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

In re:	Chapter 11
BANGO OIL LLC,[1]	Case No. 24-90508 (CML)
Reorganized Debtor.	(Jointly Administered)

VERTEX GUC TRUST'S MOTION FOR AN ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO GENERAL UNSECURED CLAIMS

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.

1. U.S. Bank Trust Company, National Association, not individually and solely in its capacity as the trustee (the "**GUC Trustee**") of the Vertex GUC Trust (the "**GUC Trust**"), by and through its undersigned counsel, respectfully submits this motion (the "**Motion**") to extend the deadline to object to general unsecured claims (the "**Claim Objection Deadline**") in the above-captioned case by 180 days from January 16, 2026 through and including July 15, 2026; in support of the Motion, the GUC Trust respectfully submits the *Declaration of Peter Finkel in Support of Vertex GUC Trust's Motion for an Order*

[1] The Reorganized Debtor's service address for purposes of this chapter 11 case is: 9107 West Russell Road, Suite 100, Las Vegas, Nevada 89148. The Reorganized Debtor's chapter 11 case was previously jointly administered under the chapter 11 case of Vertex Energy, Inc., Case No. 24-90507 (CML) (the "**Original Docket**"). Unless otherwise indicated, docket references in the Motion refer to docket entries on the Original Docket.

Further Extending Deadline to Object to Claims, attached hereto as **Exhibit A** (the "**Finkel Declaration**"); and thereby request entry of the proposed form of order granting the relief requested herein as annexed hereto as **Exhibit B** (the "**Proposed Order**"). In support of the Motion and entry of the Proposed Order, the GUC Trust respectfully states as follows:

Jurisdiction and Venue

2. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. § 1334 and Article XI of the *Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates* (as supplemented and otherwise amended, the "**Plan**").[2] The Motion is a core proceeding pursuant to 28 U.S.C. § 157. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Basis for Relief

3. The GUC Trust seeks to extend the Claim Objection Deadline by 180 days, from January 16, 2026 through and including July 15, 2026, pursuant to section 105(a) of chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Rule 9013-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the "**Local Bankruptcy Rules**"), Section K of the Procedures for Complex Cases in the Southern District of Texas, effective October 18, 2023 (the "**Complex Case Procedures**"), and Section 4.I.2 of the Plan (defined below), without prejudice to the GUC Trust's ability to seek a further extension of the Claims Objection Deadline.[3]

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[2] Docket No. 564. Capitalized terms used but not defined in this Motion have the meanings ascribed to them in the Plan.

[3] The current Claim Objection Deadline is January 16, 2026. Section K of the Complex Case Procedures provides that, "if a motion is filed that complies with these procedures to extend the time to take any action

Background

4. On September 24, 2024 (the "**Petition Date**"), Vertex Energy, Inc. and certain of its affiliates (collectively, the "**Debtors**" and upon emergence from bankruptcy, the "**Reorganized Debtors**") filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. From and after the Petition Date, the Debtors operated their businesses and managed their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On December 20, 2024, the Court entered an order confirming the Plan (the "**Confirmation Order**").[4] The Plan became effective on January 21, 2025 (the "**Effective Date**").[5]

6. The Plan and Confirmation Order established the GUC Trust on the Effective Date pursuant to the terms of the General Unsecured Clams Trust Agreement.[6] On the Effective Date, the GUC Trustee was appointed to administer the GUC Trust.

7. Article VII of the Plan provides that, "after the Effective Date, the Reorganized Debtors and the GUC Trustee (solely with respect to general unsecured claims), as applicable, have the exclusive authority to (a) file, withdraw, or litigate to judgment any objections to Claims, (b) settle or compromise any such objections to Claims without further notice to or action, order, or approval of the Bankruptcy Court, and (c) administer and adjust the Claims

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before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion." By filing this Motion prior to the expiration of the Claim Objection Deadline, the Claim Objection Deadline is automatically extended until the Court resolves the Motion.

[4] Docket No. 578

[5] Docket No. 646

[6] The substantially final form of the General Unsecured Claim Trust Agreement was filed on December 17, 2024 as part of a Plan Supplement. Docket No. 544.

Register to reflect such settlements or compromises without further notice to or action, order, or approval of the Court."[7]

8. The GUC Trust has the primary responsibility for reconciling general unsecured claims; provided, that the Debtors, Reorganized Debtors and Consenting Term Loan Lenders, in consultation with the GUC Trust, have the express right to object to and prosecute objections to Claims not allowed under the Plan.[8]

9. On April 1, 2025, the Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (the "**Final Decree**"),[9] which closed all of the Debtors' chapter 11 cases except for Case No. 24-90508. Pursuant to the Final Decree, the Court retains jurisdiction and authority over, among other things, the claims reconciliation process. The Final Decree also directs that any actions or pleadings regarding the claims reconciliation process be filed, administered, and/or adjudicated in Case No. 24-90508 (the "**Current Docket**").[10]

A. <u>Bar Dates</u>

10. On October 28, 2024, the Court entered the *Order (I) Establishing Deadlines for the Filing of Proofs of Claim, (II) Approving Form and Manner of Notice Thereof, (III) Approving the Form and Manner for Filing Proofs of Claim, and (IV) Granting Related Relief* (the "**Bar Date Order**").[11] Among other things, the Bar Date Order established (i) November 27, 2024 as the deadline for creditors to file Proofs of Claim to assert any claims against the Debtors that arose before the Petition Date (the "**General Bar Date**") and (ii) March 24, 2025 as the

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7 *See* Plan at Art. VII.B.

8 *See* Plan at Art. IV.I.2.

9 Docket No. 760.

10 Final Decree ¶ 5. Prior to entry of the Final Decree, Case No. 24-90507 was the main case and docket for the Debtors' chapter 11 cases.

11 Docket No. 312.

deadline for Governmental Units to file Proofs of Claim to assert any claims against the Debtors that arose before the Petition Date (the "**Governmental Bar Date**"). The Bar Date Order also set the deadline to file a Proof of Claim relating to the Debtors' rejection of any executory contract or unexpired lease as the later of (a) the General Bar Date or Government Bar Date, as applicable, and (b) thirty (30) days after the entry of the order rejecting the applicable executory contract or unexpired lease.

11. On October 25-30, 2024, the Debtors filed their Schedules and Statements of Financial Affairs.[12]

12. Pursuant to the Plan, the Claim Objection Deadline was initially 180 days after the Effective Date.[13] On July 17, 2025, the Court entered an order extending the Claim Objection Deadline to January 16, 2026.[14]

13. The relief requested in this motion is the second request by the GUC Trust to extend the Claim Objection Deadline.

B. <u>Claim Reconciliation Process</u>

14. Approximately 530 Proofs of Claim have been filed in the chapter 11 cases asserting, in whole or in part, general unsecured claims, and approximately 635 general unsecured claims were scheduled by Debtors which were not marked as contingent, unliquidated or disputed. Filed and scheduled claims collectively assert approximately $914.7 million of general unsecured claims.

15. Following the Effective Date, the GUC Trust undertook its review of general unsecured claims, coordinated with the Reorganized Debtors to establish omnibus claim

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12 Docket Nos. 260-308, 336-341.

13 *See* Plan at § 4.I.2.

14 Current Docket No. 71.

objection procedures ("**Omnibus Claim Objection Procedures**")[15] to streamline the claim reconciliation process, worked with the Reorganized Debtors to resolve certain claim issues consensually, and begun to assess the causes of action assigned to the GUCTrust. The approved Omnibus Claim Objection Procedures permit the GUC Trust to object on an omnibus basis to disputed claims on the grounds set forth in Bankruptcy Rule 3007(d) and on certain additional approved grounds.

16. On July 16, 2025, the GUC Trust filed two omnibus claim objections which collectively sought to expunge approximately $46.4 million in disputed claims. Since the last extension of the Claim Objection Deadline, the Trust has analyzed Debtors' books and records to ascertain which general unsecured claims were satisfied pursuant to Court-approved post-petition payments.[16] The GUC Trust expects to file shortly a notice, or several notices, of satisfaction of claims that will further reduce the claim pool by approximately $43.4 million. Additionally, the GUC Trust is conducting a substantive review of material claims to determine whether such claims should be allowed as filed, reduced or disallowed.

17. Although the GUC Trust has made progress reconciling the general unsecured claims, additional work remains. The GUC Trust estimates that it will take at least another 180 days to complete its review and reconciliation and, therefore, believes an extension of the Claim Objection Deadline is necessary.

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15 *Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief*. Current Docket No. 8.

16 Such payments include amounts paid pursuant to the *Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(b)(9) Claimants, (B) Lien Claimants, (C) Critical Vendors, and (D) HSE Suppliers, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief*, and the *Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(b)(9) Claimants, (B) Lien Claimants, (C) Critical Vendors, and (D) HSE Suppliers, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief*. Docket Nos. 57 and 330.

Support for Requested Relief

18. The Plan, Bankruptcy Code and Bankruptcy Rules provide ample authority for the Court to grant the requested relief. Additionally, the facts and circumstances of these chapter 11 cases demonstrate that cause exists to extend the Claim Objection Deadline.

19. First, the Plan contemplates that the GUC Trust's deadline to object to general unsecured claims may be extended by order of the Bankruptcy Court.[17]

20. Second, section 105(a) of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a); *see also In re Sanchez*, 372 B.R. 289, 309–10 (Bankr. S.D. Tex. 2007) (describing the scope of a bankruptcy court's authority under section 105(a)); *In re CEI Roofing, Inc.*, 315 B.R. 50, 55–56 (Bankr. N.D. Tex. 2004); *In re Cooper Props. Liquidating Trust, Inc.*, 61 B.R. 531, 537 (Bankr. W.D. Tenn. 1986) (noting that the bankruptcy court is "one of equity and as such it has a duty to protect whatever equities a debtor may have in property for the benefit of its creditors as long as that protection is implemented in a manner consistent with the bankruptcy laws.").

21. Furthermore, Bankruptcy Rule 9006(b)(1) provides, in pertinent part, that:

> This paragraph (1) applies when these rules, a notice given under these rules, or a court order requires or allows an act to be performed at or within a specified period. Except as provided in (2) and (3), the court may—at any time and for cause—extend the time to act if: (A) with or without a

[17] Plan § 4.I.2 ("All objections to General Unsecured Claims and 2027 Convertible Notes Claims must be filed by the GUC Trustee within 180 days of the Effective Date, unless extended by order of the Bankruptcy Court.").

> motion or notice, a request to extend is made before the period (or a previously extended period) expires . . . .

Fed. R. Bankr. P. 9006(b)(1).

22. Extensions of time to object to claims have been granted in other chapter 11 cases in this District where there are a substantial number of claims and complex issues. *See, e.g.*, *In re Dreamwell, Ltd.*, Case No. 23-90024 (CML) (Bankr. S.D. Tex. January 17, 2024) (Docket No. 67) (granting a first request to extend the deadline to object to claims by 180 days); *In re Dean Foods Co.*, Case No. 19-36314 (CML) (Bankr. S.D. Tex. Dec. 7, 2022) (Docket No. 1130) (granting a second request to extend the deadline to object to claims by an additional 166 days); *In re Griddy Energy, LLC*, Case No. 21-30923 (MI) (Bankr. S.D. Tex. May 30, 2023) (Docket No. 513) (granting a second request to extend the deadline to object to claims by an additional 18 months); *In re SpeedCast International Limited, et al.*, Case No. 20-32243 (MI) (Bankr. S.D. Tex. Jan. 26, 2023) (Docket No. 2037) (granting a fifth request to extend the deadline to object to claims by an additional 181 days); *In re Chesapeake Energy Corporation*, Case No. 20-33233 (DRJ) (Bankr. S.D. Tex. July 29, 2021) (Docket No. 3932) (initial deadline to object to claims extended by 180 days); *In re Neiman Marcus Group Ltd LLC, et al.*, Case No. 20-32519 (DRJ) (Bankr. S.D. Tex. Mar. 23, 2021) (Docket No. 2352) (deadline to object to claims extended by 180 days).

23. The GUC Trust submits that cause exists to extend the Claim Objection Deadline for an additional 180 days through and including July 15, 2026. As discussed above, although the GUC Trustee and its advisors have made progress, the GUC Trustee continues to review and assess claims that have been filed against the Debtors and requires additional time to complete such review and to negotiate with claimants, and to prepare and file objections to claims, as necessary.

24. The GUC Trust further submits that the requested extension is not sought for purposes of delay and will not prejudice claimants asserting general unsecured claims or other parties in interest. Absent the requested extension, creditors will be harmed because the GUC Trust will not be able to fully address all general unsecured clams before the expiration of the Claim Objection Deadline, and invalid, satisfied or overstated claims may receive unwarranted distributions from the GUC Trust, thereby diluting the recoveries on account of legitimate claims. The requested relief will prevent such an inequitable result, is in the best interests of the GUC Trust and the Debtors' creditors and is necessary and appropriate to ensure that the Claims reconciliation process, including the prosecution of any objections to claims, is accurate, comprehensive, and completed in a timely and efficient manner.

25. Accordingly, the GUC Trust respectfully requests that the Court enter an order extending the Claim Objection Deadline for an additional 180 days, from January 16, 2026 through and including July 15, 2026, without prejudice to the GUC Trust's ability to seek further extensions.

Notice

26. Notice of this Motion will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Local Bankruptcy Rule 9013-1(d).

WHEREFORE the GUC Trust respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: January 13, 2026
Houston, Texas

/s/ James S. Carr

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Counsel for the Vertex GUC Trust

Certificate of Service

I hereby certify that, on January 13, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed as soon as practicable following the date hereof.

/s/ Philip A. Weintraub
Philip A. Weintraub

Exhibit A

Finkel Declaration

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

In re:	Chapter 11
BANGO OIL LLC,[1]	Case No. 24-90508 (CML)
Reorganized Debtor.	(Jointly Administered)

DECLARATION OF PETER FINKEL
IN SUPPORT OF VERTEX GUC TRUST'S MOTION FOR AN
ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS

I, Peter Finkel, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Vice President of U.S. Bank Trust Company, National Association ("**U.S. Bank**"), and an authorized representative of U.S. Bank in its capacity as the trustee (the "**GUC Trustee**") of the Vertex GUC Trust (the "**GUC Trust**") established in the above-captioned case. Under the *Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates* (the "**Plan**"),[2] the GUC Trust, by and through the GUC Trustee, is responsible for reconciling and, as necessary, objecting to all general unsecured claims filed or scheduled against the Debtors' estates. In that capacity, I am familiar with, and am assisting in, the process of reviewing and reconciling the claims for which the GUC Trust is responsible.

2. Statements made in this Declaration are made to the best of my knowledge and belief and are based on the information and records available to me, including information,

[1] The Reorganized Debtor's service address for purposes of this chapter 11 case is: 9107 West Russell Road, Suite 100, Las Vegas, Nevada 89148. The Reorganized Debtor's chapter 11 case was previously jointly administered under the chapter 11 case of Vertex Energy, Inc., Case No. 24-90507 (CML) (the "**Original Docket**"). Unless otherwise indicated, docket references in this declaration refer to docket entries on the Original Docket.

[2] Docket No. 564.

advice and analysis provided by professionals engaged by the GUC Trust. I am authorized to submit this declaration on behalf of the GUC Trust in support of the *Vertex GUC Trust*'s *Motion for an Order Further Extending Deadline to Object to Claims* (the "**Motion**"),[3] filed contemporaneously herewith. If I were called upon to testify, I could and would competently testify to the facts set forth herein.

3. To date, approximately 530 Proofs of Claim have been filed in the chapter 11 cases asserting, in whole or in part, general unsecured claims, and approximately 635 general unsecured claims were scheduled by Debtors which were not marked as contingent, unliquidated or disputed. Filed and scheduled claims collectively assert approximately $914.7 million of general unsecured claims.

4. Following the Effective Date, the GUC Trust, among other things, undertook its review of general unsecured claims, coordinated with the Reorganized Debtors to establish omnibus claim objection procedures ("**Omnibus Claim Objection Procedures**")[4] to streamline the claim reconciliation process, worked with the Reorganized Debtors to resolve certain claim issues consensually, and begun to assess the causes of action assigned to the GUC Trust. The approved Omnibus Claim Objection Procedures permit the GUC Trust to object to disputed claims on an omnibus basis on the grounds set forth in Bankruptcy Rule 3007(d) and on certain additional approved grounds.

5. On July 16, 2025, the GUC Trust filed two omnibus claim objections which collectively sought to expunge approximately $46.4 million in disputed claims. Since the last extension of the Claim Objection Deadline, the GUC Trustee through its professionals have

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

[4] *See Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief*. Case No 24-90508, Docket No. 8.

analyzed Debtors' books and records to ascertain which general unsecured claims were satisfied pursuant to Court-approved post-petition payments.[5] The GUC Trustee expects to file shortly a notice, or several notices, of satisfaction of claims that will further reduce the claim pool by approximately $43.4 million. Additionally, the GUC Trustee, through its professionals, is conducting a substantive review of material claims to determine whether such claims should be allowed as filed, reduced or disallowed.

6. Although the GUC Trust has made progress reconciling the general unsecured claims, additional work remains. The GUC Trustee estimates that it will take at least another 180 days to complete its review and reconciliation and, therefore, believes an extension of the Claim Objection Deadline is necessary.

7. To the best of my knowledge and belief, and based on the information and records available to me, I believe that the requested extension of the Claim Objection Deadline is reasonable and is not sought for the purposes of delay. I do not believe that the relief requested in the Motion will prejudice claimants asserting general unsecured claims other parties in interest.

8. In light of the foregoing, to the best of my knowledge and belief, and based on the information and records available to me, I believe that extending the Claim Objection Deadline is necessary and appropriate to ensure that the reconciliation of general unsecured claims, including the prosecution of any objections to claims, is accurate, comprehensive, and completed in a timely and efficient manner.

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[5] Such payments include amounts paid pursuant to the *Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(b)(9) Claimants, (B) Lien Claimants, (C) Critical Vendors, and (D) HSE Suppliers, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief*, and the *Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(b)(9) Claimants, (B) Lien Claimants, (C) Critical Vendors, and (D) HSE Suppliers, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief*. Docket Nos. 57 and 330.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct to the best of my knowledge, information, and belief.

Dated: January 13, 2026

/s/ Peter Finkel
Peter Finkel
Default Relationship Manager
U.S. Bank Trust Company, National Association

Exhibit B

Proposed Order

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

In re:	Chapter 11
BANGO OIL LLC,[1]	Case No. 24-90508 (CML)
Reorganized Debtor.	(Jointly Administered)

ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Upon the motion (the "**Motion**")[2] of the Vertex GUC Trust, seeking entry of an order (this "**Order**") pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(b), Local Bankruptcy Rule 9013-1, Section K of the Complex Case Procedures, and Section 4.I.2 of the Plan, extending the Claim Objection Deadline from January 16, 2026 through and including July 15, 2026, all as more fully set forth in the Motion and the Finkel Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and Article XI of the Plan; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion

[1] The Reorganized Debtor's service address for purposes of this chapter 11 case is: 9107 West Russell Road, Suite 100, Las Vegas, Nevada 89148. The Reorganized Debtor's chapter 11 case was previously jointly administered under the chapter 11 case of Vertex Energy, Inc., Case No. 24-90507 (CML).

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

establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the estates and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Claim Objection Deadline is hereby extended through and including July 15, 2026.

2. The entry of this Order is without prejudice to the GUC Trust's ability to seek a further extension of the Claim Objection Deadline upon a motion by the GUC Trust filed on or before July 15, 2026, or to seek other appropriate relief.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2026
Houston, Texas

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE