Docket #0011 Date Filed: 1/26/2026

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
SHANNON WIND, LLC,	Case No. 26-90124 (ARP)
Debtor. [1]	(Emergency Hearing Requested)

DEBTOR'S EMERGENCY
MOTION FOR ENTRY OF AN ORDER EXTENDING
TIME TO FILE SCHEDULES AND GRANTING RELATED RELIEF

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN 3:00 P.M. (PREVAILING CENTRAL TIME) ON JANUARY 28, 2026.

IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST APPEAR AT THE HEARING IF ONE IS SET, OR FILE A WRITTEN RESPONSE PRIOR TO THE DATE THAT RELIEF IS REQUESTED IN THE PRECEDING PARAGRAPH. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JANUARY 28, 2026, AT 3:00 P.M. (PREVAILING CENTRAL TIME) IN COURTROOM 400, 4TH FLOOR, 515 RUSK STREET, HOUSTON, TEXAS 77002. PARTICIPATION AT THE HEARING WILL ONLY BE PERMITTED BY AN AUDIO AND VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE PÉREZ'S CONFERENCE ROOM NUMBER IS 282694. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE PÉREZ'S HOMEPAGE. CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE PÉREZ'S HOMEPAGE.

[1] The last four digits of the Debtor's federal tax identification number are 3562. For the purpose of this chapter 11 case, the Debtor's address is 1920 McKinney Ave, Suite 950, Dallas, TX, 75201. Additional information regarding the Debtor's case can be found on the website of the Debtor's proposed claims and noticing agent at https://www.veritaglobal.net/shannon.

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SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

Shannon Wind, LLC, as debtor and debtor in possession in the above-captioned chapter 11 case (the "**Debtor**"), respectfully represents as follows:

RELIEF REQUESTED

1. The Debtor requests entry of an order, substantially in the form attached hereto (the "**Proposed Order**"), (a) extending the deadline by which the Debtor must file its schedules of assets and liabilities and statement of financial affairs (collectively, the "**Schedules and Statement**"), through and including March 12, 2026, without prejudice to the Debtor's ability to seek further extensions of such deadline and granting related relief.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "**Court**") has jurisdiction over this matter under 28 U.S.C. § 1334 and the *Order of Reference to Bankruptcy Judges* from the United States District Court for the Southern District of Texas, entered May 24, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The Debtor confirms its consent, pursuant to Bankruptcy Rule 7008, to the Court's entry of a final order by the Court in connection with this Motion.

3. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

4. The statutory predicates for the relief requested herein are sections 105(a) and 521(a)(1)(B) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "**Bankruptcy Code**"), rules 1007(c) and 9006 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Local Rule 9013-1(b), and the *Procedures for Complex Cases in the Southern District of Texas*.

BACKGROUND

5. On January 25, 2026, (the "**Petition Date**") Shannon Wind, LLC commenced the above-styled voluntary case under chapter 11 of title 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this Chapter 11 Case.

6. Additional information regarding the Debtor's business and capital structure and the circumstances leading to the commencement of this Chapter 11 Case is set forth in the *Declaration of John Shepherd in Support of Debtor's Chapter 11 Petition and First Day Relief* (the "**First Day Declaration**"),[2] filed contemporaneously herewith and incorporated herein by reference.

BASIS FOR RELIEF

I. Cause Exists to Extend Time to File the Schedules and Statement.

7. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) ordinarily require that the Debtor file the Schedules and Statement within fourteen days of the Petition Date (the "**Current Schedule Deadline**"). However, pursuant to Bankruptcy Rules 1007(a)(5), 1007(c), and 9006(b), the Court has authority to further extend the time required for filing the Schedules and Statement "for cause." Fed. R. Bankr. P. 1007 and 9006(b). Demonstrating "cause" merely requires that a debtor "demonstrate some justification for the issuance of the order," and bankruptcy courts will normally grant such extensions "in the absence of bad faith or prejudice to the adverse party." *Bryant v. Smith*, 165 B.R. 176, 182 (W.D. Va. 1994) (discussing the standard

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

for granting extensions under Bankruptcy Rule 1007) (internal citations and quotation marks omitted). Here, the Debtor respectfully submits that good and sufficient cause exists to extend the Current Schedules Deadline as requested herein, based on the nature of the Debtor's business and the numerous burdens imposed by the Debtor's chapter 11 efforts, particularly in the early days of this Chapter 11 Case.

8. In the ordinary course of business, the Debtor relies on a small number of critical vendors to provide the Debtor with essential services, to operate the Project assets, and deliver produced power to the market. To prepare its Schedules and Statement, the Debtor and its advisors, will have to expend significant time and effort working with the Debtor's critical vendor,Consolidated Asset Management Services ("**CAMS**"), who manages the Debtor's assets on a day-to-day basis and who will have to synthesize financial information from books, records, and documents relating to Debtor's creditors, assets, leases, customer contracts, vendor agreements, and other contracts. The time-consuming nature of such task—coupled with the Debtor's transition into chapter 11—supports an extension of the deadline set forth in the Bankruptcy Code and Bankruptcy Rules for filing the Schedules and Statement.

9. Allowing the Debtor to focus its attention on stabilizing its operations at the outset of this Chapter 11 Case will provide a substantial benefit to the Debtor's business, the estate, and all parties in interest. The relief requested herein will not prejudice or adversely affect the rights of the Debtor's creditors or other parties in interest. Rather, the deadline extension will aid the Debtor's efforts to ensure the accuracy and completeness of the Schedules and Statement, which, in turn, will promote the efficient administration of this Chapter 11 Case. Additionally, even under the extended deadline, the Debtor will file the Schedules and Statement in advance of any deadline for filing proofs of claim in this Chapter 11 Case.

10. As explained above and in the First Day Declaration, the Debtor relies on CAMS to maintain the Debtor's operations and to support in the preparation of the Schedules and Statement. To do so accurately and in appropriate detail will require significant attention from the Debtor's CRO and advisors in collaboration with CAMS. The Debtor, therefore, requests that the Court extend the deadline for the Debtor to file the Schedules and Statement by an additional forty-five days, through and including March 12, 2026, without prejudice to the Debtor's right to request further extension for cause shown.

EMERGENCY CONSIDERATION

11. Pursuant to Local Rule 9013-1, the Debtor requests emergency consideration of this Motion. Immediate and irreparable harm exists where the absence of relief would impair a debtor's ability to reorganize or threaten the debtor's future as a going concern. *See In re Ames Dep't Stores, Inc.*, 115 B.R. 34, 36 n.2 (Bankr. S.D.N.Y. 1990) (discussing the elements of "immediate and irreparable harm" in relation to Bankruptcy Rule 4001). For the reasons discussed above and in the First Day Declaration, an immediate and orderly transition into chapter 11 is critical to the viability of the Debtor's operations. The requested relief is necessary for the Debtor to operate its business in the ordinary course, preserve the ongoing value of its operation, and maximize the value of the estate for the benefit of all stakeholders. The Debtor has demonstrated that the requested relief "is needed to avoid immediate and irreparable harm" and, as a result, the Debtor requests that the Court approve the relief requested in this Motion on an emergency basis.

NOTICE

12. Notice of this Motion has been or will be provided to: (a) counsel for the U.S. Trustee; (b) counsel for the United States District Attorney's Office for the Southern District of Texas; (c) those creditors holding the twenty largest unsecured claims against the Debtor's estate;

(d) Claimant Firms[3]; (e) counsel to Citigroup Energy Inc. and Citbank, N.A., Attn: Jennifer Hardy (JHardy2@willkie.com); (f) Lotus Infrastructure Partners; (g) Berkshire Hathaway Energy; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PREVIOUS REQUEST

13. No previous request for the relief sought herein has been made by the Debtor to this or any other court.

[*Remainder of page intentionally blank*]

[3] As defined in the *Debtor's Emergency Motion for an Order (I) Approving Notice Procedures for Litigation Claimants; and (II) Approving Form and Notice of Commencement of this Case* filed contemporaneously with this motion.

WHEREFORE, the Debtor respectfully requests that the Court enter the Proposed Order and grant such other and further relief as may be just and proper.

Houston, Texas
Dated: January 26, 2026

/s/ Jarrod B. Martin

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Proposed Counsel to the Debtor and Debtor in Possession

CERTIFICATE OF ACCURACY

In accordance with Local Rule 9013-1(i), I hereby certify that the foregoing statements regarding the nature of the emergency with respect to the Debtor are true and accurate to the best of my knowledge.

/s/ *Jarrod B. Martin*
Jarrod B. Martin

CERTIFICATE OF SERVICE

I certify that on the date hereof, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Jarrod B. Martin*
Jarrod B. Martin

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
SHANNON WIND, LLC,	Case No. 26-90124 (ARP)
Debtor.[1]	

ORDER EXTENDING DEBTOR'S TIME TO FILE SCHEDULES AND GRANTING RELATED RELIEF

Upon consideration of the emergency motion (the "**Motion**")[2] of the Debtor and Debtor in Possession in the above-captioned case (the "**Debtor**") for entry of an order (a) extending the deadline by which the Debtor must file its schedules of assets and liabilities and statement of financial affairs (collectively, the "**Schedules and Statement**"), without prejudice to the Debtor's right to seek further extensions of such deadline; and granting related relief, as more fully set forth in the Motion; and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b), and the *Order of Reference to Bankruptcy Judges* from the United States District Court for the Southern District of Texas, entered May 24, 2012; and this Court having found that venue of this Chapter 11 Case and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that notice of the Motion has been given as set forth in the Motion and that such notice is adequate and no other or further notice need be given; and

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[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

this Court having determined that it may enter an order consistent with Article III of the United States Constitution; and upon consideration of the First Day Declaration; and upon the record in this Chapter 11 Case and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interest of the Debtor, the estate, and its creditors; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The time within which the Debtor must file its Schedules and Statement is extended through and including March 12, 2026 (the "**Extended Schedules and Statement Deadline**"), without prejudice to the Debtor's right to seek a further extension of the Extended Schedules and Statement Deadline. The Debtor may obtain further extensions to file its Schedules and Statement by agreement with the U.S. Trustee (with a note of such extension filed on the docket) without the need for further order from this Court.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules, the Local Rules, and the *Procedures for Complex Cases in the Southern District of Texas* are satisfied by such notice.

5. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

6. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2026

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ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE