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

In re:	Chapter 11
	Chapter 11

BANGO OIL LLC,1 Case No. 24-90508 (CML)

(Jointly Administered)

Reorganized Debtor.

## VERTEX GUC TRUST'S MOTION FOR AN ORDER EXTENDING DEADLINE TO OBJECT TO GENERAL UNSECURED CLAIMS

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST **FILE YOUR** RESPONSE **ELECTRONICALLY** HTTPS://ECF.TXSB.USCOURTS.GOV/ WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

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"), by and through its undersigned counsel, respectfully represents as follows in support of the GUC Trust's motion to extend by 180 days the deadline for it to object to general unsecured claims (the "Claim Objection **Deadline**") in the above-captioned chapter 11 cases (this "**Motion**"):

#### **Relief Requested**

1. The GUC Trust seeks to extend the Claim Objection Deadline by 180 days, from July 20, 2025 through and including January 16, 2026, pursuant to section 105(a) of

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) (the "Original Docket"). Unless otherwise indicated, docket references in the Motion refer to docket entries on the Original Docket.



4907-7694-8047V.6

chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 9013-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the "Bankruptcy Local Rules"), Section K of the Procedures for Complex Cases in the Southern District of Texas, effective October 18, 2023 (the "Complex Case Procedures"), and Section 4.I.2 of the Plan (defined below), without prejudice to the GUC Trust's ability to seek a further extension of the Claims Objection Deadline.<sup>2</sup>

- 2. In support of the Motion, the GUC Trust respectfully submits the Declaration of Peter Finkel in Support of Vertex GUC Trust's Motion for an Order Extending Deadline to Object to Claims, attached hereto as **Exhibit A** (the "**Finkel Declaration**").
- 3. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit B** (the "**Proposed Order**").

#### **Jurisdiction**

4. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. § 1334 and Article XI of the *Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates* (as supplemented and otherwise amended, the "**Plan**").<sup>3</sup> The Motion is a core proceeding pursuant to 28 U.S.C. § 157. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

The current Claim Objection Deadline is July 20, 2025. Section K of the Complex Case Procedures provides that, "if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion." By filing this Motion prior to the expiration of the Claim Objection Deadline, the Claim Objection Deadline is automatically extended until the Court resolves the Motion.

Docket No. 564. Capitalized terms used but not defined in this Motion have the meanings ascribed to them in the Plan.

### **Background**

- 5. On September 24, 2024 (the "**Petition Date**"), Vertex Energy, Inc. and certain of its affiliates (collectively, the "**Debtors**" or "**Reorganized Debtors**," as applicable) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. From and after the Petition Date, the Debtors operated their businesses and managed their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 6. On December 20, 2024, the Court entered an order confirming the Plan (the "Confirmation Order").<sup>4</sup> The Plan became effective on January 21, 2025 (the "Effective Date") and, on the Effective Date, the Debtors filed the Notice of (i) Entry of an Order Confirming the Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates and (ii) Occurrence of the Effective Date.<sup>5</sup>
- 7. The Plan and Confirmation Order established the GUC Trust on the Effective Date pursuant to the terms of the GUC Trust Agreement (the "**Trust Agreement**").<sup>6</sup> On the Effective Date, the GUC Trustee was appointed to administer the GUC Trust.
- 8. Article VII of the Plan provides that, "after the Effective Date, the Reorganized Debtors and the GUC Trustee (solely with respect to General Unsecured Claims and 2027 Convertible Notes Claims), as applicable, have the exclusive authority to (a) File, withdraw, or litigate to judgment any objections to Claims, (b) settle or compromise any such objections to Claims without further notice to or action, order, or approval of the Bankruptcy Court, and

Docket No. 578

<sup>5</sup> Docket No. 646

The substantially final form of the Trust Agreement was filed on December 17, 2024 as part of a Plan Supplement. Docket No. 544.

- (c) administer and adjust the Claims Register to reflect such settlements or compromises without further notice to or action, order, or approval of the Court."<sup>7</sup>
- 9. Pursuant to, and in accordance with, the Plan and Trust Agreement, the GUC Trust is authorized, among other things, to:
  - (a) hold, manage, sell, and invest GUC Trust Net Assets;
  - (b) calculate and make distributions of the GUC Trust Net Assets to its beneficiaries;
  - (c) commence, pursue, prosecute, enforce, abandon, waive, settle, compromise, release, or withdraw, as appropriate, any and all GUC Causes of Action; and
  - (d) review, reconcile, allow, object to, compromise, settle, withdraw, prosecute and resolve objections to Asserted GUC Trust Claims<sup>8</sup> in furtherance of the Unsecured Claims Reconciliation Process.<sup>9</sup>
- 10. The GUC Trust has the primary responsibility for the Unsecured Claims Reconciliation Process; provided, that the Debtors, Reorganized Debtors and Consenting Term Loan Lenders, in consultation with the GUC Trust, have the express right to object to and prosecute objections to Claims not allowed under the Plan.<sup>10</sup>
- 11. On April 1, 2025, the Court entered the Final Decree Closing Certain of the Chapter 11 Cases (the "**Final Decree**"), <sup>11</sup> which, among other things, closed all of the Debtors' chapter 11 cases except for Case No. 24-90508. Pursuant to the Final Decree, the Court retains

<sup>&</sup>lt;sup>7</sup> See Plan at Art. VII.B.

<sup>&</sup>quot;Asserted GUC Trust Claims" means any General Unsecured Claim or 2027 Convertible Notes Claim that is (i) scheduled in the Debtors' Schedules as a General Unsecured Claim or 2027 Convertible Notes Claim that is contingent, unliquidated, and/or disputed, (ii) based on a proof of claim that asserts to be a General Unsecured Claim or 2027 Convertible Notes Claim, or (iii) determined, or pending determination, by Final Order of the Court, to be a General Unsecured Claim or 2027 Convertible Notes Claim.

<sup>&</sup>lt;sup>9</sup> See Trust Agreement, at §§ 3.1.2, 3.1.5, 3.1.6 and 3.1.8.

<sup>&</sup>lt;sup>10</sup> See Plan at Art. IV.I.2.

<sup>&</sup>lt;sup>11</sup> Docket No. 760.

jurisdiction and authority over, among other things, the claims reconciliation process. The Final Decree also directs that any actions or pleadings regarding the claims reconciliation process be filed, administered, and/or adjudicated in Case No. 24-90508.<sup>12</sup>

## A. <u>Claims Reconciliation Process</u>

Deadlines for the Filing of Proofs of Claim, (II) Approving Form and Manner of Notice Thereof, (III) Approving the Form and Manner for Filing Proofs of Claim, and (IV) Granting Related Relief (the "Bar Date Order"). Among other things, the Bar Date Order established (i) November 27, 2024 at 4:00 p.m. as the deadline for creditors to file Proofs of Claim to assert any claims against the Debtors that arose before the Petition Date (the "General Bar Date") and (ii) March 24, 2025 at 4:00 p.m. as the deadline for Governmental Units to file Proofs of Claim to assert any claims against the Debtors that arose before the Petition Date (the "Governmental Bar Date"). The Bar Date Order also set the deadline to file a Proof of Claim relating to the Debtors' rejection of any executory contract or unexpired lease as the later of (a) the General Bar Date or Government Bar Date, as applicable, and (b) thirty (30) days after the entry of the order rejecting the applicable executory contract or unexpired lease.

- 13. On October 25-30, 2024, the Debtors filed their Schedules and Statements of Financial Affairs.<sup>14</sup>
- 14. Pursuant to the Plan, unless otherwise extended, the deadline for the GUCTrust to object to General Unsecured Claims and 2027 Convertible Notes Claims is 180 days after

Final Decree  $\P$  5. Prior to entry of the Final Decree, Case No. 24-90507 was the main case and docket for the Debtors' chapter 11 cases.

<sup>&</sup>lt;sup>13</sup> Docket No. 312.

Docket Nos. 260-308, 336-341.

the Effective Date (the "Claim Objection Deadline"). <sup>15</sup> The Claim Objection Deadline is currently July 20, 2025.

- To date, approximately 620 Proofs of Claim have been filed in the chapter 15. 11 cases, and approximately 642 Claims were scheduled. Filed and scheduled claims collectively total over \$1.3 billion. At least 446 Proofs of Claim and 640 scheduled Claims, collectively totaling over \$899.9 million, are identified as Asserted GUC Trust Claims.
- Since the Effective Date, the GUC Trust has, among other things, 16. undertaken its review of Asserted GUC Trust Claims, coordinated with the Reorganized Debtors to establish omnibus claim objection procedures ("Omnibus Claim Objection Procedures")<sup>16</sup> to streamline the claim reconciliation process, worked with the Reorganized Debtors to resolve certain claim issues consensually, and begun to assess the GUC Causes of Action. The approved Omnibus Claim Objection Procedures permit the GUC Trust to object to claims on an omnibus basis on the grounds set forth in Bankruptcy Rule 3007(d) and on certain additional approved grounds.
- 17. In addition, on July 16, 2025, the GUC Trust filed two omnibus objections to claims which collectively seek to expunge approximately \$46.4 million in Asserted GUC Trust Claims. The GUC Trust expects to file additional objections as its analysis of Asserted GUC Trust Claims continues.
- 18. Although the GUC Trust has made progress reconciling the Asserted GUC Trust Claims, additional work remains. The GUC Trust estimates that it will take at least another

See Plan at § 4.I.2.

Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief. Case No. 24-90508, Docket No. 8.

180 days to complete its review and reconciliation of the Asserted GUC Trust Claims and, therefore, believes an extension of the Claim Objection Deadline is necessary.

#### **Basis for Relief**

- 19. The Plan, Bankruptcy Code and Bankruptcy Rules provide ample authority for the Court to grant the requested relief. Additionally, the facts and circumstances of these chapter 11 cases demonstrate that cause exists to extend the Claim Objection Deadline.
- 20. First, pursuant to the Plan, "[a]ll objections to General Unsecured Claims and 2027 Convertible Notes Claims must be filed by the GUC Trustee within 180 days of the Effective Date, unless extended by order of the Bankruptcy Court." 17
- 21. Second, section 105(a) of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a); *see also In re Sanchez*, 372 B.R. 289, 309–10 (Bankr. S.D. Tex. 2007) (describing the scope of a bankruptcy court's authority under section 105(a)); *In re CEI Roofing, Inc.*, 315 B.R. 50, 55–56 (Bankr. N.D. Tex. 2004); *In re Cooper Props. Liquidating Trust, Inc.*, 61 B.R. 531, 537 (Bankr. W.D. Tenn. 1986) (noting that the bankruptcy court is "one of equity and as such it has a duty to protect whatever equities a debtor may have in property for the benefit of its creditors as long as that protection is implemented in a manner consistent with the bankruptcy laws.").
  - 22. Furthermore, Bankruptcy Rule 9006(b)(1) provides, in pertinent part, that: when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the

<sup>&</sup>lt;sup>17</sup> Plan § 4.I.2.

request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . . .

Fed. R. Bankr. P. 9006(b)(1).

- 23. Extensions of time to object to claims have been granted in other chapter 11 cases in this District where there are a substantial number of claims and complex issues. See, e.g., In re Dreamwell, Ltd., Case No. 23-90024 (CML) (Bankr. S.D. Tex. January 17, 2024) (Docket No. 67) (granting a first request to extend the deadline to object to claims by 180 days); *In re Dean* Foods Co., Case No. 19-36314 (CML) (Bankr. S.D. Tex. Dec. 7, 2022) (Docket No. 1130) (granting a second request to extend the deadline to object to claims by an additional 166 days); In re Griddy Energy, LLC, Case No. 21-30923 (MI) (Bankr. S.D. Tex. May 30, 2023) (Docket No. 513) (granting a second request to extend the deadline to object to claims by an additional 18 months); In re SpeedCast International Limited, et al., Case No. 20-32243 (MI) (Bankr. S.D. Tex. Jan. 26, 2023) (Docket No. 2037) (granting a fifth request to extend the deadline to object to claims by an additional 181 days); In re Chesapeake Energy Corporation, Case No. 20-33233 (DRJ) (Bankr. S.D. Tex. July 29, 2021) (Docket No. 3932) (initial deadline to object to claims extended by 180 days); In re Neiman Marcus Group Ltd LLC, et al., Case No. 20-32519 (DRJ) (Bankr. S.D. Tex. Mar. 23, 2021) (Docket No. 2352) (deadline to object to claims extended by 180 days).
- 24. The GUC Trust submits that cause exists to extend the Claim Objection Deadline for an additional 180 days through and including January 16, 2026. As discussed above, although the GUC Trust and its advisors have made progress, the GUC Trust continues to review and assess Claims that have been filed against the Debtors and requires additional time to complete such review and to negotiate with claimants, and to prepare and file objections to Claims, as necessary.

- 25. The GUC Trust further submits that the requested extension is not sought for purposes of delay and will not prejudice any Holders of Asserted GUC Trust Claims or other parties in interest. Absent the requested extension, creditors will be harmed because the GUC Trust will not be able to fully address all Asserted GUC Trust Claims before the expiration of the Claim Objection Deadline, and invalid or overstated Claims may receive unwarranted distributions from the GUC Trust, thereby diluting the recoveries on account of legitimate Claims, as a result. The requested relief will prevent such an inequitable result, is in the best interests of the GUC Trust and the Debtors' creditors and is necessary and appropriate to ensure that the Claims reconciliation process, including the prosecution of any objections to Asserted GUC Trust Claims, is accurate, comprehensive, and completed in a timely and efficient manner.
- 26. Accordingly, the GUC Trust respectfully requests that the Court enter an order extending the Claim Objection Deadline for an additional 180 days, from July 20, 2025 through and including January 16, 2026, without prejudice to the GUC Trust's ability to seek further extensions.

## **Notice**

27. Notice of this Motion will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

WHEREFORE the GUC Trust respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: July 16, 2025 Houston, Texas

/s/ James S. Carr

KELLEY DRYE & WARREN LLP

James S. Carr (admitted *pro hac vice*) Kristin S. Elliott (admitted *pro hac vice*) 175 Greenwich Street New York, New York 10007

Telephone: (212) 808-7800 Facsimile: (212) 808-7897 Email: jcarr@kelleydrye.com

kelliott@kelleydrye.com

Counsel for the Vertex GUC Trust

## **Certificate of Service**

I hereby certify that, on July 16, 2025, 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, and will be served as set forth in the Affidavit of Service to be filed by the Reorganized Debtor's claims, noticing, and solicitation agent.

/s/ Philip A. Weintraub
Philip A. Weintraub

# Exhibit A

# **Finkel Declaration**

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

In re:		Chapter 11
BANGO OIL LLC,	I	Case No. 24-90508 (CML)
	Reorganized Debtor.	(Jointly Administered)

# DECLARATION OF PETER FINKEL IN SUPPORT OF VERTEX GUC TRUST'S MOTION FOR AN ORDER EXTENDING DEADLINE TO OBJECT TO CLAIMS

- I, Peter Finkel, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:
- 1. I am a Vice President of U.S. Bank Trust Company, National Association ("U.S. Bank"), and an authorized representative of U.S. Bank in its capacity as the trustee (the "GUC Trustee") of the Vertex GUC Trust (the "GUC Trust") established in the above-captioned case. Under the Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates (the "Plan"),<sup>2</sup> the GUC Trust, by and through the GUC Trustee, is responsible for reconciling and, as necessary, objecting to all General Unsecured Claims or 2027 Convertible Notes Claims filed or scheduled against the Debtors' estates. In that capacity, I am familiar with, and am assisting in, the process of reviewing and reconciling the claims for which the GUC Trust is responsible.

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) (the "Original Docket"). Unless otherwise indicated, docket references in this declaration refer to docket entries on the Original Docket.

Docket No. 564.

- 2. Statements made in this Declaration are made to the best of my knowledge and belief and are based on the information and records available to me, including information, advice and analysis provided by professionals engaged by the GUC Trust. I am authorized to submit this declaration on behalf of the GUC Trust in support of *Vertex GUC Trust*'s *Motion for an Order Extending Deadline to Object to Claims* (the "Motion"),<sup>3</sup> filed contemporaneously herewith. If I were called upon to testify, I could and would competently testify to the facts set forth herein.
- 3. Approximately 620 Proofs of Claim were filed in the chapter 11 cases. In addition to the filed Proofs of Claim, the Debtors scheduled approximately 642 Claims. Collectively, filed and scheduled Claims assert over \$1.3 billion in Claims against the Debtors. Of those Claims, 446 Proofs of Claim and 640 scheduled Claims, totaling over \$899.9 million, have been identified as Asserted GUC Trust Claims.
- 4. Since the Effective Date, the GUC Trust has, among other things, undertaken its review of Asserted GUC Trust Claims, coordinated with the Reorganized Debtors to establish omnibus claim objection procedures ("Omnibus Claim Objection Procedures")<sup>4</sup> to streamline the claim reconciliation process, worked with the Reorganized Debtors to resolve certain claim issues consensually, and begun to assess the GUC Causes of Action.
- 5. In addition, on July 16, 2025, the GUC Trust filed two omnibus objections to claims which collectively seek to expunge approximately \$46.4 million in Asserted GUC Trust Claims. The GUC Trust expects to file additional objections as its analysis of Asserted GUC Trust Claims continues.

<sup>&</sup>lt;sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

<sup>&</sup>lt;sup>4</sup> See Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief. Case No 24-90508, Docket No. 8.

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6. Although the GUC Trust has made progress reconciling the Asserted GUC

Trust Claims, additional work remains. The GUC Trust estimates that it will take at least another

180 days to complete its review and reconciliation of the Asserted GUC Trust Claims and,

therefore, believes an extension of the Claim Objection Deadline is necessary.

7. To the best of my knowledge and belief, and based on the information and

records available to me, I believe that the requested extension of the Claim Objection Deadline is

reasonable and is not sought for the purposes of delay. I do not believe that the relief requested in

the Motion will prejudice any Holders of Asserted GUC Trust Claims or other parties in interest.

8. In light of the foregoing, to the best of my knowledge and belief, and based

on the information and records available to me, I believe that extending the Claim Objection

Deadline is necessary and appropriate to ensure that the Unsecured Claims Reconciliation Process,

including the prosecution of any objections to Claims is accurate, comprehensive, and completed

in a timely and efficient manner.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set

forth in the foregoing declaration are true and correct to the best of my knowledge, information,

and belief.

Dated: July 16, 2025

/s/ Peter Finkel

Peter Finkel

Default Relationship Manager

U.S. Bank Trust Company, National Association

# Exhibit B

# **Proposed Order**

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

BANGO OIL LLC,1 Case No. 24-90508 (CML)

> Reorganized Debtor. (Jointly Administered)

### ORDER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Upon the motion (the "Motion")<sup>2</sup> of the Vertex GUC Trust, seeking entry of an order (this "Order") pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(b), Bankruptcy Local Rule 9013-1, Section K of the Complex Case Procedures, and Section 4.I.2 of the Plan, extending the current Claim Objection Deadline, all as more fully set forth in the Motion and the Finkel Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and Article XI of the Plan; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or 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 overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and

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).

Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

it appearing that the relief requested in the Motion is in the best interests of the estates and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation

and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

The Claim Objection Deadline is hereby extended through and including 1.

January 16, 2026.

2. The entry of this Order shall be without prejudice to the ability of the GUC

Trust to seek a further extension of the Claim Objection Deadline upon a motion by the GUC Trust

filed on or before January 16, 2026, or to seek other appropriate relief.

3. This Court shall retain jurisdiction to hear and determine all matters arising

from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_\_, 2025 Houston, Texas

CHRISTOPHER M. LOPEZ

UNITED STATES BANKRUPTCY JUDGE