

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

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| In re: FLO-BACK EQUIPMENT INC., Debtor in a Foreign Proceeding. | § § § § § § § | Chapter 15 Case Case No. 24-90059 (MI) |
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NOTICE OF DESIGNATION AS COMPLEX CHAPTER 15 BANKRUPTCY CASE

FTI Consulting Canada Inc. (“FTI”), solely in its capacity as court appointed receiver and manager (“Receiver” or “Foreign Representative”) of Flo-Back Equipment Inc. (“FBE” or the “Debtor”), pursuant to the *Consent Receivership Order* dated December 8, 2023 (the “Receivership Order”), entered by the Court of King’s Bench of Alberta in Judicial Centre of Calgary, Alberta, Canada, Court File No. 2301-16371 (the “Canadian Court” and the “Canadian Proceeding”) pending under Canada’s *Bankruptcy and Insolvency Act* (“BIA”), and as authorized foreign representative of the Debtor, files this *Notice of Designation as a Complex Chapter 15 Case*. The undersigned counsel of the Foreign Representative believes that this chapter 15 case qualifies as a complex chapter 15 case because:

- X The Debtor has total debt of more than \$10 million;
- X There are more than 50 parties in interest in this case;
- _____ Claims against the Debtor are publicly traded;
- _____ Other (Substantial explanation is required. Attach additional sheets if necessary.)

Dated: February 20, 2024.

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ John D. Cornwell

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***Counsel for FTI Consulting Canada
Inc., solely in its capacity as court-
appointed receiver and manager of
Flo-Back Equipment Inc.***

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on February 20, 2024.

/s/ John D. Cornwell

John D. Cornwell

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ORDER GRANTING COMPLEX CASE TREATMENT
(Docket No. ___)

This case was filed on February 20, 2024. A Notice of Designation as Complex Chapter 15 Bankruptcy Case was filed. Based on its review of the initial pleadings, the Court concludes that the complex case designation is appropriate. Accordingly, the Court orders:

1. The Procedures for Complex Cases in the Southern District of Texas apply to this case. The procedures are posted on the Court’s website. Compliance with the procedures is required.
2. The Debtor must give notice of this Order to all parties in interest within seven days. If a party-in-interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.
3. The Bankruptcy Local Rules apply to this case, subject to the following modifications:
 - a. Bankruptcy Local Rule 1001-1(b) does not apply.
 - b. Local District Court Civil Rule 83.1 applies.
 - c. Appendix A to the Local Rules of the District Court applies.
 - d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Signed: _____

UNITED STATES BANKRUPTCY JUDGE