

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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 In re: : Chapter 11
 :
 SUNDANCE ENERGY INC., *et al.*,¹ : Case No. 21-30882 (DRJ)
 :
 Debtors. : (Joint Administration Requested)
 :
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**DEBTORS’ AGENDA OF MATTERS SET FOR FIRST DAY HEARING
ON MARCH 10, 2021, AT 2:00 P.M. (PREVAILING CENTRAL TIME)**

I. EVIDENTIARY SUPPORT FOR FIRST DAY PLEADINGS

A. ***First Day Declaration.*** Declaration of Cathy L. Anderson in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 7]

Status: This Declaration will be relied upon as evidentiary support for the voluntary chapter 11 petitions and the first day pleadings listed below.

B. ***Coben Declaration.*** Declaration of Chad E. Coben in Support of Debtors’ Emergency Motion for Entry of Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 10]

Status: This Declaration will be relied upon as evidentiary support for the DIP Motion listed below.

C. ***Moshinsky Declaration.*** Declaration of Vladimir Moshinsky in Support of Debtors’ Emergency Motion for Entry of Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 11]

Status: This Declaration will be relied upon as evidentiary support for the DIP Motion listed below.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are Sundance Energy Inc. (9225), Sundance Energy, Inc. (3113), Armadillo E&P, Inc. (2735), and SEA Eagle Ford, LLC (8743). The Debtors’ address is 1050 17th Street, Suite 700, Denver, CO 80265.

II. FIRST DAY PLEADINGS

1. ***Joint Administration Motion.*** Debtors' Emergency Motion for Entry of an Order Directing Joint Administration of Related Chapter 11 Cases [Docket No. 2]

Status: This matter is going forward.

2. ***Complex Case Designation.*** Notice of Designation as Complex Case [Docket No. 3]

Status: This matter is going forward.

3. ***Prime Clerk Retention Application.*** Debtors' Emergency Application for Entry of an Order Authorizing the Employment and Retention of Prime Clerk LLC as Claims, Noticing, and Solicitation Agent [Docket No. 4]

Status: This matter is going forward.

4. ***Consolidated Creditor List Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors, (II) Waiving the Requirement to File a List of Equity Security Holders, and (III) Authorizing the Debtors to Redact Certain Personal Identification Information [Docket No. 5]

Status: This matter is going forward.

5. ***Solicitation Procedures Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Prepackaged Plan; (II) Fixing Deadline to Object to Disclosure Statement and Plan; (III) Approving (A) Solicitation Procedures, (B) Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline, and (C) Notices of Non-Voting Status and Opt Out Opportunity; (IV) Approving Procedures for Assumption of Contracts and Leases and Form and Manner of Cure Notice; (V) Conditionally Approving the Disclosure Statement; and (VI) Conditionally (A) Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors and (B) Waiving Requirement of Filing Statements of Financial Affairs and Schedules of Assets and Liabilities [Docket No. 8]

Status: This matter is going forward.

Related Documents:

- a. Joint Prepackaged Plan of Reorganization for Sundance Energy Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 21]
- b. Disclosure Statement for Joint Prepackaged Plan of Reorganization for Sundance Energy Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 22]

6. ***DIP Motion.*** Debtors' Emergency Motion for Entry of Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 9]

Status: This matter is going forward.

Related Documents:

- a. Declaration of Chad E. Coben in Support of Debtors' Emergency Motion for Entry of Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 10]
- b. Declaration of Vladimir Moshinsky in Support of Debtors' Emergency Motion for Entry of Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 11]
7. ***Employee Wages Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing (A) Payment of Prepetition Workforce Obligations and (B) Continuation of Workforce Programs on a Postpetition Basis, (II) Authorizing Payment of Payroll Related Taxes, (III) Confirming the Debtors' Authority to Transmit Payroll Deductions, and (IV) Authorizing Payment of Prepetition Claims Owing to the Administrator [Docket No. 12]

Status: This matter is going forward.

8. ***Utilities Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 13]

Status: This matter is going forward.

9. ***Cash Management Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Authorizing Continuation of Existing Deposit Practices, (III) Approving the Continuation of Intercompany Transactions, and (IV) Granting Administrative Expense Status to Certain Postpetition Intercompany Claims [Docket No. 14]

Status: This matter is going forward.

10. ***Insurance Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing Debtors to (I) Pay their Prepetition Insurance Obligations, (II) Pay their Prepetition Bonding Obligations, (III) Maintain their Postpetition Insurance Coverage, (IV) Maintain their Surety Bonds, and (V) Maintain Postpetition Financing of Insurance Premiums [Docket No. 15]

Status: This matter is going forward.

11. ***Taxes Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing Payment of Prepetition Taxes and Fees [Docket No. 16]

Status: This matter is going forward.

12. ***Royalty Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing Payment of (A) Royalty Payments, (B) Working Interest Disbursements, and (C) Lease Obligations [Docket No. 17]

Status: This matter is going forward.

13. ***All Trade Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing the Payment of Prepetition Trade Claims of Certain Creditors in the Ordinary Course of Business [Docket No. 18]

Status: This matter is going forward.

14. ***Equity Trading Motion.*** Debtors' Emergency Motion for Entry of an Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of, or Worthlessness Deductions with Respect to, Stock of the Debtors [Docket No. 19]

Status: This matter is going forward.

15. ***Hedging Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into and Perform Under Postpetition Hedge Agreements, (II) Granting Adequate Protection Liens and Adequate Protection Claims, and (III) Modifying the Automatic Stay [Docket No. 20]

Status: This matter is going forward.

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Signed: March 10, 2021
Houston, Texas

Respectfully Submitted,

/s/ Timothy A. ("Tad") Davidson II

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Proposed Counsel for the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

I certify that on March 10, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II