hearing”) before the Honorable Brendan Linehan Shannon, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801:

1. Motion of Debtors for an Order Directing Joint Administration of Chapter 11 Cases [D.I. 2, 12/17/15]
2. Debtors’ Application for an Order Authorizing the Appointment of Prime Clerk LLC as Claims and Noticing Agent [D.I. 3, 12/17/15]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: NGR Holding Company LLC (81-0781782), New Gulf Resources, LLC (27-5431365); NGR Finance Corp. (61-1735563) and NGR Texas, LLC (a disregarded entity for tax purposes). The Debtors’ mailing address is 10441 S. Regal Boulevard, Suite 210, Tulsa, Oklahoma 74133.

3. Debtors' Motion for Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service; (II) Deeming Utilities Adequately Assured of Future Performance; (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment; and (IV) Setting a Final Hearing [D.I. 4, 12/17/15]
4. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Existing Cash Management System and (B) Maintain Existing Accounts and Check Stock, (II) Granting an Extension of Time to Comply with Section 345(b) of the Bankruptcy Code, and (III) Authorizing the Debtors to Continue Intercompany Transactions and Granting Administrative Expense Status to Intercompany Claims [D.I. 5, 12/17/15]
5. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Pay Certain Pre-Petition Taxes and Regulatory Fees in the Ordinary Course of Business and (II) Authorizing Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [D.I. 6, 12/17/15]
6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay or Honor Prepetition and Postpetition (A) Obligations to Holders of Royalty Interests, Overriding Royalty Interests, and Working Interests and (B) Lease Operating Expenses; and (II) Granting Related Relief [D.I. 7, 12/17/15]
7. Debtors' Motion for Interim and Final Orders Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages, Salaries and Other Compensation, (II) Pay Prepetition Payroll Taxes and Benefits and Continue Benefit Programs in the Ordinary Course, and (III) Direct Banks to Honor Checks for Payment of Prepetition Employee Payment and Program Obligations [D.I. 8, 12/17/15]
8. Debtors' Motion for the Entry of Interim and Final Orders (I) Establishing Procedures for Transfers of Equity Securities; (II) Establishing Procedures for Claiming Worthless Stock Deduction; (III) Establishing an Effective Date for Notice and Sell-Down Procedures for Transfers of Claims Against the Debtors' Estates; and (IV) Granting Related Relief [D.I. 9, 12/17/15]
9. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 (A) (1) Authorizing the Debtors to Obtain Senior Secured Priming Superpriority Postpetition Financing, (2) Authorizing Use of Cash Collateral, (3) Granting Liens And Providing Superpriority Administrative Expense Status, (4) Granting Adequate Protection, and (5) Modifying the Automatic Stay; (B) Scheduling a Final Hearing; and (C) Granting Related Relief [D.I. 10, 12/17/15]

PLEASE TAKE FURTHER NOTICE that copies of all of the First Day Pleadings will be mailed to you subsequent to the Hearing, and are currently available on the website of the

Debtors' proposed claims and noticing agent, Prime Clerk LLC dedicated to these chapter 11 cases, <https://cases.primeclerk.com/newgulf>, or on the Court's website, www.deb.uscourts.gov. If you would like to receive copies of any of the First Day Pleadings prior to the Hearing, please contact Michelle Smith, Paralegal, at (302) 576-2603 or msmith@ycst.com. All parties wishing to participate in the Hearing telephonically must make arrangements with Court Call by telephone at (888) 882-6878 or on the internet at www.courtcall.com.

Dated: December 17, 2015
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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