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ATTORNEYS FOR FTI CONSULTING CANADA INC.,  
SOLELY IN ITS CAPACITY AS RECEIVER AND MANAGER  
OF CUDA ENERGY INC., CUDA OIL AND GAS INC.,  
CUDA ENERGY LLC AND JUNEX INC.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WYOMING**

In re: )  
)  
CUDA ENERGY INC. ) Case No. 21-20484  
) Chapter 15  
)  
Debtor in Foreign Proceeding. )

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In re: )  
)  
CUDA ENERGY LLC ) Case No. 21-20485  
) Chapter 15  
)  
Debtor in Foreign Proceeding. )

\_\_\_\_\_)  
In re: )  
)  
CUDA OIL AND GAS, INC. ) Case No. 21-20486  
) Chapter 15  
)  
Debtor in Foreign Proceeding. )

\_\_\_\_\_)  
In re: )  
)  
JUNEX INC. ) Case No. 21-20487  
) Chapter 15  
)  
Debtor in Foreign Proceeding. )

**NOTICE OF PROPOSED AGREED SALE ORDER AND RESOLUTION OF  
UNITES STATES OF AMERICA’S OBJECTION TO MOTION FOR ENTRY OF  
ORDER APPROVING SALE OF ASSETS**

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FTI Consulting Canada Inc. in its capacity as court-appointed receiver, authorized foreign representative and manager of the assets (the “Receiver”) of Cuda Energy Inc., Cuda Oil and Gas Inc., Cuda Energy LLC, and Junex Inc. (collectively referred to as the “Debtors”), appointed by the Court of Queen’s Bench of Alberta, Canada (“Canadian Court”) in that certain Canadian proceeding Court File No. 2101-14158 (“Canadian Proceeding”), by and through Receiver’s undersigned counsel, Markus Williams Young & Hunsicker LLC, hereby files this Notice of Proposed Agreed Sale Order and resolution of the only objection to the Receiver’s Sale Motion (defined below) filed by the United States of America on behalf of its agency the United States Department of the Interior (“Interior”) through the Office of Natural Resources Revenue. The Receiver hereby provides notice and states as follows:

**BACKGROUND**

1. On April 22, 2022, the Receiver filed its *Motion For Entry of Order: (I) Approving Asset Purchase and Sale Agreement and Authorizing the Sale of Substantially All of Cuda Energy LLC’s Assets Under 11 U.S.C. §§ 363(b) and 363(m); (II) Authorizing the Sale of Assets Free and Clear of All Liens, Claims, Rights, Encumbrances and Other Interests Pursuant to 11 U.S.C. § 363(f); (III) Recognizing and Giving Full Force and Effect to the Order[s] of the Canadian Court Approving the Sale*

of *Substantially All Assets*, and (IV) *Granting Related Relief* (“Sale Motion”), at Docket No. 44.

2. On May 13, 2022, the Interior filed its Objection to Motion for Entry of Order Approving Sale of Assets (“Objection”) at Docket No. 54.

3. The deadline for objections to the Sale Motion was May 16, 2022. The Interior’s Objection was the only objection filed to the pending Sale Motion, and the deadline for any other objections has passed.

4. A hearing on the Sale Motion is scheduled with this Court for May 26, 2022 at 10:30 a.m.

### **NOTICE**

5. Counsel for the Receiver has conferred with counsel for the Interior regarding the Sale Motion and any concerns the Interior had with the Sale Motion and previously submitted proposed sale order. Without the need for Court intervention, and following those discussions, the Receiver and the Interior have resolved the Interior’s Objection through certain revisions to the proposed order for the Sale Motion. The result is a proposed agreed *Order (I) Approving Asset Purchase and Sale Agreement and Authorizing the Sale of Substantially All of Cuda Energy LLC’s Assets Under 11 U.S.C. §§ 363(b) and 363(m); (II) Authorizing the Sale of Assets Free and Clear of All Liens, Claims, Rights, Encumbrances and Other Interests Pursuant to 11 U.S.C. § 363(f); (III) Recognizing and Giving Full Force and Effect to Order[s] of the Canadian Court*

*Approving the Sale of Substantially All Assets, and (IV) Granting Related Relief* (the “Agreed Sale Order”).

6. A red-lined copy of the proposed Agreed Sale Order, incorporating the revisions resolving the Objection is attached hereto. Also attached is a clean copy of the proposed Agreed Sale Order with its Exhibit 1.

7. With the Agreed Sale Order submitted to this Court for consideration at the Sale Hearing, the Interior has confirmed that it no longer has any objection to the Sale Motion. In addition, the Interior will file an appropriate pleading with this Court to withdraw its Objection prior to the scheduled Sale Hearing.

8. Counsel for the Receiver also conferred with counsel for the purchaser COPL America Inc., a Delaware corporation (“Purchaser”) regarding the Agreed Sale Order. The Purchaser has agreed to the form of the Agreed Sale Order and entry of the Agreed Sale Order.

WHEREFORE, the Receiver hereby provides notice of the proposed Agreed Sale Order, and hereby submits the proposed Agreed Sale Order to this Court for consideration at the scheduled hearing on the Sale Motion.

Dated: May 18, 2022

MARKUS WILLIAMS YOUNG &  
HUNSICKER LLC

By: /s/ Matthew T. Faga

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*Counsel for FTI Consulting Canada Inc., As  
Court-Appointed Receiver of the Cuda Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion and a proposed order, was filed and served this 18<sup>th</sup> day of May, 2022, upon those registered for notice via CM/ECF.

/s/ Matthew Faga

Matthew T. Faga