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]	

DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I) EXTENDING THE EXCLUSIVITY PERIODS PURSUANT TO SECTION 1121 OF THE BANKRUPTCY CODE AND (II) GRANTING RELATED RELIEF

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this Motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Shannon Wind, LLC (the "**Debtor**") respectfully represents as follows in support of this motion (this "**Motion**"):

RELIEF REQUESTED

1. The Debtor seeks entry of an order, substantially in the form attached hereto (the "**Proposed Order**"), (a) extending the period during which the Debtor has the exclusive right to (i) file a chapter 11 plan through and including August 24, 2026 (the "**Filing Exclusivity Period**") and (ii) solicit a chapter 11 plan filed during the Filing Exclusivity Period through and including October 23, 2026 (the "**Solicitation Exclusivity Period**" and, together with the Filing

[1] The last four digits of the Debtor's financial 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 claims and noticing agent at https://www.veritaglobal.net/Shannon (the "**Claims Agent Website**").

Exclusivity Period, the "**Exclusivity Periods**"), without prejudice to the rights of the Debtor to seek further extensions of the Exclusivity Periods, and (b) granting related relief. Absent the relief requested, the Filing Exclusivity Period would expire on May 26, 2026, and the Solicitation Exclusivity Period would expire on July 27, 2026. [2]

PRELIMINARY STATEMENT

2. The Debtor requests that this Court grant a 90-day extension of the Exclusivity Periods. The Debtor commenced this chapter 11 case in January 2026 to effectuate a going-concern sale of the 204.1-megawatt wind farm in Clay County, Texas to the highest and best bidder and subsequently pursue confirmation of a plan.

3. To date, the Debtor has achieved several meaningful milestones to cement a sale free and clear of all claims against the Debtor and its assets, thereby maximizing value for all stakeholders. As of the filing of this Motion, the Debtor has obtained Court approval for bidding procedures to effectuate the above-described sale (the "**Bidding Procedures Order**"). ECF No. 66.

4. In keeping with the Bidding Procedures Order, the Debtor designated 1370 Clean Energy LLC (or its designated affiliate) as the stalking horse bidder for the sale of substantially all of the Debtor's assets on April 30, 2026. ECF No. 146. There were no competing qualified bids and the Debtor filed notice of its designation of the stalking horse bidder as the successful bidder on May 15, 2026 and cancelled the auction. ECF No. 184.

[2] The Filing Exclusivity Period is currently scheduled to end on May 26, 2026, and the Solicitation Exclusivity Period is currently scheduled to end on July 27, 2026. Pursuant to section K of the Complex Rules, the filing of this Motion automatically extends the Filing Exclusivity Period until this Court rules on this Motion. See Complex Rules section K (providing that, unless otherwise provided by applicable law, a motion to extend the time for taking an action prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Local Rules for the Southern District of Texas (the "**Local Rules**"), or a confirmed plan, shall automatically extend the time for taking such action until the bankruptcy court rules on such motion).

5. On April 22, 2026, the Court entered the *Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation Procedures and Solicitation Packages, (III) Scheduling a Combined Hearing, (IV) Establishing Procedures for Objecting to the Plan, (V) Approving the Form, Manner, and Sufficiency of Notice of the Combined Hearing, and (VI) Granting Related Relief* [ECF No. 138]. The Court conditionally approved the Disclosure Statement in the Debtor's *Amended Combined Disclosure Statement and Chapter 11 Plan* [ECF No. 141] (as it may be further amended or revised, the "**Combined Disclosure Statement and Plan**") and set a combined hearing on the Disclosure Statement and Plan on June 3, 2026.[3] The Debtor has distributed the Combined Disclosure Statement and Plan and solicitation packages and the voting and objection deadline is May 27, 2026 at 4:00 p.m.

6. The Debtor has also undertaken several other efforts to effectuate the sale to the Successful Bidder consistent with the Plan, including:

- ***"First Day" and "Second Day" Relief.*** Obtained important procedural and operational relief in the form of "first day" and "second day" relief, which has helped stabilize and minimize disruption to the Debtor's business and relationships with their stakeholders following the commencement of this chapter 11 case.

- ***Stakeholder Engagement.*** Engaged in constructive and good faith discussions with stakeholders to address numerous questions, concerns, and issues raised by the Debtor's vendors, contract counterparties, employees, landowners, and other parties in interest.

- ***Meeting of Creditors.*** Participated in the meeting of creditors pursuant to section 341 of the Bankruptcy Code.

- ***Bar Date Order.*** Filed the *Debtor's Motion for Entry of an Order (I) Updating Deadlines for the Filing of Proofs of Claim, Including Requests for Payment under Section 503(B)(9); (II) Approving the Form and Manner for Filing Proofs of Claim; (III) Approving the Form and Manner of Notice Thereof, Including Section 503(b)(9) Requests, and (IV) Granting Related Relief* [ECF No. 78]; subsequently obtained court approval of the same [ECF No. 123],

[3] Unless otherwise defined, all capitalized terms shall have the meanings provided in the Combined Disclosure Statement and Plan.

thereby facilitating the timely administration of their claims pool; and began the process of reconciling claims and interests as promptly and efficiently as possible.

- ***Statutory Reporting.*** Coordinated with the U.S. Trustee to provide requested information on a variety of issues and complied with all reporting requirements under the Bankruptcy Code, including preparing and filing monthly operating reports.

- ***Hearings.*** Prepared for and attended various hearings, including the first day hearing and second day hearing.

- ***Retention of Professionals.*** Prepared and filed retention applications for the Debtor's professionals, including Kurtzman Carson Consultants LLC dba Verita Global [ECF No. 4], Accordion Partners, LLC [Docket No. 72], Bradley Arant Boult Cummings LLP [ECF No. 76], and Nomura Securities International, Inc. [ECF No. 79].

7. This chapter 11 case is moving toward resolution through the path outlined by Combined Disclosure Statement and Plan and supported by the Debtor's accomplishments thus far. Accordingly, allowing another party to propose an alternate plan would be neither efficient nor appropriate at this point in this chapter 11 case.

8. In light of the foregoing, the Debtor requests a 90-day extension of the Exclusivity Periods to solicit approval of its Plan so that it may continue to diligently pursue and effectuate a comprehensive resolution to this chapter 11 case. Based on the current posture of this chapter 11 case, as well as the size and complexity of its business, the Debtor believes sufficient cause exists to warrant an extension of the Exclusivity Periods. An extension of the Exclusivity Periods is in the best interests of the Debtor, its estate, and all stakeholders as it will allow the Debtor to procure the best recoveries for its creditors and help to ensure a successful conclusion to this chapter 11 case. For all the foregoing reasons and those set forth below, the Debtor respectfully submits that a 90-day extension of exclusivity is appropriate in these circumstances and requests that the Court approve an extension of the Exclusivity Periods.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this matter pursuant to 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 (the "**Court**"), dated May 24, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Debtor confirms its consent to entry of a final order in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

10. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

11. The statutory and legal predicates for the relief requested herein are section 1121 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "**Bankruptcy Code**") and rule 9006 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and the *Procedures for Complex Cases in the Southern District of Texas* (the "**Complex Rules**").

BACKGROUND

12. On January 25, 2026 (the "**Petition Date**"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the "**Chapter 11 Case**"). The Debtor is operating its business and managing its properties as debtor and 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.

13. Additional information regarding the Debtor's business, capital structure, and the circumstances leading to the filing of this Chapter 11 Case is set forth in the *Declaration of John Shepherd in Support of Chapter 11 Petition and First Day Motions* (the "**First Day Declaration**"), which was filed on January 26, 2026, and is incorporated herein by reference. ECF No. 14.

BASIS FOR RELIEF

14. Section 1121(b) of the Bankruptcy Code establishes an initial 120-day period following the commencement of a case during which a debtor has the exclusive right to file a chapter 11 plan. *See* 11 U.S.C. § 1121(b). Additionally, section 1121(c) of the Bankruptcy Code provides that if a debtor files a plan within the 120-day exclusive filing period, it has an initial 180-day period from the petition date to obtain acceptance of its plan. *See* 11 U.S.C. § 1121(c)(3).

15. Pursuant to section 1121(d) of the Bankruptcy Code, the Court may extend the exclusivity periods for "cause" up to 18 months and 20 months after the petition date for the filing exclusivity period and the solicitation exclusivity period, respectively. *See* 11 U.S.C. § 1121(d). Although the Bankruptcy Code neither defines the term "cause" nor establishes formal criteria for an extension, the legislative history of section 1121 of the Bankruptcy Code indicates that "cause" should be viewed flexibly "in order to allow the debtor to reach an agreement." *See* H.R. Rep. No. 95-595, at 231-32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5963 (noting that Congress intended to give Bankruptcy Courts great flexibility to protect a debtor's interests by allowing a debtor an unimpeded opportunity to negotiate settlement of debts without interference from other parties in interest). Courts routinely rely on the legislative history behind § 1121 of the Bankruptcy Code when determining the meaning of "cause" thereunder. *See In re Timbers of Inwood Forest Assocs., Ltd.*, 808 F.2d 363, 372 (5th Cir. 1987), *aff'd sub nom. United Sav. Ass'n of Texas v. Timbers of Inwood Forest Associates, Ltd.*, 484 U.S. 365 (1988) ("[A]ny bankruptcy court involved in an assessment of whether 'cause' exists should be mindful of the legislative goal behind § 1121."); *In re Mirant Corp.*, No. 4-04-CV-476-A, 2004 WL 2250986, at *2 (N.D. Tex. Sept. 30, 2004) ("In virtually every case where an extension has been granted, the debtor showed substantial progress had been made in negotiations toward reorganization.").

16. Courts within the Fifth Circuit and in other jurisdictions have held that the decision to extend the Exclusivity Periods is left to the sound discretion of a bankruptcy court and should be based on the totality of circumstances in each case. *See id.* at *2 (noting that the decision to extend exclusivity "lies within the bankruptcy court's discretion"). In particular, courts examine a number of factors to determine whether a debtor has had an adequate opportunity to develop, negotiate, and propose a chapter 11 plan and thus whether there is "cause" for extension of the Exclusivity Periods. These factors include:

(i) the size and complexity of the case;

(ii) the necessity for sufficient time to permit the debtor to negotiate a plan of reorganization and prepare adequate information;

(iii) the existence of good faith progress toward reorganization;

(iv) the fact that the debtor is paying its bills as they become due;

(v) whether the debtor has demonstrated reasonable prospects for filing a viable plan;

(vi) whether the debtor has made progress in negotiations with its creditors;

(vii) the amount of time which has elapsed in the case;

(viii) whether the debtor is seeking an extension of exclusivity in order to pressure creditors to submit to the debtor's reorganization demands; and

(ix) whether an unresolved contingency exists.

See, e.g., In re New Millennium Mgmt., LLC, No. 13-35719-H3-11, 2014 WL 792115, at *6 (Bankr. S.D. Tex. Feb. 25, 2014); *In re Adelphia Commc'ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006) (identifying the above factors and noting that "courts historically have considered [the same factors] in making determinations of this character").

17. Not all factors are relevant to every case, and the existence of even one of the above-listed factors may be sufficient to extend a debtor's exclusivity periods. *See e.g., In re Express*

One Int'l, Inc., 194 B.R. 98, 100-01 (Bankr. E.D. Tex. 1996) (listing all nine factors later set forth in *Adelphia* but determining "cause" to extend exclusivity existed without finding that every factor was met); *In re Hoffinger Indus., Inc.*, 292 B.R. 639, 644 (B.A.P. 8th Cir. 2003) ("It is within the discretion of the bankruptcy court to decide which factors are relevant and give the appropriate weight to each."); *see also In re Excel Maritime Carriers Ltd.*, 2013 WL 5155040, at *2 (Bankr. S.D.N.Y. Sept. 13, 2013) (noting that the ultimate consideration, in an exclusivity termination context, for the court is what will best move the case forward in the best interests of all parties). Application of the relevant above factors to the facts of this Chapter 11 Case demonstrates that the Debtor's requested extension is warranted under the facts and circumstances of this case.

I. The Debtor's Chapter 11 Case is Large and Complex.

18. There is no question that this Chapter 11 Case is large and extremely complex. As indicated in the *Notice of Designation as Complex Case*, the Debtor has a total debt of more than $110 million, and numerous parties in interest in the Chapter 11 Case. ECF No. 3.

19. Accordingly, the Debtor submits that the size, complexity, and the breadth of financial and legal issues involved in this Chapter 11 case weigh in favor of extending the Exclusivity Periods.

II. The Debtor Has Made Substantial Progress in Negotiating in Good Faith with Creditors and Administering this Chapter 11 Case.

20. Since the Petition Date, the Debtor has made substantial progress in negotiating with its respective stakeholders and administering this Chapter 11 Case. Specifically, among other achievements, the Debtor has: (a) obtained first-day and second-day relief; (b) filed numerous retention applications and obtained orders retaining their professionals; (c) filed its schedules of assets and liabilities and statements of financial affairs; (d) participated in a meeting of creditors pursuant to section 341 of the Bankruptcy Code; (e) established claims bar dates; (f) filed the

Combined Disclosure Statement and Plan, and received conditional approval of the Disclosure Statement; (g) commenced solicitation of the Plan; and (h) established bidding procedures and designated a Successful Bidder for the purchase of its assets.

21. Notwithstanding the Debtor's material developments and substantial progress since the Petition Date, the administration of this Chapter 11 Case as well as the confirmation and implementation of the Plan will require additional time and effort. Accordingly, such circumstances support granting the Debtor's requested extension of the Exclusivity Periods.

III. Other Factors Weigh in Favor of Granting an Extension of the Exclusivity Periods.

22. ***The Debtor Is Paying Its Bills As They Come Due.*** Since the Petition Date, the Debtor has actively monitored its liquidity position and has paid its vendors, utility providers, and contract counterparties in the ordinary course of business or as otherwise provided by orders of this Court.

23. ***The Debtor Is Not Requesting An Extension Of The Exclusivity Periods To Pressure Creditors.*** The Debtor is working towards confirmation of the Plan, which maximizes the value of the Debtor's estate for all stakeholders. The Debtor has engaged with key stakeholders regarding a variety of issues in this Chapter 11 Case and is not seeking an extension of the Exclusivity Periods as a tactic to exert pressure on their creditors. Rather, the Debtor, in good faith, requests an extension of the Exclusivity Periods to provide a sufficient, flexible window in which to conclude the orderly and efficient chapter 11 process, including by continuing negotiations with creditors to confirm the Plan to successfully exit this Chapter 11 Case without the disruption and distraction that would otherwise be created by competing chapter 11 plan proposals.

24. ***An Extension Of The Exclusivity Periods Will Not Prejudice Creditors.*** The Debtor seeks to preserve exclusivity to ensure that parties with competing interests do not obstruct its efforts to confirm a plan that maximizes value for all interested parties. Extending the Exclusivity Periods will benefit all creditors by avoiding the significant expenditure of time and resources that inevitably results when multiple parties with potentially diverging interests vie for the consideration of their own respective plans.

25. ***Relatively Little Time Has Elapsed In This Chapter 11 Case.*** Approximately four months have elapsed since the Petition Date, and this is the Debtor's first request for an extension of the Exclusivity Periods. As noted above, during the brief pendency of this Chapter 11 Case, the Debtor made significant progress towards a sale of substantially all of its assets and confirmation of the Plan.

26. Moreover, courts tend to grant a debtor's first request for an extension of the debtor's exclusive period to file a chapter 11 plan. *See In re Apex Pharm., Inc.*, 203 B.R. 432, 441 (N.D. Ind. 1996) (noting that during the initial 120-day period in which Debtor have an exclusive right to file a chapter 11 plan, "bankruptcy courts apply a lesser standard in determining whether the burden of showing 'a reasonable possibility of a successful reorganization within a reasonable time' has been satisfied.") (quoting 11 U.S.C. § 1121(b), (c)(2)); *see also In re Borders Grp., Inc.*, 460 B.R. 818, 825 (Bankr. S.D.N.Y. 2011) (same).

27. The Debtor is progressing substantially along the currently proposed timeline and expects to have approval of the sale of substantially all the Debtor's assets and confirmation of the Plan in the coming weeks. Considering the resources of the Debtor's estate that have already been spent on preparing and commencing solicitation of the Plan, the filing of a competing plan or plans during this time would force the Debtor to fend off alternative chapter 11 plan proposals instead

of focusing its efforts on maximizing the recovery of all stakeholders. Accordingly, the Debtor files this motion out of an abundance of caution and requests a 90-day extension of each of the Exclusivity Periods to ensure no alternative plan is filed.

28. For the foregoing reasons, the Debtor submits that the relief requested herein is essential, appropriate, and in the best interests of the Debtor's estate and stakeholders.

NOTICE

29. Notice of this Motion has been or will be provided to: (a) the U.S. Trustee; (b) the United States Attorney's Office for the Southern District of Texas; (c) those creditors holding the twenty largest unsecured claims against the Debtor's estate; (d) counsel to the Prepetition Secured Parties; and (e) all parties who have requested notice in the Chapter 11 Case as listed on the most recent Master Service List filed with the Court. In light of the nature of the relief requested herein, the Debtor submits that no other or further notice is necessary.

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CONCLUSION

WHEREFORE, the Debtor requests that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: May 22, 2026
Houston, Texas

Respectfully submitted,

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Counsel to Shannon Wind, LLC

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. Additionally, the foregoing document will be served as set forth in a forthcoming affidavit filed by the Debtor's Claims and Noticing Agent.

/s/ James B. Bailey
James B. Bailey

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 (I) EXTENDING THE EXCLUSIVITY PERIODS PURSUANT TO SECTION 1121 OF THE BANKRUPTCY CODE AND (II) GRANTING RELATED RELIEF

Upon consideration of the motion (the "**Motion**")[2] of the Debtor in the above-captioned chapter 11 case (the "**Debtor**"), for the entry of an order (this "**Order**"), (i) pursuant to section 1121 of the Bankruptcy Code, (a) extending the period during which the Debtor have the exclusive right to file a chapter 11 plan through and including August 24, 2026 (the "**Filing Exclusivity Period**") and (b) extending the period during which the Debtor have the exclusive right to solicit acceptances of a plan of reorganization filed during the Filing Exclusivity Period through and including October 23, 2026 (the "**Solicitation Exclusivity Period**" and, together with the Filing Exclusivity Period, the "**Exclusivity Periods**") and (ii) granting related relief, all as more fully described in the Motion and upon the First Day Declaration; and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 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

[1] The last four digits of the Debtor's financial 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 claims and noticing agent at https://www.veritaglobal.net/Shannon (the "**Claims Agent Website**").

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

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 determined that it may enter an order consistent with Article III of the United States Constitution; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "**Hearing**"), if any; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if any, establish just cause for the relief granted herein; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtor, its estate, and its creditors; and that the legal and factual bases set forth in the Motion establish cause for the relief granted herein; and upon the record in this Chapter 11 Case and all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT**:

1. The Filing Exclusivity Period is extended through and including August 24, 2026.

2. The Solicitation Exclusivity Period is extended through and including October 23, 2026.

3. Entry of this Order is without prejudice to the Debtor's right to seek from this Court such additional and further extensions of the Exclusivity Periods within which to file and solicit acceptance of a chapter 11 plan as may be necessary or appropriate and is without prejudice to any other party's right to (a) object to any such further requested extension or (b) seek to terminate any Exclusivity Period (other than the Exclusivity Periods extended pursuant to this Order).

4. Notwithstanding anything to the contrary in the Complex Rules, upon the filing of any motion requesting a further extension of the Filing Exclusivity Period that is filed on or before August 24, 2026 and upon the filing of any motion requesting a further extension of the Solicitation

Exclusivity Period that is filed on or before October 23, 2026, the deadline for the Debtor's Exclusivity Periods shall be deemed automatically extended through and including the date that the Court issues an order disposing of such request for further extension of the Exclusivity Periods.

5. This Order shall be binding on the Debtor, including any chapter 7 or chapter 11 trustee or other fiduciary appointed for the estate of the Debtor.

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

7. 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 Complex Rules are satisfied by such notice.

8. Any Bankruptcy Rule that might otherwise delay the effectiveness of this Order is hereby waived, and the terms and conditions of this Order shall be effective and enforceable immediately upon its entry.

9. The Debtor is authorized to take any action necessary or appropriate to implement and effectuate the terms of, and the relief granted in, this Order without seeking further order of the Court.

10. The Court shall retain exclusive jurisdiction over any matter arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2026
Houston, Texas

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE