

Davor Rukavina, Esq.
Texas Bar No. 24030781
Thomas D. Berghman, Esq.
Texas Bar No. 24082683
Garrrick C. Smith, Esq.
Texas Bar No. 24088435
MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard St., Ste. 4000
Dallas, TX 75201
Telephone: (214) 855-7500
E-mail: drukavina@munsch.com
tberghman@munsch.com
gsmith@munsch.com

Hudson M. Jobe
Texas Bar No. 24041189
JOBE LAW PLLC
6060 North Central Expressway, Suite 500
Dallas, TX 75206
(214) 807-0563
hjobe@jobelawpllc.com

COUNSEL TO O'RYAN RANCHES, LTD.

COUNSEL TO THE OIL AND GAS DEBTORS
AND THE OREGON DEBTORS

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

In re:	§	Chapter 11
	§	
SCANROCK OIL & GAS, INC., <i>et al.</i> ,	§	Case No. 25-90001-mxm11
	§	
Debtors. ¹	§	Jointly Administered

MOTION TO SUBSTITUTE COUNSEL FOR THE REORGANIZED DEBTORS

TO THE HONORABLE MARK X. MULLIN, U.S. BANKRUPTCY JUDGE:

The reorganized debtors (“Reorganized Debtors”) in the above-captioned jointly administered chapter 11 bankruptcy cases (“Cases”) file this *Motion to Substitute Counsel for the Reorganized Debtors* (the “Motion”), and, in support, respectfully state:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: Scanrock Oil & Gas, Inc. (0380); EON Production, LLC (0136); O’Ryan Family Limited Partnership (1913); O’Ryan Production & Exploration Ltd. (9950); O’Ryan Ponderosa, LLC (1476); Ryan C. Hoerauf, Inc. (0493); and Smackover Oil Treaters, Ltd. (9529); O’Ryan Ranches, Ltd. (7184); O’Ryan Ranches, LLC (6467); and O’Ryan Oregon Ranches, LLC. The location of the Debtors’ service address is 8180 Lakeview Center, Ste. 300, Odessa, TX 79765. More information about the Debtors, and copies of pleadings in the above-captioned bankruptcy case, may be obtained on the website of the Debtors’ noticing agent, Stretto, Inc., at: <https://cases.stretto.com/scanrock>.

I. PROCEDURAL HISTORY

1. On February 3, 2025, Scanrock Oil & Gas, Inc. (“Scanrock”) and O’Ryan Ranches, Ltd. filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division.

2. On February 9, 2025, EON Production, LLC; O’Ryan Family Limited Partnership; O’Ryan Production & Exploration, Ltd.; O’Ryan Ponderosa, LLC; Ryan C. Hoerauf, Inc.; and Smackover Oil Treaters Ltd. (together with Scanrock, the “Oil and Gas Debtors” or “O&G Debtors”) filed for chapter 11 in this Court for all of the Debtors to be jointly administered. On February 14, 2025, the *Order Directing Joint Administration of the Chapter 11 Cases* [Docket No. 46] was entered, providing for the joint administration of these Cases under the lead case Scanrock Oil & Gas, Inc., Case No. 25-90001-mxm11 (the “Lead Case”). O’Ryan Oregon Ranches, LLC and O’Ryan Ranches, LLC (the “Oregon Debtors”) filed for chapter 11 on April 25, 2025, in order to be jointly administered with these Cases. On May 1, 2025, the *Second Order Directing Joint Administration* [Docket No. 299] was entered, providing for the joint administration of the Oregon Debtors in the Lead Case.

3. On March 4, 2025, the Oil and Gas Debtors’ *Application to Employ Munsch Hardt Kopf & Harr, P.C. as Attorneys for the Oil and Gas Debtors Effective as of the Petition Date* [Docket No. 96] (“MHKH First Retention Application”) was filed, seeking, among other things, to employ and retain Munsch Hardt to serve as general bankruptcy counsel to the Oil and Gas Debtors. On the same date, O’Ryan Ranches, Ltd. filed its *Application to Employ Jobe Law PLLC as Attorneys for O’Ryan Ranches, Ltd. Effective as of the Petition Date* [Docket No. 104] (“Jobe Law PLLC Retention Application”), seeking, among other things, to employ and retain Jobe Law PLLC to serve as general bankruptcy counsel to O’Ryan Ranches, Ltd.

4. On April 17, 2025, the Court signed and entered the *Order Authorizing the Debtors' Employment of Munsch Hardt Kopf & Harr, P.C. as Attorneys to the Oil and Gas Debtors Effective as of the Petition Date* [Docket No. 251].

5. On May 5, 2025, the Court signed and entered the *Order Authorizing the Employment of Jobe Law PLLC as Attorneys for O'Ryan Ranches, Ltd. Effective as of the Petition Date* [Docket No. 302].

6. On May 13, 2025, the *Application to Employ Munsch Hardt Kopf & Harr, P.C. as Attorneys for the Oregon Debtors Effective as of the Petition Date* [Docket No. 325] ("MHKH Second Retention Application") was filed in these Chapter 11 Cases. On June 12, 2025, the Court signed the *Order Authorizing the Debtors' Employment of Munsch Hardt Kopf & Harr, P.C. as Attorneys to the Oregon Debtors Effective as of the Petition Date* [Docket No. 393].

7. On September 8, 2025, the Court entered the *Amended Order Confirming the Debtors' Amended Joint Consolidated Plan of Reorganization* [Docket No. 541] (the "Confirmation Order").

8. On September 22, 2025, the Debtors filed the *Notice of Effective Date and Plan Deadlines* [Docket No. 548], advising that the Effective Date of the Plan occurred on September 20, 2025, and advising of related dates and deadlines applicable pursuant to the Plan.

9. On October 31, 2025, attorneys J. Mark Chevallier and Bryan Rochelle of Rochelle McCullough, LLP entered Notices of Appearances for the Reorganized Debtors at Docket Nos. 578 and 579.

II. RELIEF REQUESTED

10. By this Motion, the Reorganized Debtors seek entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), authorizing the withdrawal of

Munsch Hardt Kopf & Harr, P.C. and Jobe Law PLLC and substitution of Rochelle McCullough, LLP as counsel of record for the Reorganized Debtors.

11. The Debtors' Plan has been confirmed, the Confirmation Order is final and non-appealable, the Effective Date of the Debtor's Plan has occurred, and replacement counsel for the Reorganized Debtors have been retained and entered appearances in these Cases. Substitution of counsel of record for the Reorganized Debtors at this juncture presents no opportunity for delay nor prejudice to any party-in-interest.

III. CONCLUSION & PRAYER

WHEREFORE, PREMISES CONSIDERED, the Reorganized Debtors respectfully request entry of the Proposed Order authorizing the withdrawal of Munsch Hardt Kopf & Harr, P.C. and Jobe Law PLLC and substitution of Rochelle McCullough, LLP as their counsel of record, and granting the Reorganized Debtors all other and further relief, at law or in equity, to which they may be entitled.

RESPECTFULLY SUBMITTED on November 5, 2025.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Garrick C. Smith

Davor Rukavina, Esq.
Texas Bar No. 24030781
Thomas D. Berghman, Esq.
Texas Bar No. 24082683
Garrick C. Smith, Esq.
Texas Bar No. 24088435
Jonathan S. Petree
Texas Bar No. 24116897
500 N. Akard Street, Suite 4000
Dallas, Texas 75201
Telephone: (214) 855-7500
E-mail: drukavina@munsch.com
E-mail: tberghman@munsch.com
E-mail: gsmith@munsch.com
E-mail: jpetree@munsch.com

**COUNSEL TO THE OIL AND GAS DEBTORS
AND THE OREGON DEBTORS**

- and -

JOBE LAW PLLC

By: /s/ Hudson M. Jobe

Hudson M. Jobe
Texas Bar No. 24041189
6060 North Central Expressway, Suite 500
Dallas, TX 75206
(214) 807-0563
hjobe@jobelawpllc.com

COUNSEL TO O'RYAN RANCHES, LTD.

CERTIFICATE OF SERVICE

I certify that, on November 5, 2025, 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 Northern District of Texas.

By: /s/ Jonathan S. Petree

Jonathan S. Petree

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

In re:	§	Chapter 11
	§	
SCANROCK OIL & GAS, INC., <i>et al.</i> ,	§	Case No. 25-90001-mxm11
	§	
Debtors. ¹	§	Jointly Administered

**ORDER GRANTING THE MOTION TO
SUBSTITUTE COUNSEL FOR THE REORGANIZED DEBTORS**

Before the Court is the *Motion to Substitute Counsel for the Reorganized Debtors* (the “Motion”), filed by the debtors and debtors-in-possession (the “Reorganized Debtors”) in the above-captioned, jointly administered chapter 11 bankruptcy cases (the “Cases”). By the Motion, the Reorganized Debtors seek entry of this Order authorizing the withdrawal of Munsch Hardt

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Kopf & Harr, P.C. and Jobe Law PLLC and substitution of Rochelle McCullough, LLP as counsel of record for the Reorganized Debtors. Having considered the Motion, and the record and docket of the Cases, the Court finds that: (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334; (ii) the Motion constitutes a core proceeding pursuant to 28 U.S.C. § 157(b); (iii) the relief requested in the Motion is in the best interests of the Debtors' and their estates, their creditors, and other parties-in-interest; and (iv) good and sufficient cause exists for approving the relief requested in the Motion.

Accordingly, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The law firm and counsel identified below are hereby substituted as counsel of record for the Reorganized Debtors:

J. Mark Chevallier
State Bar No. 04189170
Bryan L. Rochelle
State Bar No. 24107979
ROCHELLE MCCULLOUGH, LLP
901 Main Street, Suite 3200
Dallas, Texas 75202
Telephone: (214) 953-0182
Facsimile: (888) 467-5979
Email: mchevallier@romclaw.com
Email: bryan.rochelle@romclaw.com

3. Munsch Hardt Kopf & Harr, P.C. and Jobe Law PLLC are hereby withdrawn as counsel of record for the Reorganized Debtors and are hereby discharged of any further duties as counsel of record in these Cases.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this order.

END OF ORDER