

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

)	
In re:)	Chapter 11
)	
8 North, LLC., ¹)	Case No. 20-11550 (TMH)
)	
Reorganized Debtors.)	(Formerly Jointly Administered under
)	Lead Case: Extraction Oil & Gas, Inc.
)	Case No. 20-11548 (CSS))
)	Related Docket No. 1840

**CERTIFICATION OF COUNSEL REGARDING REORGANIZED DEBTORS’
NINTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN
NO LIABILITY CLAIMS PURSUANT TO SECTION 502(b) OF THE
BANKRUPTCY CODE, BANKRUPTCY RULES 3003 AND 3007,
AND BANKRUPTCY LOCAL RULE 3007-1 AS TO PROOF OF CLAIM
FILED BY THF PRAIRIE CENTER DEVELOPMENT LLC (CLAIM NO. 1418)**

The undersigned co-counsel to the above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) hereby certifies as follows:

1. On March 16, 2021, the Reorganized Debtors filed the Reorganized Debtors’ Ninth Omnibus (Substantive) Objection to Certain No Liability Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Bankruptcy Local Rule 3007-1 [Docket No. 1840] (the “Objection”), which included an objection to proof of claim no. 1418 (“Claim No. 1418”), filed by THF Prairie Center Development LLC (“THF”).

2. The deadline to file a response to the Objection was March 30, 2021 (the “Response Deadline”).

¹ The last four digits of each Reorganized Debtors federal tax identification number, are: Extraction Oil & Gas, Inc. (3923); 7N, LLC (4912); 8 North, LLC (0904); Axis Exploration, LLC (8170); Extraction Finance Corp. (7117); Mountaintop Minerals, LLC (7256); Northwest Corridor Holdings, LLC (9353); Table Mountain Resources, LLC (5070); XOG Services, LLC (6915); and XTR Midstream, LLC (5624). The location of the Reorganized Debtors’ service address is: 370 17th Street, Suite 5200, Denver, Colorado 80202. On October 25, 2021, the Court entered an order [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (CSS).



3. Prior to the Response Deadline, counsel for THF asserted an informal response to the Objection (the “THF Response”) regarding Claim No. 1418.

4. On March 9, 2021 the Reorganized Debtors filed the *Certification Of Counsel Regarding Reorganized Debtors’ Ninth Omnibus (Substantive) Objection To Certain No Liability Claims Pursuant To Section 502(b) Of The Bankruptcy Code, Bankruptcy Rules 3003 And 3007, And Bankruptcy Local Rule 3007-1* [Docket No. 1900], pursuant to which counsel for the Reorganized Debtors submitted a revised proposed form of order sustaining the Objection and excluding Claim No. 1418, and advised the Court that the hearing on the Objection as it relates to Claim No. 1418 was continued to a future omnibus hearing.

5. On March 13, 2021, the Court entered the *Order Sustaining Reorganized Debtors’ Ninth Omnibus (Non-Substantive) Objection to Certain No Liability Claims Pursuant to Sections 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Bankruptcy Local Rule 3007-1* [Docket No. 1908], which did not include Claim No. 1418.

6. On May 27, 2021, counsel for THF advised counsel for the Reorganized Debtors that THF no longer contests the entry of an order sustaining the Objection as to Claim No. 1418.

7. Attached hereto as **Exhibit A** is a proposed form of order sustaining the Objection as to THF’s Claim No. 1418.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the proposed order at the earliest convenience of the Court.

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Dated: April 7, 2023
Wilmington, Delaware

/s/ Richard W. Riley

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² Whiteford, Taylor & Preston LLC operates as Whiteford Taylor & Preston L.L.P. in jurisdictions outside of Delaware.

EXHIBIT A

that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection as to the proof of claim filed by THF Prairie Center Development LLC (Claim No. 1418) is in the best interests of the Reorganized Debtors, their creditors, and other parties in interest; and this Court having found that the Reorganized Debtors' notice of the Objection and opportunity for a hearing on the Objection as to the proof of claim filed by THF Prairie Center Development LLC (Claim No. 1418) were appropriate and no other notice need be provided; and this Court having reviewed the Objection; and this Court having determined that the legal and factual bases set forth in the Objection as to the proof of claim filed by THF Prairie Center Development LLC (Claim No. 1418) establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Objection is **SUSTAINED** as to the proof of claim filed THF Prairie Center Development LLC (Claim No. 1418).

2. The Proof of Claim of THF Prairie Center Development LLC (Claim No. 1418) is hereby disallowed in its entirety.

3. KCC is authorized and directed to modify the claims register for these chapter 11 cases in accordance with the terms of this Order.

4. To the extent that the Objection does not comply in all respects with the requirements of Bankruptcy Local Rule 3007-1, the requirements of Bankruptcy Local Rule 3007-1 are waived.

5. The Court shall retain jurisdiction over the implementation, interpretation, and enforcement of this Order.