

Louis R. Strubeck, Jr. (SBT 19425600)
louis.strubeck@nortonrosefulbright.com
Greg M. Wilkes (SBT 24047105)
greg.wilkes@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
Telephone: (214) 855-8000

Steve A. Peirce (SBT 15731200)
(admitted *pro hac vice*)
steve.peirce@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
111 West Houston Street, Suite 1800
San Antonio, TX 78205
Telephone: (210) 224-5575

ATTORNEYS FOR CANADIAN RECEIVER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 19-33868-15
EAGLE ENERGY INC.¹	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	
	§	Jointly Administered

**MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON
RECEIVER’S EXPEDITED MOTION FOR APPROVAL OF SALE PROCESS**

FTI Consulting Canada Inc. (“**FTI**”) solely in its capacity as court-appointed receiver and foreign representative of the Debtors (the “**Receiver**”) and states:

1. The Receiver has contemporaneously filed *Receiver’s Expedited Motion For Approval Of Sale Process* (“**US Sale Process Motion**”). The Receiver seeks expedited relief because the Receiver anticipates that the Canadian Court will sign a Canadian sale process order on or about February 19, 2020, and the Receiver seeks entry of a companion sale process order in this Court. Once the Canadian and US sale process orders are entered, the Receiver can

¹ The Debtors are: (1) Eagle Energy Inc., (2) Eagle Energy Trust, (3) Eagle Energy Holdings Inc., and (4) Eagle Hydrocarbons Inc.

pursue the approved sale process. The Receiver understands that this Court has reserved time for the hearing on the US Sale Process Motion Principal Motion for February 24, 2020 at 1:30 p.m., and requests a hearing at that date and time. Notice of the expedited hearing will be provided to all parties on the master service list in this matter.

Dated: February 12, 2020
Dallas, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

Louis R. Strubeck, Jr. (SBT 19425600)
louis.strubeck@nortonrosefulbright.com
Greg M. Wilkes (SBT 24047105)
greg.wilkes@nortonrosefulbright.com

2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
Telephone: (214) 855-8000
Facsimile: (214) 855-8200

and

/s/Steve A. Peirce

Steve A. Peirce (SBT 15731200)
(admitted *pro hac vice*)
steve.peirce@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
111 West Houston Street, Suite 1800
San Antonio, TX 78205
Telephone: (210) 224-5575
Facsimile: (210) 270-7205

COUNSEL FOR CANADIAN RECEIVER

CERTIFICATE OF CONFERENCE

Due to the numerous parties in interest in this case, it is not practicable to confer with all parties in interest about an expedited setting. The Receiver's counsel has conferred with counsel for White Oak, the major secured creditor, who has no objection to the proposed expedited setting.

/s/Steve A. Peirce

CERTIFICATE OF SERVICE

I hereby certify that contemporaneously with the filing of the foregoing, I directed noticing agent Stretto to serve a copy of the foregoing on parties in interest in this case. The Receiver will supplement this certificate of service with proof of service and a copy of such service list.

/s/Steve A. Peirce