Docket #0017 Date Filed: 9/11/2020

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: EXTRACTION OIL & GAS, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 20-11548 (CSS) (Jointly Administered)
EXTRACTION OIL & GAS, INC., Plaintiff, v. REP PROCESSING LLC, Defendant.	Adversary Proceeding Adv. Pro. No. 20-50813 (CSS)

STIPULATION TO EXCEED THE PAGE LIMIT WITH RESPECT TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Extraction Oil & Gas, Inc. ("Plaintiff") and defendant REP Processing LLC ("Defendant" and together with Plaintiff, the "Parties") hereby stipulate and agree (the "Stipulation"), by and through undersigned counsel, as follows:

WHEREAS, on August 14, 2020, Plaintiff filed the *Complaint for Declaratory Judgment* (A.D.I. 1, 2) (the "Complaint") commencing the above-captioned adversary proceeding, Adv. Pro. No. 20-50813 (CSS) (the "Adversary Proceeding") against Defendant in the United States Bankruptcy Court for the District of Delaware (the "Court");

[1] The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtor's 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 Debtors' principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.

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WHEREAS, on August 14, 2020, Plaintiff filed *Plaintiff's Motion for Summary Judgment* and the opening brief in support thereof (A.D.I. 4, 5, 8) (together, the "Motion for Summary Judgment").

WHEREAS, on August 24, 2020, the Parties filed the stipulation (A.D.I. 9) to extend the time by when Defendant must respond to the Motion for Summary Judgment through and including September 18, 2020.

WHEREAS, rule 7007-2(a)(iv) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") provides that no opening or answering brief shall exceed thirty (30) pages and no reply shall exceed fifteen (15) pages in length, exclusive of any tables of contents and citations;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant, subject to the approval of the Court, as follows:

1. The page limit under Local Rule 7007-2(a)(iv) for Defendant's brief in response to the Motion for Summary Judgment shall be enlarged from thirty (30) to forty (40) pages.

2. The page limit under Local Rule 7007-2(a)(iv) for Plaintiff's reply brief in support of the Motion for Summary Judgment shall be enlarged from fifteen (15) to twenty-five (25) pages.

3. The Court shall, and hereby does, retain jurisdiction with respect to the enforcement, implementation and interpretation of this Stipulation.

Dated: September 11, 2020

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Dated: September 11, 2020

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Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: EXTRACTION OIL & GAS, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 20-11548 (CSS) (Jointly Administered)
EXTRACTION OIL & GAS, INC., Plaintiff, v. REP PROCESSING LLC, Defendant.	Adversary Proceeding Adv. Pro. No. 20-50813 (CSS)

ORDER APPROVING STIPULATION TO EXCEED THE PAGE LIMIT WITH RESPECT TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Upon consideration of the *Stipulation to Exceed the Page Limit with Respect to Plaintiff's Motion for Summary Judgment* (the "Stipulation"),[2] and the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determined that no further or other notice of the Stipulation need be given, except as provided for herein, it is hereby ORDERED that:

[1] The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtor's 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 Debtors' principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.

[2] Undefined terms used herein shall have the meanings ascribed to them in the Stipulation.

1. The Stipulation is approved.

2. The page limit under Local Rule 7007-2(a)(iv) for Defendant's brief in response to the Motion for Summary Judgment shall be enlarged from thirty (30) to forty (40) pages.

3. The page limit under Local Rule 7007-2(a)(iv) for Plaintiff's reply brief in support of the Motion for Summary Judgment shall be enlarged from fifteen (15) to twenty-five (25) pages.

4. The Court shall, and hereby does, retain jurisdiction with respect to the enforcement, implementation and interpretation of this Stipulation.

Dated: _____, 2020

_____
THE HONORABLE CHRISTOPHER S. SONTCHI
UNITED STATES BANKRUPTCY JUDGE