



**JOINT MOTION TO CONTINUE MARCH 7, 2023 HEARING ON  
RECEIVER’S MOTION FOR AUTHORITY TO ABANDON INTERESTS  
IN OIL AND GAS PROPERTIES [ECF NO. 296]**

TO THE HONORABLE U.S. MAGISTRATE JUDGE HAL R. RAY, JR.:

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Receivership Order), and the Railroad Commission of Texas, through the Texas Office of the Attorney General (the “RRC”), file this *Joint Motion to Continue March 7, 2023 Hearing on Receiver’s Motion for Authority to Abandon Interests in Oil and Gas Properties [ECF No. 296]* (the “Motion”) and respectfully submit to the Court as follows:

1. The Court set an in-person hearing on the *Receiver’s Motion for Authority to Abandon Interests in Oil and Gas Properties [ECF No. 296]* (the “Oil and Gas Abandonment Motion”) on March 7, 2023, at 1:30 p.m. Central. *See generally* ECF No. 318.

2. The Receiver is working with the RRC to resolve or narrow the issues raised in the Oil and Gas Abandonment Motion, which included a meeting on February 9, 2023.

3. The Receiver and the RRC need additional time to attempt to at least narrow the issues raised or which may be raised in the Oil and Gas Abandonment Motion. Thus, the Receiver and the RRC respectfully request that the Court continue the hearing on the Oil and Gas Abandonment Motion for at least sixty (60) days, or as the Court might otherwise direct.

4. In conjunction with continuing the hearing on the Oil and Gas Abandonment Motion, the Receiver respectfully requests that the Court extend the response or objection deadline for the Oil and Gas Abandonment Motion to be no later than two (2) weeks prior to the scheduled hearing date. Additionally, the Receiver would request that the Court order that all exhibits be exchanged amongst the respective parties no later than one (1) week prior to the scheduled hearing date.

WHEREFORE, the Receiver and the RRC respectfully request that the Court grant the Motion, substantially in the form attached here to as **Exhibit A**.

Dated: February 13, 2023

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

Danielle Rushing Behrends

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*Attorneys for the Railroad Commission of Texas*

**CERTIFICATE OF CONFERENCE**

The Receiver, through the undersigned counsel, conferred with counsel for Plaintiff, Securities and Exchange Commission (the "Commission") on February 10, 2023, regarding the relief requested in the Motion. The Commission consents to the relief requested in the Motion.

*/s/ Danielle Rushing Behrends*  
Danielle Rushing Behrends

**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2023, the foregoing document was served via CM/ECF on all parties appearing in this Case, including counsel for Plaintiff, Securities and Exchange Commission, and on the following via U.S. first-class mail:

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*/s/ Danielle Rushing Behrends*

Danielle Rushing Behrends

**EXHIBIT A**





**ORDER GRANTING JOINT MOTION TO CONTINUE MARCH 7, 2023 HEARING ON RECEIVER'S MOTION FOR AUTHORITY TO ABANDON INTERESTS IN OIL AND GAS PROPERTIES [ECF NO. 296]**

CAME ON THIS DAY to be considered, the *Joint Motion to Continue March 7, 2023 Hearing on Receiver's Motion for Authority to Abandon Interest in Oil and Gas Properties [ECF No. 296]* (the "Motion").<sup>1</sup> After considering the Motion, any supporting papers, and any responses thereto, the Court is of the opinion that said Motion should be **GRANTED** in all respects. **IT IS THEREFORE ORDERED** that:

1. The Motion is **GRANTED** in all respects.
2. The March 7, 2023 hearing on the *Receiver's Motion for Authority to Abandon Interest in Oil and Gas Properties [ECF No. 296]* (the "Oil and Gas Abandonment Motion") is continued to \_\_\_\_\_, 2023, at \_:\_\_ .m.
3. The deadline to file any response or objection to the Oil and Gas Abandonment Motion shall be no later than \_\_\_\_\_, 2023, which is two (2) weeks prior to the scheduled hearing date.
4. All exhibits shall be exchanged amongst the respective parties by no later than \_\_\_\_\_, 2023, which is one (1) week prior to the scheduled hearing date.

Signed this \_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order or the Motion, as applicable.

Prepared and submitted by:

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