

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

SAMSON RESOURCES CORPORATION,

Reorganized Debtor.

Chapter 11

Case No. 15-11934 (BLS)

Objection Deadline: December 27, 2021 at 4:00 p.m. (ET)

Hearing Date: TBD

**JOINT MOTION OF SETTLEMENT TRUST AND REORGANIZED DEBTOR
PURSUANT TO 11 U.S.C. §§ 105(a) AND 1142 AND BANKRUPTCY RULE 9006 FOR
ENTRY OF ORDER EXTENDING TIME TO FILE OBJECTIONS TO CLAIMS**

The Settlement Trust (the “**Settlement Trust**”) established pursuant to the *Global Settlement Joint Chapter 11 Plan of Reorganization of Samson Resources Corporation and Its Debtor Affiliates (with Technical Modifications)* [D.I. 2009] (the “**Plan**”)¹ together with the Reorganized Debtor (the “**Reorganized Debtor**”), by and through their undersigned counsel, submit this motion (the “**Motion**”) for entry of an order, pursuant to sections 105(a) and 1142 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), extending the deadline by which the Settlement Trust and Reorganized Debtor may file objections to Claims by approximately one hundred eighty (180) days, from December 13, 2021 to June 13, 2022.² In support of the Motion, the Settlement Trust and Reorganized Debtor respectfully represent as follows:

JURISDICTION

1. The Court has jurisdiction to consider and determine this matter pursuant to 28

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Plan.

² The day that is exactly 180 days following December 13, 2021 is June 11, 2021, a Saturday; June 13, 2021 is the next business day. Per Bankruptcy Rule 9006(a)(1)(C), when the last day of a period stated in days is a Saturday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.

U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are sections 105(a) and 1142 of the Bankruptcy Code and Bankruptcy Rule 9006.

BACKGROUND

A. General Case Background

3. On September 16, 2015, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court (the “**Chapter 11 Cases**”).

4. On February 13, 2017, the Court confirmed the Plan and entered the *Findings of Fact, Conclusions of Law, and Order Confirming Global Settlement Joint Chapter 11 Plan of Reorganization of Samson Resources Corporation and Its Debtor Affiliates* [D.I. 2019]. On February 28, 2017, the Initial Effective Date occurred. On March 1, 2017, all conditions to the effectiveness of the Plan had been satisfied or waived, and the Plan was substantially consummated.

5. On the Initial Effective Date, the Settlement Trust was established to, among other things, evaluate and prosecute objections to Disputed General Unsecured Claims.

B. Claims Objection Deadline

6. The Plan set the deadline for objecting to a Claim (the “**Claims Objection Deadline**”) as the “date that is the later of (a) 180 days after the Initial Effective Date and (b) such other period of limitation as may be specifically fixed by the Debtors or the Reorganized Debtors, as applicable, or by an order of the Court for objecting to such Claims.” (Plan, Art. I.A.23). As no specific date was fixed by the Debtors, the Reorganized Debtors, or the Court, the Claims Objection Deadline was originally August 27, 2017.

7. On August 23, 2017, the Reorganized Debtors filed the *Reorganized Debtors' Motion for Entry of an Order Extending the Deadline to Object to Allowance of Claims* [D.I. 2568] (the “**Reorganized Debtors' First Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to February 23, 2018.

8. On August 25, 2017, the Settlement Trust filed a *Motion of Settlement Trust Pursuant to 11 U.S.C. §§ 105(A) and 1142 and Bankruptcy Rule 9006 For Entry Of Order Extending Time To File Objections To Claims* [D.I. 2570] (the “**Settlement Trust's First Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to February 23, 2018.

9. On September 8, 2017, the Court entered an order granting the Reorganized Debtors' First Extension Motion [D.I. 2579]. On September 22, 2017, the Court entered an order granting the Settlement Trust's First Claim Extension Motion [D.I. 2888].

10. On February 23, 2018, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3035] (the “**Second Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to August 22, 2018.

11. On March 15, 2018, the Court entered an order granting the Second Claim Extension Motion [D.I. 3046].

12. On August 21, 2018, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3137] (the “**Third Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to February 19, 2019.

13. On September 6, 2018, the Court entered an order granting the Third Claim

Extension Motion [D.I. 3142].

14. On February 15, 2019, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3184] (the “**Fourth Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to July 31, 2019.

15. On March 7, 2019, the Court entered an order granting the Fourth Claim Extension Motion [D.I. 3189].

16. On July 30, 2019, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3217] (the “**Fifth Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to January 10, 2020.

17. On August 16, 2019, the Court entered an order granting the Fifth Claim Extension Motion [D.I. 3222].

18. On January 10, 2020, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3263] (the “**Sixth Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to June 18, 2020.

19. On January 30, 2020, the Court entered an order granting the Sixth Claim Extension Motion [D.I. 3274].

20. On June 18, 2020, Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3288] (the “**Seventh Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to December 15, 2020.

21. On July 6, 2020, the Court entered an order granting the Seventh Claim Extension Motion [D.I. 3292].

22. On December 15 2020, the Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3311] (the “**Eighth Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to June 14, 2021.

23. On January 4, 2021, the Court entered an order granting the Eighth Claim Extension Motion [D.I. 3314].

24. On June 14, 2021, the Settlement Trust and the Reorganized Debtor filed the Joint Motion Pursuant to 11 U.S.C §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims [D.I. 3325]. (the “**Ninth Claim Extension Motion**”) requesting the Court to extend the Claims Objection Deadline to December 13, 2021.

25. On July 12, 2021, the Court entered an order granting the Ninth Claim Extension Motion [D.I. 3325].³

26. Since the Initial Effective Date, the Settlement Trust and/or Reorganized Debtor(s) have filed twenty omnibus objections to Claims and have made substantial progress at clearing the claim register.⁴ Additionally, the Settlement Trust participated in a successful mediation with Nova Leasing that resulted in a significant reduction of a \$2 billion asserted general unsecured claim. As of the date of the filing of this Motion, over 2,000 Claims have been the subject of these twenty omnibus objections, and the Settlement Trust and Reorganized

³ Pursuant to Rule 9006-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the filing of this Motion prior to the current Claims Objection Deadline automatically extends the Claims Objection Deadline until such time as the Court rules on the Motion.

⁴ D.I. 2353, 2354, 2355, 2356, 2417, 2418, 2419, 2420, 2945, 2946, 2947, 2997, 2998, 3100, 3101, 3103, 3104, & 3188.

Debtor(s) have expunged over \$84 billion worth of Claims.

27. While the Settlement Trust and Reorganized Debtor have made substantial progress in claims reconciliations and believe the reconciliation process to be substantially complete, in an abundance of caution, the Settlement Trust and Reorganized Debtor request an extension of the current Claims Objection Deadline to ensure that the claims review and reconciliation process is complete and to ensure that proper distributions are made on any and all remaining allowed claims.

RELIEF REQUESTED

28. The Settlement Trust and Reorganized Debtor respectfully request entry of an order, substantially in the form attached hereto as Exhibit A (the “**Proposed Order**”), extending the Claims Objection Deadline by approximately 180 days to June 13, 2022, without prejudice to the ability of the Settlement Trust and Reorganized Debtor to request further extensions of the Claims Objection Deadline.

BASIS FOR RELIEF REQUESTED

29. Extending the Claims Objection Deadline is consistent with the Court’s broad authority, pursuant to sections 105(a) and 1142 of the Bankruptcy Code, to issue orders necessary to implement the provisions of the Plan and the Bankruptcy Code. *See* 11 U.S.C. § 105(a) (“The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].”); *id.* § 1142(b) (“The court may direct the debtor . . . to perform any other act . . . that is necessary for the consummation of the plan.”); *see also Binder v. Price Waterhouse & Co., LLP (In re Resorts Int’l, Inc.)*, 372 F.3d 154, 165 (3d Cir. 2004) (noting that section 1142(b) “assumes that post-confirmation jurisdiction exists for disputes concerning the consummation of a confirmed plan” and that 28 U.S.C. § 1334 “remains

the source of this jurisdiction”).

30. Moreover, Bankruptcy Rule 9006 (b)(1) provides, in pertinent part:

[W]hen 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 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).

31. Further, the Court has the inherent power to control its docket, including controlling the timing of proceedings. *See, e.g., Greatbatch Ltd. v. AVX Corp.*, 179 F. Supp. 3d 370, 380 (D. Del. 2016) (“District Courts have inherent power to manage their own docket”). Moreover, courts in this District regularly exercise this “inherent power,” as extensions of the time to object to claims have been routinely granted. *See, e.g., In re NewPage Corp.*, Ch. 11 Case No. 11-12804 (KG) (Bankr. D. Del. Aug. 11, 2017) (initial 360-day claims objection deadline extended nearly four years); *In re Tribune Media Co.*, Ch. 11 Case No. 08-13141 (KJC) (Bankr. D. Del. July 21, 2017) (initial claims objection deadline extended by more than four years); *In re Verso Corp.*, Ch. 11 Case No. 16-10163 (KG) (Bankr. D. Del. June 28, 2017) (initial claims objection deadline extended nine months); *In re Swift Energy Co.*, Ch. 11 Case No. 15-12670 (MFW) (Bankr. D. Del. May 25, 2017) (initial claims objection deadline extended nearly one year); *In re Trump Entm’t Resorts, Inc.*, Ch. 11 Case No. 14-12103 (KG) (Bankr. D. Del. Mar. 9, 2017) (non-administrative expense claims objection deadline extended approximately 180 days); *In re FBI Wind Down, Inc.*, Ch. 11 Case No. 13-12329 (CSS) (Bankr. D. Del. Oct. 14, 2016) (initial claims objection deadline extended by more than two years).

CAUSE EXISTS TO EXTEND THE CLAIMS OBJECTION DEADLINE

32. Cause exists to extend the Claims Objection Deadline to allow the Settlement

Trust and the Reorganized Debtor additional time to reconcile Claims and prosecute objections to Disputed Claims. Since the Initial Effective Date, the Settlement Trust and Reorganized Debtor have worked diligently to review and reconcile outstanding and unresolved General Unsecured Claims in an effort to thoroughly analyze such Claims and prepare objections to Claims where appropriate. To date, the Settlement Trust and/or Reorganized Debtor(s) have filed twenty omnibus objections to Claims, and the Settlement Trust has made distributions to holders of over \$2.35 billion in Allowed General Unsecured Claims. Additionally, the Settlement Trust participated in a successful mediation with Nova Leasing that resulted in a significant reduction of a \$2 billion asserted general unsecured claim. Although substantial progress has been made, the Settlement Trust and Reorganized Debtor need additional time to reconcile, object to, or resolve the remaining Disputed Claims, including ensuring that such outstanding Claims, to the extent Allowed, are Allowed in the correct amount, priority, and classification.

33. Indeed, the claims reconciliation process has been costly and time consuming. Immediately following the Initial Effective Date, the Settlement Trust and Reorganized Debtor(s) were confronted with the task of reconciling over \$80 billion of asserted Claims, the allowance of which effectively would have eliminated virtually all recoveries of holders of Allowed General Unsecured Claims. *See Debtors' Second Omnibus (Substantive) Claims Objection* [D.I. 2015] (the "**Second Omnibus Objection**"). Specifically, the Settlement Trust Assets consisted primarily of \$168.5 million in cash, *i.e.*, the Settlement Trust Cash Amount, for the benefit of holders of Allowed General Unsecured Claims estimated at approximately \$2.4 billion, providing for a projected 7.0%-7.5% recovery under the Plan. Even if a small fraction of the Claims that were the subject of the Second Omnibus Objection had been Allowed as General

Unsecured Claims, beneficial owners of the Settlement Trust would have received a far lower percentage recovery on their respective Allowed General Unsecured Claims. To that end, the Settlement Trust and Reorganized Debtor have continued to work to ensure that the projected range of recovery under the Plan would not be reduced by filing and prosecuting the twenty omnibus claim objections.

34. An extension of the Claims Objection Deadline is necessary to enable the Settlement Trust and the Reorganized Debtor to complete the analysis and resolution of the remaining outstanding Claims so that final distributions to holders of Allowed General Unsecured Claims can be made. Such extension would be beneficial to creditors and parties in interest. It will, for example, enable the Settlement Trust and the Reorganized Debtor to continue to engage in meaningful negotiations to resolve Claims consensually, obviating the need to file objections in many cases. Resolving a Claim without a formal objection benefits the holder of the Disputed Claim, the Settlement Trust's beneficial owners, and the Reorganized Debtor because it avoids the burden, cost, and expense of litigation.

35. Absent an extension of the Claims Objection Deadline, the Settlement Trust and Reorganized Debtor would have to proceed in one of two ways, neither of which is in the best interests of the Settlement Trust or the Reorganized Debtor: either (i) forgo filing certain meritorious objections to Claims, creating a windfall for holders of such Claims as a result of the "deemed allowance" of such Claims, or (ii) file prophylactic objections before the Claims Objection Deadline, which would be needlessly burdensome for the Settlement Trust, the Reorganized Debtor, the holders of such Claims, and the Court. Moreover, holders of unresolved Claims will not be prejudiced by an extension of the Claims Objection Deadline.

Extending the Claims Objection Deadline will not deprive holders of Claims from having a full and fair opportunity to be heard if and when any objection to such Claims are litigated.

RESERVATION OF RIGHTS

36. The Settlement Trust and Reorganized Debtor reserve their rights to seek further extensions of the Claims Objection Deadline.

NOTICE

37. The Settlement Trust and Reorganized Debtor will provide notice of this Motion to (a) the Office of the U.S. Trustee for the District of Delaware, and (b) those parties requesting notice pursuant to Bankruptcy Rule 2002. The Settlement Trust and Reorganized Debtor submit that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE the Settlement Trust and Reorganized Debtor respectfully request that the Court enter an order, substantially in the form annexed hereto as Exhibit A, granting the relief requested herein and such other and further relief as the Court deems just and proper.

Dated: December 13, 2021
Wilmington, Delaware

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
SAMSON RESOURCES CORPORATION, ¹)	Case No. 15-11934 (BLS)
)	
Reorganized Debtor.)	
)	Obj. Deadline: December 27, 2021 at 4:00 p.m. (ET)
)	Hearing Date: TBD

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on December 13, 2021, the above-captioned reorganized debtor (the “Reorganized Debtor”) filed the **Joint Motion of Settlement Trust and Reorganized Debtor Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule 9006 for Entry of Order Extending Time to File Objections to Claims** (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel for the Reorganized Debtor and the Settlement Trust on or before **December 27, 2021 at 4:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed and served in accordance herewith, a hearing to consider such objection and the Motion will be held before The Honorable Brendan L. Shannon, United States Bankruptcy Judge, at the Bankruptcy

¹ The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Samson Resources Corporation (1227). The location of the Reorganized Debtor’s corporate headquarters and service address is: 15 East 5th Street, Suite 1000, Tulsa, Oklahoma 74103.

Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801 on a **date and time to be determined**.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED AND SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 13, 2021
Wilmington, Delaware

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EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

SAMSON RESOURCES CORPORATION, *et al.*,

Reorganized Debtor.

Chapter 11

Case No. 15-11934 (BLS)

RE: D.I. _____

**ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 1142
AND BANKRUPTCY RULE 9006
EXTENDING TIME TO FILE OBJECTIONS TO CLAIMS**

Upon consideration of the joint motion (the “**Motion**”)¹ of the Settlement Trust and Reorganized Debtor, pursuant to sections 105(a) and 1142 of the Bankruptcy Code and Bankruptcy Rule 9006, for entry of an order extending the current deadline by which the Settlement Trust and Reorganized Debtor may file objections to Claims by approximately one hundred eighty (180) days to June 13, 2022; and this Court having jurisdiction to consider the Motion and the relief requested therein; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice of the Motion need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is:

ORDERED that the Motion is GRANTED as set forth herein; and it is further

ORDERED that the Claims Objection Deadline is extended to and including June 13, 2022; and it is further

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

ORDERED that the Settlement Trust and Reorganized Debtor may request further extensions of the Claims Objection Deadline; and it is further

ORDERED that this Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.