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

In re:	)	Chapter 11
SAMSON RESOURCES CORPORATION, et al.,1	)	Case No. 15-11934 (CSS)
Debtors.	)	Jointly Administered
	)	

NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR HEARING ON NOVEMBER 16, 2016 AT 10:00 A.M. (ET)<sup>2</sup>

#### CONTINUED/WITHDRAWN MATTERS:

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of (A) Operating Expenses, (B) Joint Interest Billings, (C) Marketing Expenses, (D) Shipping and Warehousing Claims, and (E) 503(b)(9) Claims, and (II) Confirming Administrative Expense Priority of Outstanding Orders [Docket No. 6; Filed 9/17/2015]

#### Related Documents:

- A. Interim Order (I) Authorizing the Payment of (A) Operating Expenses, (B) Joint Interest Billings, (C) Marketing Expenses, (D) Shipping and Warehousing Claims, and (E) 503(b)(9) Claims, and (II) Confirming Administrative Expense Priority of Outstanding Orders [Docket No. 88; Filed 9/22/2015]
- B. Second Interim Order (I) Authorizing the Payment of (A) Operating Expenses, (B) Joint Interest Billings, (C) Marketing Expenses, (D) Shipping and Warehousing Claims, and (E) 503(b)(9) Claims, and (II) Confirming Administrative Expense Priority of Outstanding Orders [Docket No. 186; Filed 10/14/2015]

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Geodyne Resources, Inc. (2703); Samson Contour Energy Co. (7267); Samson Contour Energy E&P, LLC (2502); Samson Holdings, Inc. (8587); Samson-International, Ltd. (4039); Samson Investment Company (1091); Samson Lone Star, LLC (9455); Samson Resources Company (8007); and Samson Resources Corporation (1227). The location of parent Debtor Samson Resources Corporation's corporate headquarters and the Debtors' service address is: Two West Second Street, Tulsa, Oklahoma 74103.

Parties who are unable to attend the hearing in person may participate by telephone by contacting CourtCall an independent conference call company, at 866-582-6878. Please refer to the Court's website at www.deb.uscourts.gov (in the "General Information under the Judges' Info" section) for complete information and instructions. A copy of each pleading can be viewed on the Court's website at https://ecf.deb.uscourts.gov and on the website of the Debtors' proposed notice and claims agent, Garden City Group, LLC at http://www.gardencitygroup.com/cases/SamsonRestructuring. Further information may be obtained by calling (888) 547-8096 or emailing to SMNInfo@gardencitygroup.com

Response Deadline: October 8, 2015 at 4:00 p.m., extended until October 22,

2015 at 4:00 p.m., solely for the Office of the United States Trustee and Official Committee of Unsecured Creditors to

file formal responses (if any).

# Responses Received:

- A. Omnibus Objection of Official Committee of Unsecured Creditors to (1) Debtors' Motion for Entry of Final Order (I) Authorizing Payment of (A) Operating Expenses, (B) Joint Interest Billings, (C) Marketing Expenses, (D) Shipping and Warehousing Claims, and (E) 503(b)(9) Claims, and (II) Confirming Administrative Expense Priority of Outstanding Orders and (2) Debtors' Motion for Entry of Final Order Authorizing Payment of Certain Prepetition Taxes and Fees [Docket No. 253; Filed 10/22/2015]
- B. Debtors' Reply in Support of the Debtors' Lien Claimants Motion and Taxes Motion and in Response to the Committee's Objection Thereto [Docket No. 267, Filed 10/26/15]

Status: This matter has been continued until December 19, 2016 at 12:00 p.m.

2. Debtors' Motion for Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rules 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-2, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b), and (IV) Granting Related Relief [Docket No. 22; Filed 9/17/2015]

#### Related Documents:

- A. Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rules 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-2, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b), and (IV) Granting Related Relief [Docket No. 111; Filed 9/25/2015]
- B. Second Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rules 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-2, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b), and (IV) Granting Related Relief [Docket No. 316; Filed 11/4/2015]

- C. Third Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rules 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-2, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b), and (IV) Granting Related Relief [Docket No. 379; Filed 11/20/2015]
- D. Fourth Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rules 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-2, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b), and (IV) Granting Related Relief [Docket No. 483; Filed 12/17/2015]
- E. Fifth Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 610; Filed 1/26/2016]
- F. Sixth Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 789; Filed 3/21/2016]
- G. Seventh Interim Order (I) Authorizing Postpetition Use Of Cash Collateral, (II) Granting Adequate Protection To The Prepetition Secured Parties, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief [Docket No. 1016; Filed 6/3/2016]

Response Deadline: October 22, 2015 at 4:00 p.m., extended until January 14, 2016 at 4:00 p.m. solely for the Office of the United States Trustee and Official Committee of Unsecured Creditors to file formal responses (if any).

# Responses Received:

A. Objection of Lloyd Ness and Mary Ness to cash collateral, balance sheets and performance incentivizing program [Docket No. 338; Docketed 11/13/2015]

Status: This matter has been continued until December 19, 2016 at 12:00 p.m.

3. Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 474; Filed 12/15/2015]

#### Related Documents:

- A. Notice of Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 475; Filed 12/15/2015]
- B. Letter from Calvin Williams [Docket No. 512; Filed 12/22/2015]
- C. Motion to File Under Seal [Docket No. 533; Filed 12/30/2015]
- D. Notice of Filing of Redacted Report of November 17, 2015 Data Breach and Wire Fraud [Docket No. 595; Filed 1/20/2016]

Response Deadline: December 29, 2015 at 4:00 p.m., extended for all parties until December 30, 2015 at 4:00 p.m.

# Responses Received:

- A. Objection of the Official Committee of Unsecured Creditors to Acting United States Trustee' Motion For an Order Directing the Appointment of an Examiner [Docket No. 528; Filed 12/30/2015]
- B. Debtors' Objection to Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 530; Filed 12/30/2015]
- C. Declaration of John L. Stuart in Support of the Debtors' Objection to Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 531; Filed 12/30/2015]
- D. Declaration of Alan B. Miller in Support of Debtors' Objection to Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 532; Filed 12/30/2015]
- E. [SEALED] Debtors' Objection to Acting United States Trustee's Motion for an Order Directing the Appointment of an Examiner [Docket No. 534; Filed 12/30/2015]
- F. Response to Debtors' Objection Regarding Third Party Examiner and Motion to File Under Seal [Docket No. 591; Filed 1/20/2016]
- G. Response to Debtors' Objection Regarding Third Party Examiner and Motion to File Under Seal [Docket No. 618; Filed 1/29/2016]

H. Objection to Debtor's Motion to Appointment of a Third Party Examiner [Docket No. 663; Filed 2/12/2016]

Status: This motion is withdrawn by the Acting United States Trustee.

4. [SEALED] Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1248; Filed 8/12/2016]

## Related Documents:

- A. [REDACTED] Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1250; Filed 8/12/2016]
- B. [REDACTED] Declaration of Ana M. Alfonso [Docket No. 1363; Filed 9/16/2016]
- C. [SEALED] Declaration of Ana M. Alfonso [Docket No. 1365; Filed 9/16/2016]
- D. Notice of Continuance of Hearing with Respect to the Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1496; Filed 10/11/2016]

Response Deadline: August 26, 2016 at 4:00 p.m., extended to the earlier of (i) September 16, 2016, and (ii) a date to be agreed by the creditors' committee and the Debtors.

## Responses Received:

- A. [SEALED] Objection to the Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1340; Filed 9/12/2016]
- B. [REDACTED] Objection to the Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle

- Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1341; Filed 9/12/2016]
- C. [REDACTED] Response of the Second Lien Agent, on Behalf of the Second Lien Secured Parties, to Official Committee of Unsecured Creditors' Motion for Leave, Standing and Authority to Commence, Prosecute and Settle Certain Claims and Causes of Action on Behalf of the Debtors' Estates [Docket No. 1359; Filed 9/16/2016]
- D. [SEALED] Debtors' Objection to Creditors' Committee's Motion for Standing [Docket No. 1360; Filed 9/16/2016]
- E. [SEALED] Response of the Second Lien Agent, on Behalf of the Second Lien Secured Parties, to Official Committee of Unsecured Creditors' Motion for Leave, Standing and Authority to Commence, Prosecute and Settle Certain Claims and Causes of Action on Behalf of the Debtors' Estates [Docket No. 1361; Filed 9/16/2016]
- F. [SEALED] Declaration of Robert Gretch in Support of the Debtors' Objection to Creditors' Committee's Motion for Standing [Docket No. 1364; Filed 9/16/2016]

Status: This matter has been continued until December 19, 2016 at 12:00 p.m.

5. Motion of the Official Committee of Unsecured Creditors for Entry of Order Pursuant to 11 U.S.C. Sec. 105(a) and 107(b) and Fed. R. Bankr. P. 9018 Authorizing Filing of Certain Information under Temporary Seal in Connection with Its Motion for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1249; Filed 8/12/2016]

#### Related Documents:

A. [SEALED] Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1248; Filed 8/12/2016]

Response Deadline: August 26, 2016 at 4:00 p.m.

Responses Received: None to date.

Status: This matter has been continued until December 19, 2016 at 12:00

p.m.

6. Motion to File Under Seal the Objection to the Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1342; Filed 9/12/2016]

### Related Documents:

A. [SEALED] Objection to the Motion of the Official Committee of Unsecured Creditors for Entry of Order Granting Exclusive Standing and Authority to Commence, Prosecute, and Settle Certain Claims and Causes of Action on Behalf of Debtors' Estates [Docket No. 1340; Filed 9/12/2016]

Response Deadline: September 26, 2016 at 4:00 p.m.

Responses Received: None

Status: This matter has been continued until December 19, 2016 at 12:00

p.m.

7. Motion to File Under Seal Unredacted Versions of the (I) Response of the Second Lien Agent, on Behalf of the Second Lien Secured Parties, to Official Committee of Unsecured Creditors Motion for Leave, Standing and Authority to Commence, Prosecute and Settle Certain Claims and Causes of Action on Behalf of the Debtors' Estates; and (II) Certain Exhibits Attached to the Declaration of Ana M. Alfonso [Docket No. 1358; Filed 9/16/2016]

#### Related Documents:

- A. [SEALED] Response of the Second Lien Agent, on Behalf of the Second Lien Secured Parties, to Official Committee of Unsecured Creditors' Motion for Leave, Standing and Authority to Commence, Prosecute and Settle Certain Claims and Causes of Action on Behalf of the Debtors' Estates [Docket No. 1361; Filed 9/16/2016]
- B. [SEALED] Declaration of Ana M. Alfonso [Docket No. 1365; Filed 9/16/2016]

Response Deadline: September 30, 2016 at 4:00 p.m.

Responses Received: None

Status: This matter has been continued until December 19, 2016 at 12:00

p.m.

8. Debtors' Motion to File Documents Under Seal [Docket No. 1366; Filed 9/16/2016]

#### Related Documents:

A. [SEALED] Debtors' Objection to Creditors' Committee's Motion for Standing [Docket No. 1360; Filed 9/16/2016]

B. [SEALED] Declaration of Robert Gretch in Support of the Debtors' Objection to Creditors' Committee's Motion for Standing [Docket No. 1364; Filed 9/16/2016]

Response Deadline: September 30, 2016 at 4:00 p.m.

Responses Received: None

Status: This matter has been continued until December 19, 2016 at 12:00

p.m.

9. Debtors' Motion for Entry of an Order (A) Appointing a Mediator and (B) Granting Related Relief [Docket No. 1442; Filed 10/4/2016]

#### Related Documents:

A. Notice of Debtors' Motion for Entry of an Order (A) Appointing a Mediator and (B) Granting Related Relief [Docket No. 1449; Filed 10/5/2016]

Response Deadline: October 19, 2016 at 4:00 p.m.

#### Responses Received:

A. Official Committee of Unsecured Creditors' (I) Objection to Debtors' Motion to Shorten Notice Period for Debtors' Motion for Entry of Order (A) Appointing a Mediator and (B) Granting Related Relief and (II) Preliminary Objection to Debtors' Motion for Entry of Order (A) Appointing a Mediator and (B) Granting Related Relief [Docket No. 1445; Filed 10/5/2016]

Status: This matter has been continued until November 30, 2016 at 1:00 p.m.

10. Interim Fee Applications for Professionals

## Related Documents:

- A. Fee Application Index for Hearing
- B. Proposed Order

Status: This matter is continued until January 17, 2017 at 10:00 a.m.

## UNCONTESTED MATTERS WITH A CERTIFICATE OF NO OBJECTION:

11. Application to Employ Godfrey & Kahn, S.C. as Counsel to the Fee Examiner, nunc pro tunc to June 24, 2016 [Docket No. 1370; Filed 9/19/2016]

## Related Documents:

- A. Amended Certificate of No Objection [Docket No. 1504; Filed 10/12/2016]
- B. Proposed Order

Status: A Certificate of No Objection has been filed. This matter is going forward unless otherwise directed by the Court.

12. Application to Employ Benesch, Friedlander, Coplan & Aronoff, LLP as Delaware Cocunsel to Fee Examiner [Docket No. 1422; Filed 9/29/2016]

#### Related Documents:

- A. Certificate of No Objection [Docket No. 1556; Filed 10/19/2016]
- B. Proposed Order

Status: A Certificate of No Objection has been filed. This matter is going forward unless otherwise directed by the Court.

# **CONTESTED MATTERS**:

13. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 8; Filed 9/17/2015]

## Related Documents:

A. Interim Order Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 90; Filed 9/22/2015]

- B. Second Interim Order Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 188; Filed 10/14/2015]
- C. Third Interim Order Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 305; Filed 10/30/2015]
- D. Fourth Interim Order Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 358; Filed 11/17/2015]

Response Deadline: October 8, 2015 at 4:00 p.m., extended until October 22, 2015 at 4:00 p.m., solely for the Office of the United States Trustee and Official Committee of Unsecured Creditors to file formal responses (if any).

# Responses Received:

- A. Omnibus Objection of Official Committee of Unsecured Creditors to (1) Debtors' Motion for Entry of Final Order (I) Authorizing Payment of (A) Operating Expenses, (B) Joint Interest Billings, (C) Marketing Expenses, (D) Shipping And Warehousing Claims, and (E) 503(b)(9) Claims, and (II) Confirming Administrative Expense Priority of Outstanding Orders and (2) Debtors' Motion for Entry of Final Order Authorizing Payment of Certain Prepetition Taxes and Fees [Docket No. 253; Filed 10/22/2015]
- B. Debtors' Reply in Support of the Debtors' Lien Claimants Motion and Taxes Motion and in Response to the Committee's Objection Thereto [Docket No. 267, Filed 10/26/15]

Status: This matter is going forward. The Debtors anticipate requesting incremental relief.

14. Motion of Lloyd & Mary Ness to Alter Judgment of a Claim Worthy [Docket No. 1408; Filed 9/15/2016]

## Related Documents:

- A. Notice of Hearing [Docket No. 1428; Filed 9/30/2016]
- B. Supplement to Motion for Alteration Amendment of a Judgment of a Claim Worthy [Docket No. 1570; Filed 10/17/2016]
- C. Debtors' Motion to File Sealed Documents Regarding Debtors' Objection to Lloyd Ness's Motion for Reconsideration [Docket No. 1631; Filed 11/9/2016]

Response Deadline: November 9, 2016 at 4:00 p.m.

Responses Received:

- A. [SEALED] Debtors' Objection to Lloyd Ness's Motion for Reconsideration [Docket No. 1632; Filed 11/9/2016]
- B. [REDACTED] Debtors' Objection to Lloyd Ness's Motion for Reconsideration [Docket No. 1633; Filed 11/9/2016]

Status: This matter is going forward.

15. Motion of Calvin Williams to Amend or Alter the Judgment Pursuant to Fed.R. Civ.P 59(e) to Prevent Manifest Injustice [Docket No. 1446; Filed 9/15/2016]

## **Related Documents:**

A. Notice of Hearing [Docket No. 1453; Filed 10/6/2016]

Response Deadline: November 9, 2016 at 4:00 p.m.

# Responses Received:

A. Debtors' Objection to Calvin Williams's Motion to Alter or Amend Judgment [Docket No. 1630; Filed 11/9/2016]

Status: This matter is going forward.

Dated: November 14, 2016 Wilmington, Delaware

# /s/ Domenic E. Pacitti

Domenic E. Pacitti, Esq. (DE Bar No. 3989) Michael W. Yurkewicz, Esq. (DE Bar No. 4165)

# KLEHR HARRISON HARVEY BRANZBURG LLP

919 N. Market Street, Suite 1000 Wilmington, Delaware 19801 Telephone: (302) 426-1189 Facsimile: (302) 426-9193

-and-

Morton Branzburg (admitted *pro hac vice*)

# KLEHR HARRISON HARVEY BRANZBURG LLP

1835 Market Street, Suite 1400 Philadelphia, Pennsylvania 19103 Telephone: (215) 569-2700 Facsimile: (215) 568-6603

-and-

Paul M. Basta, P.C. (admitted *pro hac vice*) Edward O. Sassower, P.C. (admitted *pro hac vice*) Joshua A. Sussberg, P.C. (admitted *pro hac vice*)

# KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, New York 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

-and-

James H.M. Sprayregen, P.C.

Ross M. Kwasteniet (admitted pro hac vice)

Brad Weiland (admitted pro hac vice)

# KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Co-Counsel for the Debtors and Debtors in Possession