

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

In re:

BANGO OIL LLC,¹

Reorganized Debtor.

)
) Chapter 11
)
) Case No. 24-90508 (CML)
)
)
)
)
) **Re: Docket No. 5**

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO
THE REORGANIZED DEBTOR’S AND VERTEX GUC TRUST’S JOINT MOTION
FOR AN ORDER (A) APPROVING OMNIBUS CLAIMS OBJECTION PROCEDURES;
(B) WAIVING THE REQUIREMENT OF BANKRUPTCY RULE 3007(e)(6); AND (C)
GRANTING RELATED RELIEF**

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas* (the “Complex Rules”), the undersigned counsel for the above-captioned reorganized debtor (the “Reorganized Debtor”) and U.S. Bank Trust Company, National Association, solely in its capacity as the trustee (the “GUC Trustee”) of the Vertex GUC Trust (the “GUC Trust”), certify as follows:

1. On April 7, 2025, the Reorganized Debtor and GUC Trust filed the *Reorganized Debtor’s and Vertex GUC Trust’s Joint Motion for an Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief* [Docket No. 5] (the “Omnibus Claims Objection Procedures Motion”), seeking entry of a proposed final order in the form attached hereto (the “Proposed Order”).

¹ The Reorganized Debtor’s service address for purposes of this chapter 11 case is: 9107 West Russell Road, Suite 100, Las Vegas, Nevada 89148. The Reorganized Debtor’s chapter 11 case was previously jointly administered under the chapter 11 case of Vertex Energy, Inc., Case No. 24-90507 (CML).



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2. The deadline to file objections and responses to the Omnibus Claims Objection Procedures Motion was April 28, 2025.

3. Pursuant to paragraph 44 of the Complex Rules, the undersigned counsel represent to the Court that the Reorganized Debtor and the GUC Trustee are unaware of any objection to the Omnibus Claims Objection Procedures Motion, and that counsel have reviewed the Court's docket, and that no objection or response appears thereon.

4. The Reorganized Debtor and GUC Trust therefore request that the Court enter the Proposed Order.

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Houston, Texas
April 29, 2025

/s/ Jason G. Cohen

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Counsel for the Vertex GUC Trust

Certificate of Service

I certify that on April 29, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason G. Cohen

Jason G. Cohen

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

In re:

BANGO OIL LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 24-90508 (CML)

**ORDER (A) APPROVING OMNIBUS CLAIMS
OBJECTION PROCEDURES; (B) WAIVING THE REQUIREMENT OF
BANKRUPTCY RULE 3007(e)(6); AND (C) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)² of the Reorganized Debtor and the GUC Trust for entry of an order (this “**Order**”) (a) approving the omnibus claims objection procedures set forth herein and attached hereto as Annex 1 (the “**Objection Procedures**”), (b) waiving the requirement in Bankruptcy Rule 3007(e)(6) that Omnibus Objections contain objections to no more than 100 claims, and (c) granting related relief; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion and opportunity for a hearing on the Motion was appropriate under the circumstances and that no other further notice need be provided; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or

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² Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Motion.

overruled; and this Court having held a hearing on the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; it appearing that the relief requested in the Motion is in the best interest of the estates and creditors; and upon all of the proceedings before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Reorganized Debtor and the GUC Trust, as applicable, are authorized, but not directed, pursuant to sections 502(a) and 105(a) of the Bankruptcy Code, to file Omnibus Objections that include objections to Claims on any basis provided for in Bankruptcy Rule 3007(d) and/or the Additional Grounds.

2. The Reorganized Debtor and the GUC Trust, as applicable, may object to more than 100 Claims in a single Omnibus Objection on any of the bases set forth in Bankruptcy Rule 3007(d) and/or the Additional Grounds.

3. The Objection Procedures attached as Annex 1 to this Order are hereby approved, and the Reorganized Debtor and the GUC Trust, as applicable, are authorized to file and prosecute Omnibus Objections in accordance with the Objection Procedures and the other procedural safeguards set forth in Bankruptcy Rule 3007(e) (with the exception of Bankruptcy Rule 3007(e)(6)) and Bankruptcy Local Rule 3007-1).

4. Each Omnibus Objection will separately identify (i) the basis or bases for objection and (ii) each Claim subject to objection on the Applicable Grounds.

5. The form of Objection Notice, attached hereto as Annex 2, is hereby approved.

6. Nothing in this Order affects the Reorganized Debtor's or the GUC Trust's, as applicable, authority to pay Claims to the extent authorized by a separate order of this Court.

7. Nothing in this Order shall obligate the Reorganized Debtor or the GUC Trust to settle or pursue settlement of any particular Claim. Settlements of Claims may be negotiated and compromised by the Reorganized Debtor or the GUC Trust, as applicable, in their sole discretion, in accordance with the terms of the Plan and the Trust Agreement.

8. Each Omnibus Objection shall be filed with this Court and served via first-class mail on each affected claimant.

9. For the avoidance of doubt, the Reorganized Debtor and the GUC Trust, as applicable, may include objections to scheduled Claims in Omnibus Objections.

10. Nothing in this Order, the Motion, or the Objection Procedures shall be deemed: (a) an admission of the amount, basis, priority or validity of any Claim; (b) an impairment or waiver of the rights of the Reorganized Debtor, the GUC Trust, or any other party in interest, to dispute any Claim on any grounds or to assert counterclaims, rights of offset or recoupment or other defenses to any Claim or to seek to estimate any Claim; (c) a promise or requirement to pay any Claim; (d) a waiver of the rights of the Reorganized Debtor, the GUC Trust, or any other party in interest, under the Bankruptcy Code or other applicable law; or (e) prejudicial to the Reorganized Debtor's or the GUC Trust's rights to object to any Claim on an individual basis.

11. Notice of the Motion is adequate under Bankruptcy Rule 6004(a).

12. Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

13. The Reorganized Debtor and GUC Trust, as applicable, are authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.

14. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025
Houston, Texas

HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

Annex 1

Objection Procedures

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

In re:

BANGO OIL LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 24-90508 (CML)

PROCEDURES FOR FILING AND RESOLVING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), Bango Oil LLC, as reorganized debtor in the above captioned chapter 11 case (the “**Reorganized Debtor**”), and the Vertex GUC Trust (the “**GUC Trust**”)² may file omnibus objections (each, an “**Omnibus Objection**”) to Claims on the grounds that such Claims, in part or in whole:

- (a) were paid prepetition or paid postpetition pursuant to an order entered by the Court, or are satisfied by payment in full or in part on account of such claim from a party that is not a Debtor;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Debtors are not liable, including but not limited to Rejection Damages Claims, that exceed the maximum allowable amount of such Claims under 11 U.S.C. § 502(b)(6);
- (d) are incorrectly or improperly classified, *provided that*, the Omnibus Objection states the reason for the reclassification;

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in *Reorganized Debtors’ and Vertex GUC Trust’s Joint Motion for an Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief*. Docket No. [●].

- (e) have been withdrawn by informal writing (including email, text, or similar such means) between (i) the Reorganized Debtor or the GUC Trust and (ii) the claimant, but have not been withdrawn via any filing on the docket, *provided that* a copy of such informal writing be filed concurrently with the Omnibus Objection;³
- (f) are filed against non-Debtors, the incorrect Debtor, or multiple Debtors;
- (g) are disallowed or subordinated to all Claims or interests senior to or equal to the asserted Claim or interest arising out of the purchase or sale of a security of a Debtor or affiliate thereof pursuant to section 510(b) of the Bankruptcy Code;
- (h) fail to specify the Debtor(s) against whom the Claim is asserted;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan;
- (j) are inconsistent with the Debtors' books and records; or
- (k) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation.

2. Form of Omnibus Objection. Omnibus Objections filed by the Reorganized Debtor or the GUC Trust, as applicable, will be numbered consecutively and set forth in the title of the Omnibus Objection the basis or bases for the objection (*i.e.*, late-filed, amended and superseded, overstated, etc.).

3. Supporting Documentation. To the extent appropriate, Omnibus Objections will include a supporting declaration providing the factual basis for the Reorganized Debtor's or the GUC Trust's, as applicable, objection to the Claims in accordance with Bankruptcy Local Rule 3007-1(a). Such supporting declaration may be from an individual with personal knowledge of the Debtors' books and records and the manner in which they are maintained, which states that

³ For the avoidance of doubt, this Additional Ground shall not prevent the Reorganized Debtor or the GUC Trust, as applicable, from reconciling and resolving claims informally with the applicable claimant without further Order of this Court.

the declarant (or persons under the declarant's direction) has reviewed the applicable Claims included therein and supporting information and documentation provided therewith, made reasonable efforts to research the Claims on the Debtors' books and records, and determined that the books and records do not reflect the debt or the amount of debt that is alleged in the Claims.

4. Claims Exhibits. The proposed order for each Omnibus Objection will attach an exhibit listing the Claims that are subject to the Omnibus Objection. Each exhibit will include only the Claims for which there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each applicable exhibit. By including a Claim on one exhibit, the Reorganized Debtor and the GUC Trust will not waive their respective rights to object to the Claim on an additional basis or bases. The exhibits will include, without limitation, the following information, alphabetized by claimant:

- (a) the Claims that are included in the Omnibus Objection and the Proof of Claim numbers assigned to them on the Claims Register;
- (b) the asserted amount of the Claim;
- (c) the grounds for the objection; and
- (d) other relevant information, as applicable, including, but not limited to, (i) the particular basis to disallow, reduce, or modify each Claim, (ii) the proposed or reduced Claim amount the Reorganized Debtor or the GUC Trust seeks to fix and allow for any Claim, or (iii) the surviving Claims of affected claimants.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form of Annex 2 to the Court's Order approving these procedures (the "**Objection Notice**"), which will:

- (a) describe the basic nature of the Omnibus Objection;
- (b) inform creditors that their rights may be affected by the Omnibus Objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the Omnibus Objection, including all relevant dates and deadlines;

- (d) include an exhibit listing the names of all creditors that are subject to the Omnibus Objection, along with a reference to the particular exhibits of the Omnibus Objection on which their Claims are listed;
- (e) identify the Hearing (as defined below) date, if applicable; and
- (f) describe how copies of any Proof of Claim, the Omnibus Objection and other pleadings filed in the Debtors' chapter 11 cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice, proposed form of order and any relevant supporting declaration or affidavit) will be mailed to each creditor, or, if available, its attorney of record that is subject to the Omnibus Objection.

7. Omnibus Claims Objection Hearings. Each Omnibus Objection may be set for a hearing no less than 30 days after service of the Omnibus Objection (each, a "**Hearing**"), unless the Court orders otherwise. In the Reorganized Debtor's or the GUC Trust's, as applicable, discretion, each Omnibus Objection may be filed either (i) with a Hearing date already scheduled in coordination with the Court or (ii) filed without a Hearing date with the intent of scheduling a Hearing date in the event one or more Responses are filed. Hearings will be conducted according to Bankruptcy Local Rule 3007-1(d) such that, unless otherwise ordered by the Court or by consent of the parties, the initial Hearing will be non-evidentiary and used as a scheduling conference. In the sole discretion of the Reorganized Debtor or the GUC Trust, as applicable, after notice to the affected claimant, the Reorganized Debtor or the GUC Trust, as applicable, may (without further order of the Court) adjourn a Hearing on an Omnibus Objection to a subsequent hearing date by filing a notice or statement on the docket.

8. Entry of an Order Without a Hearing. For Claims subject to an Omnibus Objection for which no Response is filed and no appearance is made at a scheduled Hearing (if

any), or a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the scheduled Hearing (if any), the Reorganized Debtor or the GUC Trust, as applicable, may request at the scheduled Hearing, if any, that the Court enter an order granting the Omnibus Objection with respect to such Claims. Furthermore, if no Hearing has been scheduled, the Reorganized Debtor or the GUC Trust, as applicable, may seek entry of an order granting the Omnibus Objection without further notice to the claimant or a Hearing with respect to any Claim for which a Response was not filed in accordance with these procedures or for which a Response was consensually resolved with the claimant. Contested Claims for which a Response is filed but not resolved before the Hearing may be heard at the Hearing or adjourned to a subsequent hearing date at the sole discretion of the Reorganized Debtor or the GUC Trust, as applicable. If a subsequent Hearing is necessary, the Reorganized Debtor or the GUC Trust, as applicable, shall file with the Court and serve on the affected claimant(s) a notice of the subsequent Hearing (the date of which shall be determined in consultation with the affected claimant(s) or announced on the record). Notwithstanding the foregoing, nothing in these procedures shall prejudice the right of the Reorganized Debtor or the GUC Trust, as applicable, to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein pursuant to Section “Q” of the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and any Response thereto will constitute a separate contested matter under Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to each affected Claim. The Reorganized Debtor or the GUC Trust, as applicable, may, in its discretion and in accordance with other orders of the Court and the provisions of the Bankruptcy Code and Bankruptcy Rules,

settle the amount and validity of any contested Claims with the affected creditor without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to (i) file a Response in accordance with these procedures and (ii) appear at any scheduled Hearing regarding its Claim. If a claimant whose Claim is subject to an Omnibus Objection does not file a Response in compliance with these procedures or fails to appear at any Hearing on its claim, the Court may, in its discretion, grant the Omnibus Objection with respect to the Claim without further notice to the claimant.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the case number, and the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) assigned to the Claim(s) on the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to the Claim(s), including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection; and
- (c) contact information for the responding party, including:
 - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative on whom the Reorganized Debtor or the GUC Trust, as applicable, should serve its reply to the Response, if any; and
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

12. Filing the Response. A Response must be filed with the Court and served electronically using the Court's electronic filing system so that it is *actually received* not later than

4:00 p.m. (Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection was served (the “**Response Deadline**”) unless otherwise ordered by the Court.

13. Failure to Respond. A Response that is not filed timely and served in accordance with these procedures may not be considered by the Court at the Hearing. **Unless a claimant reaches an agreement with the Reorganized Debtor or the GUC Trust, as applicable, to resolve the Omnibus Objection to its Claim, the failure to timely file and serve a Response or to appear at the Hearing (if any), may result in the Court granting the Omnibus Objection without further notice or hearing to the claimant.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

14. Reply to a Response. The Reorganized Debtor or the GUC Trust, as applicable, shall be permitted to file a reply to any Response before the Hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Court’s Order approving them or any other pleadings filed in the Debtors’ chapter 11 cases are available at no cost at <https://www.veritaglobal.net/vertex>. Claimants may also obtain copies of any of the pleadings filed in these chapter 11 cases for a fee at the Court’s website at <http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court’s Public Access to Court Electronic Records (“**PACER**”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

16. Reservation of Rights. Nothing in these Objection Procedures, the Omnibus Objection, or the Objection Notice is intended or will be deemed to be: (a) an admission of the amount, basis, priority or validity of any Claim; (b) an impairment or waiver of the right of the Reorganized Debtor, the GUC Trust, or any other party in interest, to dispute any Claim on any

grounds or to assert counterclaims, rights of offset or recoupment or other defenses to any Claim or to seek to estimate any Claim; (c) a promise or requirement to pay any Claim; (d) a waiver of the rights of the Reorganized Debtor, the GUC Trust, or any other party in interest, under the Bankruptcy Code or other applicable law; or (e) prejudicial to the Reorganized Debtor's or the GUC Trust's right to object to any Claim on an individual basis.

Annex 2

Objection Notice

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

In re:

BANGO OIL LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 24-90508 (CML)

**NOTICE OF [REORGANIZED DEBTOR'S][VERTEX GUC TRUST'S] [NUMBER]
OMNIBUS OBJECTION TO CERTAIN CLAIMS
([LATE FILED, AMENDED/SUPERSEDED, OVERSTATED, ETC.] CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW OR MODIFY THE CLAIM THAT YOU FILED IN THESE BANKRUPTCY CASES. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT A HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

[A HEARING HAS BEEN SET ON THIS OBJECTION ON [DATE] AT [TIME] IN COURTROOM 401, 515 RUSK, HOUSTON, TEXAS 77002. YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AUDIO/VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE THROUGH THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING APPLICATION. TO CONNECT, YOU SHOULD ENTER THE MEETING CODE "JUDGE LOPEZ" IN THE GOTOMEETING APP OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE ON THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING. HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF THE HEARING. TO MAKE YOUR ELECTRONIC APPEARANCE, GO TO THE SOUTHERN DISTRICT OF TEXAS WEBSITE AND SELECT "BANKRUPTCY COURT" FROM THE TOP MENU. SELECT "JUDGES"

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PROCEDURES,” THEN “VIEW HOME PAGE” FOR JUDGE LOPEZ. UNDER “ELECTRONIC APPEARANCE (COMPLEX CASES)” SELECT “CLICK HERE TO SUBMIT ELECTRONIC APPEARANCE”. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK “SUBMIT” TO COMPLETE YOUR APPEARANCE.^{2]}

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE OR MODIFY CERTAIN PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULES [●] THROUGH [●] TO THE ORDER FILED WITH THIS OBJECTION.

Important Information Regarding the Objection

Omnibus Objection. [Bango Oil LLC, as reorganized debtor in the above captioned chapter 11 case (the “**Reorganized Debtor**”)] [the Vertex GUC Trust (the “**GUC Trust**”)] hereby files the attached objection (the “**Omnibus Objection**”), to the claims listed on the exhibit(s) attached to the proposed order attached to the Omnibus Objection.

Grounds for the Objection. By the Omnibus Objection, the [Reorganized Debtor][GUC Trust] is seeking to [disallow/expunge/reclassify/reduce/subordinate] your claim(s) listed in the [attached schedule] on the grounds that your claim(s) [is/are] []. All of the claim(s) subject to the Omnibus Objection may also be found on the schedules attached to the form of order accompanying the Omnibus Objection, a copy of which is provided with this notice.

Objection Procedures. On [●], 2025, the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) entered an order approving procedures for filing and resolving objections to claims asserted against the Debtors in these chapter 11 cases (the “**Objection Procedures**”). A copy of the Objection Procedures is included with this notice. **Please review the Objection Procedures carefully to ensure your response to the Omnibus Objection, if any, is timely and correctly filed and served.**

Resolving the Omnibus Objection

Parties Required to File a Response. If you disagree with the Omnibus Objection as it relates to your claim, you must file a response (a “**Response**”) with the Court by 4:00 p.m. (Central Time) on [●]. Please review the Objection Procedures carefully to ensure your response to the Omnibus Objection, if any, is filed timely and correctly.

Contents of Response. Each Response must contain, at a minimum, the following:

- (a) caption stating the name of the Court, the names of the Reorganized Debtor, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims register;

² Information regarding appearance at a hearing will only be included to the extent the applicable omnibus objection is filed with a hearing date already scheduled.

- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to your claim, including the factual and legal bases upon which you will rely in opposing the Omnibus Objection; and
- (c) either (i) the name, address, telephone number, and email address of the party responding on your behalf or the name, address, telephone number, and email address of your attorney or designated representative to whom the attorneys for the [Reorganized Debtor][GUC Trust] should serve a reply to the Response, if any; or (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on your behalf.

Notice and Service. Your Response must be filed with the Court and served electronically using the Court's electronic filing system so as to be **actually received** by 4:00 p.m. (Central Time) on [●] (the "**Response Deadline**").

Failure to Respond. A Response that is not filed and served in accordance with the Objection Procedures may not be considered by the Court at any hearing that may be scheduled with respect to your claim. **Unless you reach an agreement with the [Reorganized Debtor][GUC Trust] to resolve its objection to your claim, the failure to timely file and serve a Response pursuant to the Objection Procedures and to appear at the Hearing, if one is scheduled, may result in the Court granting the Omnibus Objection as to your claim without further notice or hearing.** The [Reorganized Debtor][GUC Trust] will serve a copy of any order the Court may enter granting the Omnibus Objection on each affected creditor.

Hearing.³ If a Response is timely filed, the Court will hold an initial hearing on the Omnibus Objection to your claim. The [Reorganized Debtor][GUC Trust] will serve a notice on you with the date and time of the initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. Failure to appear at the initial hearing may result in the summary disposition of the Objection.

[OR]

A hearing (the "**Hearing**") on the Omnibus Objection will be held on [Date], at [Time] Central Time, before the Honorable Christopher M. Lopez, United States Bankruptcy Judge, in Courtroom 401, 515 Rusk, Houston, Texas 77002. You may participate in the Hearing via audio/video connection with the instructions included at the top of this Notice. The Hearing may be adjourned to a later date in the [Reorganized Debtor][GUC Trust]'s sole discretion. Unless you have resolved your claim with the [Reorganized Debtor][GUC Trust], you must attend the Hearing if you disagree with the Omnibus Objection and have filed a Response.

Discovery. If the [Reorganized Debtor][GUC Trust] determines that discovery is necessary to adjudicate your claim, the [Reorganized Debtor][GUC Trust] will serve a notice on you and your counsel of record (if any) that a scheduling order regarding your claim will be

³ This section will be altered to reflect whether a Hearing has been scheduled in advance of the filing of the applicable Omnibus Objection.

requested at the Hearing. Such notice may be incorporated into the agenda for the hearing, or may be provided by separate notice.

Additional Information

Questions or Information. Copies of the Objection Procedures, the Omnibus Objection, or any other pleadings filed in the Debtors' chapter 11 cases are available at no cost at <https://www.veritaglobal.net/vertex>. You may also obtain copies of any of the pleadings filed in these chapter 11 cases for a fee at the Court's website at <http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Please do not contact the Court to discuss the merits of any claim or any Omnibus Objection.

Reservation of Rights

NOTHING IN THE OMNIBUS OBJECTION OR THIS OBJECTION NOTICE IS INTENDED OR WILL BE DEEMED TO BE (A) AN ADMISSION OF THE AMOUNT, BASIS, PRIORITY OR VALIDITY OF ANY CLAIM; (B) AN IMPAIRMENT OR WAIVER OF THE [REORGANIZED DEBTOR'S][GUC TRUST'S] RIGHTS TO DISPUTE ANY CLAIM ON ANY GROUNDS OR TO ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT OR OTHER DEFENSES TO ANY CLAIM OR TO SEEK TO ESTIMATE ANY CLAIM; (C) A PROMISE OR REQUIREMENT TO PAY ANY CLAIM; (D) A WAIVER OF ANY RIGHT OF THE [REORGANIZED DEBTOR][GUC TRUST] UNDER THE BANKRUPTCY CODE OR OTHER APPLICABLE LAW; OR (E) PREJUDICIAL TO THE REORGANIZED DEBTOR'S OR THE GUC TRUST'S RIGHTS TO OBJECT TO ANY CLAIM ON AN INDIVIDUAL BASIS.

Dated: [●]

[COUNSEL INFO]