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Counsel to Ankura Trust Company, LLC, in its Capacity as Litigation Trustee of the Vista Litigation Trust

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	Chapter 11
VISTA PROPPANTS AND LOGISTICS, LLC, *et al.*,	§	Case No. 20-42002-ELM-11
Reorganized Debtors.[1]	§	(Jointly Administered)

MOTION OF THE LITIGATION TRUSTEE FOR ENTRY OF AN ORDER (I) AUTHORIZING SUBSTITUTION OF COUNSEL AND (II) WAIVING THE LOCAL COUNSEL REQUIREMENT OF LOCAL RULE 2090-4(a)

Ankura Trust Company, LLC (the "Litigation Trustee"), solely in its capacity as the Litigation Trustee of the Vista Litigation Trust ("Litigation Trust") established by the confirmed

[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: Vista Proppants and Logistics, LLC (7817); VPROP Operating, LLC (0269); Lonestar Prospects Management, L.L.C. (8451); MAALT Specialized Bulk, LLC (2001); Denetz Logistics, LLC (8177); Lonestar Prospects, Ltd. (4483); and MAALT, LP (5198). The location of the Reorganized Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119.

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plan of reorganization (the "Plan")[2] of the above-captioned debtors and debtors in possession (collectively, prior to the Effective Date of the Plan, the "Debtors" and, following the Effective Date of the Plan, the "Reorganized Debtors"), hereby moves this Court to enter an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") (i) substituting David Wender of Eversheds Sutherland (US) LLP in place of Kilpatrick Townsend & Stockton LLP as "Local Counsel" for the Litigation Trustee in accordance with the requirements of, and as defined in, rule 2090-4(a) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the "Local Rules"), as needed, and (ii) waiving the residency requirement for Local Counsel, or alternatively the Local Counsel requirement, contained in Local Rule 2090-4(a). In support of this Motion, the Litigation Trustee respectfully states as follows:

BASIS FOR RELIEF

A. Substitution of Counsel

1. The Litigating Trustee currently is represented by co-counsel (i) Eversheds Sutherland (US) LLP ("Eversheds Sutherland") and (ii) Kilpatrick Townsend & Stockton LLP ("Kilpatrick Townsend) in the above-captioned chapter 11 cases. Kilpatrick Townsend currently serves as the Liquidating Trustee's "Local Counsel" in accordance with the requirements of, and as defined in, Local Rule 2090-4(a).

2. Todd C. Meyers and Danielle Barav-Johnson lead the representation of the Liquidating Trustee for Eversheds Sutherland.

3. Kilpatrick Townsend seeks to withdraw as counsel to the Liquidating Trustee.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan (as further identified below).

4. The Litigation Trustee requests that the Court enter an order approving the withdrawal of Kilpatrick Townsend as counsel. For the avoidance of doubt, the Litigation Trustee wishes for Mr. Meyers and Ms. Barav-Johnson of Eversheds Sutherland to remain as its counsel.

5. The Litigation Trustee approves of the withdrawal of Kilpatrick Townsend as counsel. This substitution is not sought for purposes of delay and will not prejudice the rights of the Litigation Trustee or delay the processing of these cases.

6. Accordingly, the Litigation Trustee requests that the relief requested herein be approved.

B. Waiver of Local Counsel Requirement of Local Rule 2090-4(a)

7. David A. Wender of Eversheds Sutherland wishes to appear as counsel to the Litigation Trustee, together with Mr. Meyers and Ms. Barav-Johnson, and to serve as Local Counsel in accordance with Local Rule 2090-4(a) in place of Kilpatrick Townsend, as required.

8. Mr. Wender's pertinent information is as follows:

David A. Wender (Texas Bar No. 24081945)
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999 Peachtree St NE, Suite 2300
Atlanta, Georgia 30309
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9. Mr. Wender is admitted to practice and is a member in good standing of the Texas State Bar (No. 24081945) and the Georgia State Bar (No. 748117). However, Eversheds Sutherland does not maintain an office within 50 miles of the Court.

10. Local Rule 2090-4(a) requires an attorney appearing in a bankruptcy case in this district to retain Local Counsel "who resides or maintains an office within 50 miles of the division in which the case is pending" if that appearing attorney does not reside or maintain an office within

such 50-mile radius. Local Rule 2090-4(a) further provides that counsel may seek leave of the Court to proceed without Local Counsel.

11. Mr. Wender, Mr. Meyers, and Ms. Barav-Johnson (collectively, the "Eversheds Sutherland Attorneys") have reviewed and are familiar with the Local Rules and have appeared in the Bankruptcy Court for the Northern District of Texas on various occasions.

12. Should the Court require an in-person appearance, one of the Eversheds Sutherland Attorneys would be able to travel on short notice to the Court.

13. The Litigation Trustee believes that the Eversheds Sutherland Attorneys can provide the duties required of Local Counsel, as required by Local Rule 2090-4(b).

14. The Litigation Trustee believes that good cause exists for a waiver of the residency requirement for Local Counsel contained in Local Rule 2090-4 or, in the alternative, a waiver of the requirement to retain Local Counsel contained in Local Rule 2090-4.

15. If the Court disagrees, the Liquidating Trustee will retain Local Counsel.

16. The Litigation Trustee requests that the Court enter an order (i) approving the substitution of Mr. Wender as Local Counsel in place of Kilpatrick Townsend, to the extent Local Counsel is required, and waiving the residency requirement of Local Rule 2090-4(b); or, (ii) in the alternative, waiving the Local Counsel requirement under Local Rule 2090-4(b).

[*Remainder of Page Intentionally Blank.*]

WHEREFORE, the Litigation Trustee respectfully requests that the Court enter an order substantially in the form of the Proposed Order attached hereto as **Exhibit A** (i) granting the relief requested herein and (ii) granting such other and further relief as the Court deems appropriate under the circumstances.

Dated: January 12, 2026

/s/ Maeghan Whitehead

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– and –

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Counsel to Ankura Trust Company, LLC, solely in its Capacity as Litigation Trustee of the Vista Litigation Trust

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	Chapter 11
VISTA PROPPANTS AND LOGISTICS, LLC, et al.,	§	Case No. 20-42002-ELM-1
Reorganized Debtors.[1]	§	(Jointly Administered)

ORDER GRANTING MOTION OF THE LITIGATION TRUSTEE TO SUBSTITUTE COUNSEL AND TO WAIVE THE LOCAL COUNSEL REQUIREMENT OF LOCAL RULE 2090-4(a)

[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: Vista Proppants and Logistics, LLC (7817); VPROP Operating, LLC (0269); Lonestar Prospects Management, L.L.C. (8451); MAALT Specialized Bulk, LLC (2001); Denetz Logistics, LLC (8177); Lonestar Prospects, Ltd. (4483); and MAALT, LP (5198). The location of the Reorganized Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119-4219.

Upon the *Motion of the Litigation Trustee for Entry of an Order (I) Authorizing Substitution of Counsel and (II) Waiving the Local Counsel Requirement of Local Rule 2090-4(a)* (the "Motion")[2] filed by Ankura Trust Company, LLC (the "Litigation Trustee"), solely in its capacity as Litigation Trustee of the Vista Litigation Trust (the "Litigation Trust") established by the confirmed plan of reorganization (the "Plan") of the above-captioned debtors and debtors in possession, the Court having reviewed the Motion; and it appearing that the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of this case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the notice of the Motion and the opportunity for hearing thereon was sufficient, and that no other or further notice need be provided; and this Court having found that upon the record herein and after due deliberation thereon, good and sufficient cause exists for granting the relief requested in the Motion, as set forth herein; it is therefore,

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion and the relief requested therein is GRANTED as provided herein.

2. Kilpatrick Townsend & Stockton, LLP ("Kilpatrick Townsend") is relieved of obligations and duties in this Court as counsel for the Litigation Trustee in these cases.

3. Todd C. Meyers and Danielle Barav-Johnson shall remain as counsel for the Litigation Trustee.

4. David A. Wender of Eversheds Sutherland (US) LLP ("Eversheds Sutherland") is substituted in place of Kilpatrick Townsend as "Local Counsel" for the Litigation Trustee in

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

accordance with the requirements of, and as defined in, rule 2090-4(a) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the "Local Rules").

5. The requirement of Local Rule 2090-4(a) to retain Local Counsel who resides or maintains an office within 50 miles of the division in which the case is pending is hereby waived.

6. [Alternatively: The requirement for the Litigation Trustee to retain Local Counsel in the above-captioned cases pursuant to Local Rule 2090-4(a) is hereby waived.]

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

8. The Litigation Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. This Court shall retain jurisdiction to hear and determine all matters arising from and related to the entry of this Order.

 # # # END OF ORDER # # #

Submitted by:

/s/ Maeghan Whitehead

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– and –

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Counsel to Ankura Trust Company, LLC,
Solely in its Capacity as Litigation Trustee of the
Vista Litigation Trust

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January 2026, I caused a true and correct copy of the foregoing document to be served by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC now known as Verita Global, upon all parties eligible to receive services through electronic mail and first class mail.

/s/ Maeghan Whitehead
Maeghan Whitehead