Docket #0044 Date Filed: 3/31/2021

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
EXTRACTION OIL & GAS, INC., *et al.*,[1]	)	Case No. 20-11548 (CSS)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	
	)	
	)	
ANNETTE LEAZER, *et al.*,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Adv. Proc. No. 20-50963 (CSS)
EXTRACTION OIL & GAS, INC.,	)	
	)	
Defendant.	)	

CERTIFICATION OF COUNSEL REGARDING SCHEDULING ORDER

I, Maria Aprile Sawczuk, of Goldstein & McClintock LLLP, counsel for Annette Leazer, *et al.* (collectively, the "*Plaintiffs*") in the above-captioned adversary proceeding, hereby certify as follows:

1. Pursuant to the Court's ruling on March 23, 2021, counsel for the Plaintiffs and counsel for defendant, Extraction Oil & Gas, Inc. ("*Extraction*" and together with Plaintiff, the "*Parties*") have agreed upon a form of proposed Scheduling Order (the "*Proposed Order*"),

[1] The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each 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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which is attached hereto as **Exhibit A**, to govern discovery in the above-captioned adversary proceeding.

2. The Parties respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: March 31, 2021

Respectfully submitted,

/s/ Maria Aprile Sawczuk

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Counsel for Plaintiffs

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
EXTRACTION OIL & GAS, INC., *et al.*,[1]	)	Case No. 20-11548 (CSS)
Reorganized Debtors.	)	(Jointly Administered)
ANNETTE LEAZER, *et al.*,	)	
Plaintiffs,	)	
v.	)	Adversary Proceeding Adv. Proc. No. 20-50963 (CSS)
EXTRACTION OIL & GAS, INC.,	)	
Defendant.	)	

SCHEDULING ORDER

To promote the efficient and expeditious disposition of the above-captioned adversary proceeding, the following schedule shall apply to the above-captioned adversary proceeding.

IT IS HEREBY ORDERED that:

1. The discovery planning conference described in Fed. R. Civ. P. 26(f), made applicable by Fed. R. Bankr. P. 7026, shall take place no later than **April 16, 2021**.

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

2. The parties shall provide the initial disclosures under Fed. R. Civ. P. 26(a)(1) no later than **April 30, 2021**. Any extension of the deadline to provide initial disclosures must be by Order of the Court and will only be granted for good cause shown.

3. All fact discovery shall be completed by **November 5, 2021**.

4. The parties shall provide expert reports for any issue on which they bear the burden of proof, by **August 27, 2021**. The parties shall provide any expert report intended to rebut any expert report by **October 8, 2021**. All reports shall provide the information required by Fed. R. Civ. P. 26(a)(2)(B).

5. All expert discovery shall be completed, and discovery shall close, by **November 30, 2021**.

6. Deadlines contained in this Scheduling Order may be extended only by order of the Court, and only upon written motion for good cause shown.

7. Counsel for the Plaintiffs shall serve this Scheduling Order on the Defendant within five (5) business days after the entry of this Order.