Docket #0038 Date Filed: 01/30/2026

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

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

DEBTOR'S NOTICE OF HEARING TO CONSIDER FINAL APPROVAL OF RELIEF SOUGHT IN CERTAIN FIRST DAY MOTIONS

PLEASE TAKE NOTICE that, on January 25, 2026, the debtor and debtor in possession in the above-captioned case (the "Debtor") commenced a case under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court").

PLEASE TAKE FURTHER NOTICE that, on January 26, 2026, the Debtor filed, among other things, the following motions seeking interim and final orders for relief:

A. *Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing Debtor to (A) Maintain its Cash Management System and (B) Honor Certain Prepetition Obligations Related Thereto; (II) Waiving Certain Operating Guidelines; (III) Suspending Time to Comply with Section 345(b) of the Bankruptcy Code; and (IV) Granting Related Relief* [ECF No. 8] (the "Cash Management Motion")

B. *Debtor's Emergency for Interim and Final Orders (I) Authorizing Debtor to Pay (A) Critical Vendor Claims and (B) Lien Claims; and (II) Granting Related Relief* [ECF No. 9] (the "Critical Vendor Motion")

C. *Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Policies and (B) Pay All Obligations with Respect Thereto; and (II) Granting Related Relief* [ECF No. 10] (the "Insurance Motion")

D. *Emergency Motion of Debtor for Order (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [*ECF No. 12] (the "Utilities Motion")

[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 claims and noticing agent at https://www.veritaglobal.net/shannon.

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E. *Emergency Motion of Debtor for Interim and Final Orders (I) Authorizing Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties; and (III) Granting Related Relief* [ECF No. 15] (the "Cash Collateral Motion")

PLEASE TAKE FURTHER NOTICE that, following the hearing held on January 28, 2026 on the above referenced motions, the Court entered the following orders granting the interim relief requested therein:

1. *Interim Order (I) Authorizing Debtor to Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties; and (III) Granting Related Relief* [ECF No. 29]

2. *Interim Order (I) Authorizing Debtor to (A) Continue to Maintain its Cash Management System, and (B) Honor Certain Prepetition Obligations Related Thereto; (II) Waiving Certain Operating Guidelines; (III) Suspending Time to Comply with Section 345(b) of the Bankruptcy Code; and (IV) Granting Related Relief* [ECF No. 30]

3. *Interim Order (I) Authorizing Debtor to Pay (A) Critical Vendor Claims and (B) Lien Claims; and (II) Granting Related Relief* [ECF No. 31]

4. *Order Granting Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Policies and (B) Pay All Obligations with Respect Thereto; and (II) Granting Related Relief* [ECF No. 32]

5. *Order (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief* [ECF No. 33][2]

PLEASE TAKE FURTHER NOTICE that the Court scheduled a hearing for **February 18, 2026 at 1:00 p.m.** (prevailing Central Time), (the "Final Hearing") to consider entry of a final order granting the relief sought in the above referenced motions.

PLEASE TAKE FURTHER NOTICE that **participation in the Final Hearing will be permitted by both in-person attendance or by audio and video connection**. In-person attendance will be at the United States Bankruptcy Court for the Southern District of Texas, Houston Division, Courtroom 400, 515 Rusk Street, Houston, Texas 77002. 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

[2] If no objections are timely filed and served upon the Utility Notice Parties (as defined in the Utilities Motion), the Court will not conduct a further hearing on the Utilities Motion, except nothing herein shall limit or preclude the right of any party to seek such a Determination Hearing (as defined in the Utilities Motion) in accordance with the procedures set forth therein..

homepage. The meeting code is "JudgePerez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

PLEASE TAKE FURTHER NOTICE that hearing appearances must be made electronically in advance of the First Day Hearing. To make your appearance, click the "Electronic Appearance" link on Judge Pérez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

PLEASE TAKE FURTHER NOTICE that, any party-in-interest objecting to the relief sought at the Final Hearing with respect to the above reference motions shall file and serve a written objection (via mail and e-mail) **on or before February 11, 2026** upon the following respective parties:

- **Cash Collateral Motion.** (a) proposed counsel to the Debtor, Bradley Arant Boult Cummings LLP, 600 Travis Street, Suite 5600, Houston, TX 77002, Attn: Jarrod Martin (jbmartin@bradley.com), Michael Riordan (mriordan@bradley.com) and James Bailey (jbailey@ bradley.com); and (b) counsel to the Prepetition Secured Parties, Willkie Farr & Gallagher LLP, 600 Travis Street, Suite 2100, Houston, TX 77002, Attn: Jennifer Hardy (jhardy2@willkie.com).

- **Cash Management Motion.** (a) proposed counsel for the Debtor, Bradley Arant Boult Cummings LLP, 600 Travis Street, Suite 5600, Houston, Texas 77060, Attn: Jarrod B. Martin (jbmartin@bradley.com), James B. Bailey (jbailey@bradley.com), and Michael K. Riordan (mriordan@bradley.com); (b) counsel to any official committee appointed in this Chapter 11 Case; (c) counsel for the Office of the United States Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002 Attn: C. Ross Travis (C.Ross.Travis@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov); and (d) counsel to Citigroup Energy Inc., Attn: Jennifer Hardy (JHardy2@willkie.com).

- **Critical Vendor Motion.** Proposed counsel to the Debtor, Bradley Arant Boult Cummings LLP, 600 Travis Street, Suite 5600, Houston, TX 77002, Attn: Jarrod Martin (jbmartin@bradley.com), Michael Riordan (mriordan@bradley.com) and James Bailey (jbailey@ bradley.com).

- **Insurance Motion.** Proposed counsel to the Debtor, Bradley Arant Boult Cummings LLP, 600 Travis Street, Suite 5600, Houston, TX 77002, Attn: Jarrod Martin (jbmartin@bradley.com), Michael Riordan (mriordan@bradley.com) and James Bailey (jbailey@ bradley.com).

- **Utilities Motion.** Utility Notice Parties: (a) proposed counsel for the Debtor, Bradley Arant Boult Cummings LLP, 600 Travis, Suite 5600 Houston, Texas 77002, (Attn: Jarrod Martin (jbmartin@bradley.com), Michael Riordan (mriordan@bradley.com), and James Bailey (jbailey@bradley.com)); (b) the United States Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002 Attn: C. Ross Travis (C.Ross.Travis@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov), (c) counsel for Citigroup Energy Inc. and Citibank, N.A., and (d) counsel for any official committee of unsecured creditors (if appointed).

PLEASE TAKE FURTHER NOTICE that a copy of all documents filed in this Chapter 11 Case may be obtained free of charge by visiting https://www.veritaglobal.net/shannon. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at https://ecf.txsb.uscourts.gov in accordance with the procedures and fees set forth therein.

Dated: January 30, 2026
Houston, Texas

/s/ Jarrod B. Martin

BRADLEY ARANT BOULT CUMMINGS LLP
Jarrod B. Martin (TX Bar No. 24070221)
Michael K. Riordan (TX Bar No. 24070502)
Raneen I. Abdelghani (TX Bar No. 24140759)
Asiya Khan (TX Bar No. 24139763)
600 Travis Street, Suite 5600
Houston, Texas 77060
Telephone: (713) 576- 0300
Facsimile: (713) 547-0301
Email: jbmartin@bradley.com
mriordan@bradley.com

-and-

James Bailey (TX Bar No. 24108289)
1819 Fifth Avenue N.
Birmingham, AL 35203
Telephone: (205) 521-8000
Facsimile: (205) 488-6913
Email: jbailey@bradley.com

Proposed Counsel to the Debtor and Debtor in Possession

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 Debtors' claims agent.

/s/ Jarrod B. Martin
Jarrod B. Martin