

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

In re:	§	
	§	Chapter 11
	§	
Barrow Shaver Resources Company LLC, ¹	§	Case No. 24-33353
	§	
	§	
Debtor.	§	

**MOTION TO EXTEND DEADLINE TO FILE
ESTATE CLAIMS AND AVOIDANCE ACTIONS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Barrow Shaver Resources Company LLC (the “**Debtor**” or “**BSR**”), debtor and debtor-in-possession in the above-captioned chapter 11 bankruptcy case (the “**Bankruptcy Case**”), files this *Motion to Extend Deadline to File Estate Claims and Avoidance Actions* (the “**Motion**”), requesting that the Court, pursuant to Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), enlarge the time to file estate claims, including causes of

¹ The last four digits of the Debtor’s federal tax identification number are 0510. The Debtor’s corporate headquarters is located at 977 Pruitt Place, Tyler, TX 75703.

action under chapter 5 of title 11 of the United States Code (the “**Bankruptcy Code**”), to and including November 17, 2026, and to enlarge by 90 days the applicable deadlines under section 549(d) of the Bankruptcy Code for the avoidance of post-petition transfers. In support of the Motion, the Debtor respectfully states as follows:

PRELIMINARY STATEMENT²

1. As this Court is aware, the Bankruptcy Case has been complex and highly contested from the outset, and has required the Debtor to address significant operational, transactional, and litigation-related challenges while managing its restructuring efforts. The Debtor has had to prioritize, among other things, the Sale, extensive discovery related to disputes with purported working interest owners, and efforts to resolve claims and advance its proposed chapter 11 plan.

2. The Debtor has devoted substantial time and resources to balancing these competing demands, which has impacted its ability to focus on other matters, including the Estate Claims and the Avoidance Actions. Although the Debtor, through its CRO, has commenced a comprehensive investigation into the Estate Claims and Avoidance Actions, that work remains ongoing.

3. The current deadlines under sections 108(a) and 546(a) of the Bankruptcy Code will expire on August 19, 2026, while the deadlines under section 549(d) of the Bankruptcy Code will expire from August 19, 2026 to December 19, 2027. Absent a reasonable extension, the Debtor risks forfeiting valuable Estate Claims and Avoidance Actions before it has had a complete opportunity to finalize its investigation to make informed determinations regarding litigation.

² Capitalized terms used in the Preliminary Statement but not otherwise defined have the meaning ascribed below.

4. Accordingly, to preserve potential value for the estate pending completion of the investigation, the Debtor seeks a 90-day extension of these deadlines. The requested relief is narrowly tailored, supported by cause, and will not prejudice any party in interest. Rather, the relief sought will ensure that the Debtor can fulfill its fiduciary duties by completing its investigation and determining which claims should be pursued for the benefit of the estate and its creditors.

RELIEF REQUESTED

5. Pursuant to sections 108, 546, and 549 of the Bankruptcy Code and Bankruptcy Rule 9006, the Debtor seeks entry of an order (the “**Proposed Order**”), substantially in the form attached hereto, extending the deadline to commence estate claims (the “**Estate Claims**”), including causes of action under chapter 5 of the Bankruptcy Code (the “**Avoidance Actions**”), (a) by 90 days, from August 19, 2026, to November 17, 2026, to the extent governed by sections 108(a) and 546(a), and (b) by 90 days for actions governed by section 549(d) of the Bankruptcy Code relating to post-petition transfers.

JURISDICTION AND VENUE

6. The United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

7. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

8. On July 23, 2024 (the “**Involuntary Petition Date**”), Axis Energy Services, LLC, DOC Energy Services, Inc., Cudd Pressure Control, Inc., Thru Tubing Solutions, Inc., Genesis Fluids, LLC, and Force Pressure Control, LLC (collectively, the “**Petitioning Creditors**”) filed an involuntary petition under chapter 7 of the Bankruptcy Code (the “**Involuntary Petition**”).

9. On August 19, 2024 (the “**Voluntary Petition Date**”), the Debtor consented to an order for relief by filing its voluntary petition under chapter 11 of the Bankruptcy Code (the “**Voluntary Petition**”). During the period between the Involuntary Petition Date and the Voluntary Petition Date (the “**Gap Period**”), the Debtor operated its business in the ordinary course of business pursuant to section 303(f) of the Bankruptcy Code at the direction of James A. Katchadurian, the Debtor’s Chief Restructuring Officer (the “**CRO**”). The Debtor continues to manage and operate its business as debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

10. As further described below, this Bankruptcy Case has been unusually complex from its inception and has required the Debtor to address a series of interrelated operational, transactional, and litigation challenges, many of which stem from significant prepetition mismanagement. These challenges continue to demand substantial attention from the Debtor and its CRO.

A. The Ongoing Investigation

11. Shortly after the Voluntary Petition Date, the Debtor, through its CRO, commenced an extensive investigation into the Debtor’s operations and assets. As described in the Debtors’ *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay or Apply Payments Attributable to Mineral Interests in the Ordinary Course and (II) Granting Related Relief* (the “**Mineral Interests Payment Motion**”) [Docket No. 61], the Debtor’s business involves numerous, highly complex mineral interests, including royalty interests, overriding royalty interests, and working interests. The Debtor filed the Mineral Interests Payment Motion to maintain the status quo and continue making payments from revenue derived from the mineral interests.

12. The Debtor's investigation uncovered a significant title issue relating to the mineral interests whereby certain conveyances of the working interests or overriding royalty interests were not properly documented and/or recorded. These deficiencies have created persistent uncertainty regarding ownership interests and rights, requiring ongoing, resource-intensive analysis and resolution efforts.³

13. Notably, the *Final Order (I) Authorizing the Debtor to Pay or Apply Payments Attributing to Mineral Interests in the Ordinary Course and (II) Granting Related Relief* [Docket No. 237] preserves the Debtor's ability to avoid and recover payments as unauthorized postpetition transfers. Thus, to the extent it is determined that the recipient of a mineral interest payment did not hold a valid working interest or overriding royalty interest, such payment would not be authorized for purposes of section 549 of the Bankruptcy Code.⁴

14. The CRO has identified certain potential causes of action it will pursue, but the investigation remains ongoing. Although the Debtor has been working to finalize and file the Estate Claims and Avoidance Actions as soon as reasonably practicable, several critical matters have arisen throughout the Bankruptcy Case that have prevented the Debtor from focusing exclusively on the investigation.

B. The Contentious Sale Process

15. A key component of the Bankruptcy Case has been the approval of the sale of the Debtor's assets (the "Sale"), which maximized the value of the assets but was highly contested.⁵

³ Nothing herein shall be deemed an admission, waiver, or concession by the Debtor as to the nature, extent, validity, priority, or ownership of any interests or rights, all of which are expressly reserved.

⁴ See *id.*, ¶ 11.

⁵ See *NETX's Initial Limited Objection to Emergency Consideration of Debtor's Sale Motion* [Docket No. 931]; *Response of Raymond Kasino and Lawanda Turner to Debtor's Emergency Motion for Entry of an Order (I)*

Following extensive marketing efforts, a competitive auction conducted pursuant to Court-approved bidding procedures, and significant negotiation efforts, the Court entered the Sale Order on November 19, 2025, which approved the sale of the majority of the Debtor's assets to TexOil Investments, LLC and its assignee TexOil ET, LLC (collectively, "**TexOil**").⁶

16. The Debtor and its professionals devoted a significant amount of time and attention to the Sale and its attendant demands. Pursuant to the Sale Order, which reflects negotiations between the Debtor and Middleton Oil Company ("**Middleton Oil**"), the Ad Hoc Group of Non-Operating Working Interest Owners (the "**WIO Ad Hoc Group**", and BMW Investments, LP ("**BMW**"), the parties propounded extensive discovery requests on the Debtor on December 1, 2025 (the "**2025 WIO Discovery**").⁷ The Debtor collected and reviewed a substantial volume of

Approving the Sale of the Substantial Majority of the Debtor's Assets to TexOil Investments, LLC (II) Authorizing the Debtor to Enter into the TexOil Asset Purchase Agreements, (III) Approving the Sale of the Assets Free and Clear of Claims, Liens, Interests, and Encumbrances, (IV) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases as Set Forth in the TexOil Asset Purchase Agreements and (V) Granting Related Relief [Docket No. 944]; Middleton Oil Company's Limited Objection to Sale of Assets to TexOil [Docket No. 946]; Journeys End Petroleum LLC and Pondegrossa Trust's Limited Objection to Debtor's Sale of Assets to TexOil Investments, LLC [Docket No. 947]; The Angie Carr Brown Trust's and Kenneth W. Brown Testamentary Trust's Limited Objection to Debtor's Emergency Motion for Entry of an Order (I) Approving the Sale of the Substantial Majority of the Debtor's Assets to TexOil Investments, LLC (II) Authorizing the Debtor to Enter into the TexOil Asset Purchase Agreements, (III) Approving the Sale of the Assets Free and Clear of Claims, Liens, Interests, and Encumbrances, (IV) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases as Set Forth in the TexOil Asset Purchase Agreements and (V) Granting Related Relief [Docket No. 948]; BMW Investments, L.P.'s Limited Objection to Debtor's Emergency Motion to Approve Sale of Assets to TexOil [Docket No. 949]; Limited Objection of the Ad Hoc Group of Partnership Claimants to the Debtor's Proposed Sale of Certain Assets to TexOil Investments, LLC [Docket No. 950]; NETX's Objection and Reservation of Rights to Debtor's Motion to Approve Sale of Assets Under 11 U.S.C. § 363 [Docket No. 952]; The Ad Hoc Group of Non-Operating Working Interest Owners' Joinder to Middleton Oil Company's Limited Objection to Debtor's Sale of Assets to TexOil [Docket No. 958].

⁶ See Order Granting Debtor's Emergency Motion for Entry of an Order (I) Approving the Sale of the Substantial Majority of the Debtor's Assets to TexOil Investments, LLC (II) Authorizing the Debtor to Enter Into the TexOil Asset Purchase Agreements, (III) Approving the Sale of the Assets Free and Clear of Claims, Liens, Interests, and Encumbrances, (IV) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases as Set Forth in the TexOil Asset Purchase Agreements, and (V) Granting Related Relief [Docket No. 972] (the "**Sale Order**").

⁷ See *id.*, ¶ 27.

documents by January 16, 2026 under tight timelines, and continued producing documents as a result of discovery disputes with Middleton Oil.

17. At the same time and following the 2025 WIO Discovery, the Debtor continued to negotiate with TexOil and other stakeholders to resolve issues necessary to consummate the transaction. The Sale ultimately closed on May 1, 2020.⁸ Although the closing alleviated certain burdens, the Debtor and the CRO remain heavily engaged in addressing post-closing obligations.

C. The Plan Process and Efforts to Resolve Claims

18. Throughout the Sale process, the Debtor simultaneously was working to propose a chapter 11 plan. Along the way, to streamline the claims resolution process, the Debtor filed its *Motion for Entry of an Order (I) Authorizing and Approving Procedures for Settling Causes of Action Related to the TexOil Asset Purchase Agreements for Lot 2 and (II) Granting Related Relief* [Docket No. 1008], which the Court approved on January 28, 2026.⁹ Pursuant to the Settlement Procedures Order, the Debtor negotiated with several parties, including purported working interest owners and TexOil, to resolve significant claims.¹⁰

19. In addition, the Debtor filed its *Emergency Motion to Approve Compromise and Settlements by and among the Debtor, TexOil Investments, LLC, TexOil ET, LLC, and Settling Purported Working Interest Owners Pursuant to Fed. R. Bankr. P. 9019(A)* [Docket No. 1173]

⁸ See *Notice of Sale Closing and Deadline for Filing Rejection Damages Claims* [Docket No. 1177].

⁹ See *Order Granting Debtor's Motion for Entry of an Order (I) Authorizing and Approving Procedures for Settling Causes of Action Related to the TexOil Asset Purchase Agreements for Lot 2 and (II) Granting Related Relief* [Docket No. 1055] (the "**Settlement Procedures Order**").

¹⁰ See *Notice of Settlements by and among the Debtor, TexOil Investments, LLC, TexOil ET, LLC, and Settling Purported Working Interest Owners Pursuant to the Settlement Procedures Order* [Docket No. 1182].

(the “**9019 Motion**”), seeking the Court’s approval of additional settlement agreements. On May 7, 2026, the Court granted the Debtor’s 9019 Motion.¹¹

20. Notwithstanding the Debtor’s diligent efforts, the complexity of the issues in the Bankruptcy Case has delayed the plan process. Throughout the Bankruptcy Case, the Debtor has filed five motions to extend the Debtor’s exclusivity to file a chapter 11 plan (collectively, the “**Exclusivity Motions**”).¹² The Exclusivity Motions detail the ongoing challenges and hurdles the Debtor has encountered.

21. Although the Debtor ultimately filed the *Chapter 11 Plan of Liquidation of Barrow Shaver Resources Company, LLC* [Docket No. 1087] (the “**Plan**”) on February 19, 2026, the Debtor is continuing to revise and refine the Plan and related documents to address issues raised by various stakeholders.

D. Extensive Litigation

i. Adversary Proceedings

22. The Debtor also is a party to numerous adversary proceedings pending before this Court that have required substantial litigation resources and attention from the CRO, including, but not limited to, the following:

¹¹ See *Order Granting Debtor’s Emergency Motion to Approve Compromise and Settlements by and among the Debtor, TexOil Investments, LLC, TexOil ET, LLC, and Settling Purported Working Interest Owners Pursuant to Fed. R. Bankr. P. 9019(A)* [Docket No. 1200].

¹² See *Motion for Entry of an Order Extending Its Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 368]; *Second Motion for Entry of an Order Extending Its Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 528]; *Third Motion for Entry of an Order Extending Its Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 761]; *Fourth Motion for Entry of an Order Extending Its Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 851]; *Fifth Motion for Entry of an Order Extending Its Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 1040]. The Debtor incorporates by reference the arguments set forth in the Exclusivity Motions.

- *Barrow Shaver Resources Company LLC v. SDS Petroleum Consultants LLC*, Adv. No. 24-103178 (the “**SDS Adversary**”);
- *Kasino et al. v. Barrow Shaver Resources Company LLC*, Adv. No. 25-03440 (the “**Kasino Adversary**”);
- *0078HT et al. v. Barrow Shaver Resources Company LLC*, Adv. No. 25-03618 (the “**WIO Ad Hoc Group Adversary**”);
- *Cactus Wellhead, LLC et al. v. Barrow Shaver Resources Company LLC*, Adv. No. 25-03797 (the “**Cactus Wellhead Adversary**”);
- *Brown Trust et al. v. Barrow Shaver Resources Company LLC*, Adv. No. 26-03126 (the “**Brown Trust Adversary**”); and
- *Middleton Oil Company v. TexOil Investments, LLC et al.*, Adv. Case No. 26-03146 (the “**Middleton Adversary**”).

The Brown Trust Adversary was recently filed on April 15, 2026, and the Middleton Adversary was filed on May 4, 2026.

ii. NETX District Court Litigation

23. Meanwhile, on February 28, 2026, the automatic stay was lifted with respect to multiple proceedings involving NETX Acquisitions, LLC, and/or ETX Minerals, LLC (collectively, “**NETX**”) pursuant to the *Stipulation and Agreed Order Regarding NETX Lift Stay Motion* [Docket No. 971] (the “**NETX Stipulation**”).¹³ As such, the Debtor is actively litigating the following proceedings with NETX in the U.S. District Court for the Eastern District of Texas:

- *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00934;
- *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00935;
- *NETX Acquisitions, LLC, et al. v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00936;

¹³ The Debtor agreed to the NETX Stipulation to resolve NETX’s objection and facilitate the entry of the Sale Order.

- *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00937;
- *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00938;
- *NETX Acquisitions, LLC, et al. v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00939

(collectively, the “**NETX District Court Litigation**”).¹⁴

iii. Contested Matters

24. The Debtor also is litigating several contested matters. On April 8, 2026, Middleton Oil filed its *Application for Allowance and Payment of Administrative Expense Claims* [Docket No. 1148] (the “**Administrative Expense Application**”), to which the Debtor objected.¹⁵ The Administrative Expense Application has generated substantial discovery and ultimately required the Debtor to seek a protective order limiting the scope of Middleton Oil’s deposition notices.¹⁶ The CRO’s deposition nevertheless proceeded on May 29, 2026.

25. On June 3, 2026, two days before the scheduled hearing on the Administrative Expense Application, Middleton Oil filed its *Emergency Motion to Continue Hearing on Administrative Claim* [Docket No. 1257] (the “**Continuance Motion**”). The Debtor promptly

¹⁴ The NETX District Court Litigation is currently consolidated under *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 24-cv-00934. The Debtor also is involved in a related appeal in the Court of Appeals for the Sixth District of Texas: *NETX Acquisitions, LLC v. Barrow Shaver Resources Company, LLC, et al.*, Case No. 06-24-00058 (the “**NETX Appeal**”).

¹⁵ *Objection to Middleton Oil Company’s Application for Allowance and Payment of Administrative Expense Claims* [Docket No. 1169].

¹⁶ *Emergency Motion for (I) a Protective Order Barring the (A) Middleton Oil Company’s Notice of 30(b)(6) Deposition of Barrow Shaver Resources Company, LLC and (B) Middleton Oil Company’s Notice of Deposition of James A. Katchadurian or Alternatively (II) Limiting Discovery* [Docket No. 1212].

objected, noting that prolonging the litigation of Middleton Oil’s claims would divert time and resources better devoted to finalizing the Plan.¹⁷ On June 4, 2026, the Court heard the Continuance Motion and, given the parties’ disagreement on key issues, continued the hearing on the Administrative Expense Application to a date to be agreed upon.¹⁸

26. While the Debtor is litigating the Administrative Expense Application, it is also engaged in contested matters involving the Ad Hoc Group of Partnership Claimants (the “**Partnership Ad Hoc Group**”) related to BSR Lone Star Drilling Fund I LP and BSR Lone Star Opportunity Zone Fund I LP (collectively, the “**Retail Funds**”). On March 13, 2026, the Partnership Ad Hoc Group filed its *Motion to Compel the Debtor to (I) Perform Its Obligations Under Agreements with the Retail Funds and (II) Comply with Its Duties to the Retail Funds Under Applicable Law* [Docket No. 1112] (the “**Motion to Compel**”). As an indirect response, the Debtor filed its *Emergency Motion for Authority to Abandon Membership Interest* [Docket No. 1124] (the “**Abandonment Motion**”). Both the Debtor and the Partnership Ad Hoc Group have filed direct objections to the Motion to Compel and the Abandonment Motion, respectively.¹⁹ These disputes have required additional discovery, including extensive document review and production efforts. The Debtor is reviewing over 20,000 documents in connection with these contested matters, while

¹⁷ See *Debtor’s Objection to Middleton Oil Company’s Emergency Motion to Continue Hearing on Administrative Claim* [Docket No. 1263, ¶ 5] (“Middleton Oil should not be permitted to continue to bleed the Debtor of time and resources that are better spent coming to a global resolution (whether consensually or through cramdown) for all parties through a chapter 11 plan.”).

¹⁸ Although the Debtor and Middleton Oil are discussing a new hearing date for the Administrative Expense Application, the Debtor anticipates that the hearing will occur in July.

¹⁹ See *Objection to Motion to Compel the Debtor to (I) Perform Its Obligations Under Agreements with the Retail Funds and (II) Comply with Its Duties to the Retail Funds Under Applicable Law* [Docket No. 1154]; see *Objection to Debtor’s Emergency Motion for Authority to Abandon Membership Interest* [Docket No. 1155].

preparing the CRO for yet another deposition that is scheduled for June 29, 2026. Moreover, the Debtor anticipates this dispute will result in another adversary proceeding.

27. As detailed above, the Debtor and the CRO have devoted significant and sustained attention to litigation, discovery, and case administration efforts in various adversary proceedings, lawsuits, and contested matters. These ongoing obligations, along with the Debtor's efforts in connection with the Sale and plan negotiations, have constrained the Debtor's ability to devote its full attention to the investigation of the Estate Claims and Avoidance Actions.

BASIS FOR RELIEF

28. Pursuant to section 546(a)(1) of the Bankruptcy Code, an action or proceeding under sections 544, 545, 547, 548, or 553 must be commenced before the later of:

- (A) 2 years after the entry of the order for relief; or
- (B) 1 year after the appointment or election of the first trustee under section 702, 1104, 1163, 1202, or 1302 of this title if such appointment or such election occurs before the expiration of the period specified in subparagraph (A).²⁰

Causes of action under section 549 of the Bankruptcy Code must be brought within two years of specific transfers.²¹ Likewise, section 108(a) of the Bankruptcy Code provides that, with respect to estate claims, if the applicable limitation period has not yet expired as of the petition date, the trustee may commence the action within two years after the order for relief.²²

²⁰ 11 U.S.C. § 546(a).

²¹ See 11 U.S.C. § 549(d)(1).

²² 11 U.S.C. § 108(a). Further, pursuant to section 1107(a) of the Bankruptcy Code, the Debtor (as debtor in possession) exercises the rights of a trustee. See 11 U.S.C. § 1107(a).

29. Here, the Debtor consented to an order for relief by filing the Voluntary Petition on August 19, 2024.²³ The Court subsequently confirmed that the Debtor's Voluntary Petition constitutes an order for relief under chapter 11.²⁴ Thus, the two-year period under sections 546(a) and 108(a) of the Bankruptcy Code expires on August 19, 2026. The post-petition transfers of which the Debtor is aware at this time would result in a filing deadline range from August 19, 2026 to December 19, 2027.

30. Section 546(a) of the Bankruptcy Code operates as a statute of limitations, not a jurisdictional bar.²⁵ As such, the deadline to file the Estate Claims and the Avoidance Actions can be extended.²⁶ Courts also have extended the period for commencing actions under sections 108(a) and section 549(d) of the Bankruptcy Code in appropriate circumstances.²⁷

²³ See *Notice of Filing Voluntary Chapter 11 Petition* [Docket No. 46].

²⁴ See *Order Granting Debtor's Emergency Motion and Converting Case to Chapter 11* [Docket No. 49].

²⁵ See *McFarland v. Leyh (In re Tex. Gen. Petro. Corp.)*, 52 F.3d 1330, 1337-38 (5th Cir. 1995).

²⁶ See *Morton v. Kievit (In re Vallecito Gas, LLC)*, 461 B.R. 358, 397 (Bankr. N.D. Tex. 2011) (noting that a statute of limitations can be waived, subject to equitable tolling, and can be extended, while a time limit that is jurisdictional "cannot be waived or extended by the parties or the court"); see also *In re Uplift RX, LLC*, Case No. 17-32186 (MI), *Order Granting Debtors' Expedited Motion to Extend Time to File Avoidance Actions*, Docket No. 1005 (Bankr. S.D. Tex. Mar. 28, 2019); *In re BMI Oldco Inc.*, Case No. 23-90794 (MI), *Order Extending Time to File Estate Claims and Avoidance Actions*, Docket No. 1758 (Bankr. S.D. Tex. Oct. 2, 2025). Courts in other circuits have reached the same conclusion. See *IBT Int'l, Inc. v. N. (In re Int'l Admin. Servs.)*, 408 F.3d 689, 699-701 (11th Cir. 2005) (holding that section 546 is a statute of limitations that does not contain a jurisdictional bar and concluding that the bankruptcy court did indeed extend the limitations period pursuant to section 546(a)); *Frentz v. Stites & Harbison (In re ThermoViews Indus.)*, 381 B.R. 225, 229 (Bankr. W.D. Ky. 2008) (noting that "the bankruptcy court has the discretion to extend the [§ 546] deadlines in appropriate circumstances").

Some courts have recognized that the deadline under section 546(a) of the Bankruptcy Code can be extended for "cause." See *In re Fundamental Long Term Care, Inc.*, 501 B.R. 784, 787-89 (Bankr. M.D. Fla. 2013) (noting that "[t]here is no question the Court has the authority to enlarge the two-year limitation period under section 546(a)" pursuant to Bankruptcy Rule 9006 and concluding that "cause" was met for purposes of enlarging the two-year limitations period under sections 108(a) and 546(a) of the Bankruptcy Code).

²⁷ *In re Kwok*, No. 22-50073, 2024 Bankr. LEXIS 369, *27 (Bankr. Dist. Conn. Feb 15, 2024) (holding that Bankruptcy Rule 9006(b) provides a mechanism for extending statutes of limitations set forth in sections 108(a), 546(a), and

31. Here, cause exists to extend the deadlines under sections 108(a), 546(a), and 549(d) of the Bankruptcy Code. This Bankruptcy Case has been exceptionally complex since its inception. As set forth above, the Debtor has been required to devote substantial time and resources to, among other things: (i) conducting a highly contested Sale and completing post-closing action items; (ii) drafting the Plan and related documents; and (iii) litigating numerous adversary proceedings, district court lawsuits, and contested matters.

32. The Debtor recognizes the complex and contentious nature of the Bankruptcy Case and has worked diligently to manage competing demands, directing its resources toward the high-priority matters described above. Now that the Sale has closed and the Plan is progressing toward confirmation, the Debtor is better positioned to finalize its investigation and pursue the Estate Claims and Avoidance Actions. However, given the breadth of remaining issues and ongoing litigation, the Debtor requests an extension of the deadline to commence such actions.

WHEREFORE, the Debtor respectfully requests entry of the Proposed Order, expressly enlarging the time periods under sections 108(a), 546(a), and 549(d) of the Bankruptcy Code to file the Estate Claims and Avoidance Actions, and such other and further relief as the Court may deem just and appropriate.

[Signature Page Follows]

549(d) of the Bankruptcy Code); *see also McFarland*, 52 F.3d at 1338 (recognizing that section 549(d) is analogous to section 546(a) and likewise constitutes a statute of limitations).

Dated: June 5, 2026

Respectfully Submitted,

/s/ Joseph E. Bain

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Counsel to the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

I certify that on June 5, 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 on those parties required to receive service pursuant to the Bankruptcy Rules and that I caused a copy of the foregoing document to be served on the Debtor's Mailing Matrix by the Debtor's noticing agent, who will file an affidavit of service reflecting the same.

/s/ Joseph E. Bain

Joseph E. Bain

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

In re:	§	
	§	Chapter 11
	§	
Barrow Shaver Resources Company LLC ¹	§	Case No. 24-33353
	§	
	§	
Debtor.	§	

**ORDER GRANTING MOTION TO EXTEND DEADLINE TO FILE
ESTATE CLAIMS AND AVOIDANCE ACTIONS**

Upon consideration of the Debtor’s *Motion to Extend Deadline to File Estate Claims and Avoidance Actions* (the “**Motion**”)² pursuant to Bankruptcy Rule 9006 and sections 108(a), 546(a), and 549(d) of the Bankruptcy Code, as more fully set forth in the Motion; this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; this Court having found that due and proper notice of the Motion was provided and that such notice was adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; this Court having reviewed the Motion; upon any hearing held on the Motion; all objections, if any, to the Motion having been withdrawn, resolved, or overruled; this Court having determined that the legal and factual bases set forth in the Motion

¹ The last four digits of the Debtor’s federal tax identification number are 0510. The Debtor’s corporate headquarters is located at 977 Pruitt Place, Tyler, TX 75703. All pleadings, as well as additional information related to the administration of the above-captioned bankruptcy case, are accessible free of charge on the case website at the following link: <https://cases.ra.kroll.com/BSR/>.

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

establish just cause for the relief granted herein; 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 deadline under 11 U.S.C. §§ 108(a) and 546(a) for the Debtor to file the Estate Claims and Avoidance Actions is hereby extended by 90 days, through and including November 17, 2026.

2. The deadlines under 11 U.S.C. § 549(d) for the Debtor to commence Avoidance Actions based on post-petition transfers are hereby extended by 90 days.

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

4. Notice of the Motion shall be deemed good and sufficient, and the applicable requirements of the Federal Rules of Bankruptcy Procedure and the Bankruptcy Local Rules for the Southern District of Texas are satisfied by such notice.

5. The Debtor is authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

6. 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

THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE