Docket #1150 Date Filed: 10/16/2026

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Counsel to Ankura Trust Company, LLC,
in its Capacity as 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.,[1]	§	Case No. 20-42002-ELM-11
Reorganized Debtors.	§	(Jointly Administered)

MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON SECOND MOTION OF THE LITIGATION TRUSTEE TO EXTEND THE TERM OF THE LITIGATION TRUST

Ankura Trust Company, LLC (the "Trustee" or "Litigation Trustee"), as trustee of the Vista Litigation Trust (the "Trust" or "Litigation Trust") established by the confirmed 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"), submits this *Motion for Setting and Request for Expedited Hearing on Second Motion of the Litigation Trustee to Extend the Term of the*

[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.

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

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Litigation Trust (the "Motion") and requests entry of an order (i) setting a hearing on the *Second Motion of the Litigation Trustee to Extend the Term of the Litigation Trust* [Dkt. No. 1149] (the "Second Extension Motion"), filed contemporaneously herewith, on Thursday, November 5, 2026 at 1:30 p.m. (CT), and (ii) setting November 2, 2026 at 4:00 p.m. (CT) as the deadline to object to the Second Extension Motion. In support, the Trustee states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion as a core proceeding pursuant to 28 U.S.C. §§ 157(b) and 1334. This Court retained jurisdiction over this proceeding pursuant to paragraph 80 of the Confirmation Order (as defined below) and Article XI of the Plan. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested in this Motion are section 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), and Rules 9006(c)(1) and 9006(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). Further, this Motion is consistent with paragraph 5(b) of the *Order Granting Complex Chapter 11 Case Treatment* [Dkt. No. 95] (the "Complex Case Order"), which established certain procedures for the Debtors' chapter 11 proceedings, and paragraph 4 of Exhibit E to the *Procedures for Complex Chapter 11 Cases* adopted by General Order 2006-02 (the "Complex Case Procedures"), which applied to the Debtors' chapter 11 cases when they were filed.

BACKGROUND

3. On June 9, 2020, the Debtors commenced these cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to an order entered on June 12, 2020 [Dkt. No. 66], the Debtors' chapter 11 cases are being jointly administered for procedural purposes only. On June 16, 2020, the Court entered the Complex Case Order with respect to the Debtors' chapter 11 proceedings.

4. On October 28, 2020, the Court entered an order [Dkt. No. 717] (the "Confirmation Order") confirming the *Fourth Amended Joint Plan of Reorganization of Vista Proppants and Logistics, LLC, et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 682] (as confirmed, the "Plan").

5. The Plan became effective in accordance with its terms on November 6, 2020 (the "Effective Date"), at which time the Debtors emerged from chapter 11 as the Reorganized Debtors. *See Notice of Effective Date of the Fourth Amended Joint Plan of Reorganization of Vista Proppants and Logistics, LLC, et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 748].

6. Among other things, the Plan provides for the creation of the Litigation Trust for the purpose of prosecuting and liquidating certain causes of action (collectively, the "Litigation Claims"). *See* Plan, § IV.P. The Litigation Trustee was appointed as trustee of the Litigation Trust. *See* Confirmation Order, ¶¶ 2, 43. Pursuant to the Plan, the Trustee also is responsible for reconciling, objecting to, and resolving all objections and disputes with respect to the General Unsecured Claims, Plan, § VII.A, and making distributions to holders of Allowed Class 6 General Unsecured Claims, Plan, Ex. A at 5; *see also* Plan, § IV.P.

7. The Trust is governed by the Trust Agreement, which caps the term of the Trust at five years from the Effective Date but permits the Court, upon a motion filed within six months before the end of the term or any extension period thereof, to extend the term of the Trust for a finite period (not to exceed three years in the aggregate absent a favorable IRS ruling). *See* Plan, § IV.P; Trust Agreement § 16.1.

8. On October 9, 2025, the Trustee moved to extend the term of the Trust [Dkt. No. 1119] (the "First Extension Motion"). On November 6, 2025, the Court granted the First Extension Motion and extended the term through and including November 6, 2026, without prejudice to further extensions [Dkt. No. 1126] (the "First Extension Order").

9. Concurrently herewith, the Trustee has filed the Second Extension Motion seeking a one-year extension of the Trust's term through and including November 6, 2027, to conclude its administration of certain Litigation Trust Matters, as further described therein.

RELIEF REQUESTED AND BASIS FOR EXPEDITED HEARING

10. Section 105(a) of the Bankruptcy Code authorizes the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Bankruptcy Rule 9006(c)(1) permits the Court to reduce notice periods for cause, and Bankruptcy Rule 9006(d) permits the Court to fix the period of notice for a motion by order.

11. The Complex Case Order that applied to the Debtors' chapter 11 proceedings, and the Complex Case Procedures, to the extent applicable here, provide that a matter is "expedited" when it would be heard on less than 24 days' and 23 days' notice, respectively. *See* Complex Case Order ¶ 5(b) (separate motion for expedited hearing required for consideration on less than 24 days' notice); Complex Case Procedures ¶ 2 (defining "Expedited" as a matter heard on less than 23 days' notice).

12. Cause exists for an expedited hearing and shortened notice of the Second Extension Motion. Under the First Extension Order, the term of the Litigation Trust was extended through and including November 6, 2026, which is less than 23 days after the filing of the Second Extension Motion (*i.e.*, November 6, 2026, is 21 days after the filing). If a hearing on the Second Extension Motion is set with 23 days' notice, the hearing would occur after November 6, 2026, the current expiration date of the Trust. It is very important that the Litigation Trust's term be extended for the reasons set forth in the Second Extension Motion. The Trustee seeks expedited consideration of the Second Extension Motion to ensure the Court can grant the requested relief before the Trust's term ends.

13. The Trustee therefore requests a hearing on the Second Extension Motion to be set for November 5, 2026 at 1:30 p.m. (CT), and to establish November 2, 2026 at 4:00 p.m. (CT) as

the deadline to file and serve objections to the Second Extension Motion to allow the Trustee sufficient time to address responses, if any are filed, prior to the hearing.

NOTICE

14. Notice of this Motion and the Second Extension Motion has been provided to (i) the Office of the United States Trustee, (ii) counsel to the Reorganized Debtors, (iii) the members of the Oversight Committee, and (iv) all parties requesting notice under Bankruptcy Rule 2002. Upon entry of an order granting this Motion, the Trustee will promptly serve notice of the hearing and objection deadline on the same parties. The Trustee submits that no other or further notice is required.

WHEREFORE, for the reasons set forth herein, the Trustee respectfully requests that the Court enter an order substantially in the form attached as **Exhibit A** (i) setting a hearing on the Second Extension Motion for November 5, 2026 at 1:30 p.m. (CT), (ii) setting November 2, 2026 at 4:00 p.m. (CT) as the objection deadline, and (iii) granting such other relief as is just and proper.

Dated: October 16, 2026
Dallas, Texas

/s/ David A. Wender

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

EXHIBIT A

Proposed Order

David A. Wender (Texas Bar No. 24081945)
Todd C. Meyers (admitted *pro hac vice*)
Danielle Barav-Johnson (admitted *pro hac vice*)
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
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In re:	§	Chapter 11
VISTA PROPPANTS AND LOGISTICS, LLC, et al.,	§	Case No. 20-42002-ELM-11
Reorganized Debtors.	§	(Jointly Administered)

ORDER GRANTING MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON SECOND MOTION OF THE LITIGATION TRUSTEE TO EXTEND THE TERM OF THE LITIGATION TRUST

On this date, the Court considered the *Motion for Setting and Request for Expedited Hearing on Second Motion of the Litigation Trustee to Extend the Term of the Litigation Trust* [Dkt. No. 1149] (the "Motion"),[1] filed by the Trustee in the above-captioned chapter 11 cases; and the Court having jurisdiction to consider the Motion and the relief requested in it in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion being a core proceeding in accordance with 28 U.S.C. § 157(b)(2); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of the Motion having been given; and the Court having determined that cause exists under Bankruptcy Rule 9006(c)(1) and section 105(a) of the Bankruptcy Code to consider the *Second Motion of the Litigation Trustee to Extend the Term of the Litigation Trust* [Dkt. No. 1149] (the "Second Extension Motion") on an expedited basis; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is hereby granted as set forth herein.

2. A hearing on the Second Extension Motion shall be held on Thursday, November 5, 2026, at 1:30 p.m. (CT) before the Honorable Edward L. Morris, United States Bankruptcy Court, 501 W. Tenth Street, Room 204, Fort Worth, Texas 76102. The hearing will be conducted both in person and by virtual means. Parties may attend virtually through the Court's virtual hearing platform, and directions for accessing the virtual hearing platform are available on the Court's website.

3. Any objection to the Second Extension Motion shall be filed and served so as to be received no later than November 2, 2026 at 4:00 p.m. (CT).

[1] Capitalized terms used but not defined herein shall have the meaning set forth in the Motion.

4. Counsel for the Trustee shall serve notice of the hearing and objection deadline within one business day after entry of this Order on the parties identified in the Second Extension Motion.

 # # # END OF ORDER # # #

Submitted by:

/s/ David A. Wender
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Danielle Barav-Johnson (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2026, I caused a true and correct copy of the foregoing document to be served by the Reorganized Debtors' claims and noticing agent, Verita Global, upon all parties eligible to receive service by electronic mail and first-class mail.

Respectfully Submitted,
/s/ *David A. Wender*
David A. Wender