

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

In re: AXIP ENERGY SERVICES, LP, et al., Debtors.¹	§ § § § § §	Case No. 26-90338 (CML) (Chapter 11) (Jointly Administered)
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**PLAN ADMINISTRATOR’S MOTION FOR ENTRY OF
FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES**

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.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Ankura Trust Company, LLC, solely in its capacity as the Plan Administrator² of the Post-Sale Estates of the above-captioned debtors, files this motion seeking entry of a final decree (the “*Motion*”), substantially in the form attached hereto (the “*Final Decree*”) and in support respectfully submits the following:

RELIEF REQUESTED

1. Other than with respect to (a) the case of Axip Energy Services, LP (the “*Remaining Debtor*”), *In re Axip Energy Services, LP*, Case No. 26-90338 (the “*Remaining*

¹ The Debtors in these Chapter 11 Cases and the last four digits of their respective federal tax identification numbers are: Axip Energy Services, LP (9220); Axip Energy Services Management, LLC (9986); Axip Holdings, LLC (6302); Axip Leasing Company, LLC (5678); Axip Producer Services - Marcellus I, LLC (3312); Axip Producer Services, LLC (4792); and E3 Compression Holdings LLC (0825). The Debtors’ service address is: 15814 Champion Forest Dr, #310, Spring, TX 77379. As used herein, “*Debtors*” means, prior to the Effective Date, the above-captioned debtors and debtors in possession.

² Capitalized terms used but not otherwise defined in this Motion shall have the meanings set forth in the Plan or the Confirmation Order, as applicable (each as defined herein).

Case,” and the Chapter 11 Cases being closed referred to herein as the “*Affiliate Cases*”) and (b) the Claims Reconciliation (defined below) and certain administrative or ministerial tasks in the Affiliate Cases, each of the Chapter 11 Cases has been fully administered, and the Plan has been substantially consummated. Leaving the Affiliate Cases open would impose unnecessary costs on the Post-Sale Estates. Accordingly, the Plan Administrator requests entry of the Final Decree closing the Affiliate Cases.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “*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). Through the Plan Administrator, the Post-Sale Estates confirm their consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are section 350 of title 11 of the United States Code (the “*Bankruptcy Code*”), Bankruptcy Rule 3022, rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “*Local Rules*”), and the Procedures for Complex Cases in the Southern District of Texas (the “*Complex Case Procedures*”).

BACKGROUND

5. On February 22, 2026 (the “*Petition Date*”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court commencing the above-captioned cases (the “*Chapter 11 Cases*”). Additional information regarding the Debtors and these

Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the *Declaration of Ben Chesters in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 17] (the “**First Day Declaration**”), filed on the Petition Date and incorporated herein by reference.

6. On February 23, 2026, the Court entered the *Order Directing Joint Administration of the Debtors’ Chapter 11 Cases* [Docket No. 28] (the “**Joint Administration Order**”). The Affiliate Cases and the corresponding Debtors (the “**Affiliate Debtors**”) are as follows:

	Debtor	Case No.
1	Axip Leasing Company, LLC	26-90337
2	E3 Compression Holdings LLC	26-90339
3	Axip Energy Services Management, LLC	26-90340
4	Axip Producer Services, LLC	26-90341
5	Axip Producer Services – Marcellus I, LLC	26-90342
6	Axip Holdings, LLC	26-90343

7. On June 22, 2026, the Court entered the *Findings of Fact, Conclusions of Law, and Order Granting Final Approval of Disclosure Statement and Confirming Plan of Liquidation of Axip Energy Services LP and its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 413] (the “**Confirmation Order**”) confirming the *Debtors’ Combined Disclosure Statement and Chapter 11 Plan of Liquidation* [Docket No. 357] (as amended, supplemented, or otherwise modified from time to time, the “**Plan**”). The Effective Date of the Plan occurred on June 25, 2026. See Docket No. 428.

8. Pursuant to the Plan, the Plan Administrator is responsible for, among other things, implementing the Plan, administering and monetizing remaining assets of the Post-Sale Estates,

reconciling claims (the “***Claims Reconciliation***”), making distributions to Holders of Allowed Claims, and winding up and dissolving the Debtors in accordance with the Plan. Except with respect to the Claims Reconciliation and certain administrative or ministerial tasks related to the Debtors in the Affiliate Cases, the Plan Administrator submits that the Affiliate Cases are fully administered. To the extent that any matters or proceedings subsequently arise in respect of the Affiliate Cases (such as any reporting requirements, administrative or ministerial tasks, or miscellaneous motions, applications, pleadings, or objections (together with the Claims Reconciliation, the “***Remaining Matters***”)), such Remaining Matters may be resolved before the Court in the Remaining Case.

BASIS FOR RELIEF REQUESTED

9. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter the estate is fully administered in a chapter 11 case, the court must, on its own motion or on motion of a party in interest, enter a final decree closing the case.” FED. R. BANKR. P. 3022.

10. The term “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules. *In re JCP Props. Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015) (citing *In re SLI, Inc.*, No. 02-12608, 2005 WL 1668396, at *1 (Bankr. D. Del. June 24, 2005)). The Advisory Committee Note to Bankruptcy Rule 3022 (the “***Advisory Committee Note***”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;

- c. whether the property proposed by the plan to be transferred has been transferred;
- d. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- e. whether payouts under the plan have commenced; and
- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

FED. R. BANKR. P. 3022, Advisory Committee Note (1991). Courts look “to the advisory committee’s note on Bankruptcy Rule 3022 in seeking guidance as to the meaning of ‘fully administered.’” *See, e.g., JCP Props.*, 540 B.R. at 605 (observing that factors (c)–(e) correspond “to whether substantial consummation” of the chapter 11 plan has been achieved); *In re Valence Tech., Inc.*, No. 12-11580-CAG, 2014 WL 5320632, at *1 (Bankr. W.D. Tex. Oct. 17, 2014); *SLI, Inc.*, 2005 WL 1668396, at *2; *In re Kliegl Bros. Universal Elec. Stage Lighting Co., Inc.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999).

11. All of the Advisory Committee Note factors need not be present before a court may enter a final decree. *See, e.g., In re Clayton*, No. 96-20671, 1996 WL 661099, at *1 (5th Cir. Oct. 15, 1996) (“[the] factors merely serve as a guide, however, and each need not be present before the entry of a final decree.”); *Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (“[A]ll of the factors in the Committee Note need not be present before the Court will enter a final decree.”) (citations omitted).

12. Here, the majority of the foregoing factors weigh strongly in favor of closing the Affiliate Cases. Taking each factor in turn:

- a. the Court entered the Confirmation Order on June 22, 2026, confirming the Plan, the Confirmation Order is a final order, the Effective Date has occurred, and the Plan and related documents became binding and effective in accordance with their terms;
- b. prior to the Effective Date and as a condition precedent thereto, the Claims Reserve was established and funded;

- c. any remaining Assets not sold pursuant to the 363 Asset Sale or otherwise disposed of prior to the Effective Date vested in the Post-Sale Estates prior to the Effective Date;
- d. the Plan Administrator has assumed administration of the Post-Sale Estates;
- e. the Post-Sale Estates have fully paid or have commenced paying certain Allowed Claims pursuant to the terms of the Plan;
- f. other than the Remaining Matters, there are no motions, applications, contested matters, or adversary proceedings remaining.

13. In addition to factors set forth in the Advisory Committee Note, courts have considered whether the plan has been substantially consummated. *See JCP Props.*, 540 B.R. at 605 (noting that “substantial consummation is the pivotal question here to determine the propriety of closing the . . . case by Final Decree.”); *see also In re Gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case). Section 1101(2) of the Bankruptcy Code defines “substantial consummation” as the: (a) transfer of all or substantially all of the property proposed by the plan to be transferred; (b) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (c) commencement of distribution under the plan. 11 U.S.C. §1101(2).

14. Here, as noted above in the discussion of the Advisory Committee Note factors, the Effective Date has occurred and all three elements under the Bankruptcy Code’s definition of “substantial consummation” are present. Therefore, the Plan has been substantially consummated.

15. Additionally, valid business reasons exist that favor closing the Affiliate Cases. Each Post-Sale Estate is current with respect to fees payable to the U.S. Trustee pursuant to section 1930 of title 28 of the United States Code (“**U.S. Trustee Fees**”) through the calendar quarter ending June 30, 2026. Additionally, each Post-Sale Estate will pay all U.S. Trustee Fees accruing up to the date of the Final Decree for its respective Chapter 11 Case. However, until the Affiliate Cases are closed, the Post-Sale Estates will continue to pay the U.S. Trustee Fees and

expend resources complying with reporting requirements of the Affiliate Debtors. Closing the dockets of the Affiliate Cases will have no impact on the resolution of any remaining Claims or distributions, other legal entitlements under the Plan, or the substantive rights of any party in interest in any pending or forthcoming litigation and would stop the accrual of U.S. Trustee Fees associated with the Affiliate Cases.

16. The Plan Administrator will work to resolve the Remaining Matters that have been delegated to it under the Plan. To the extent issues arise relating to the Affiliate Debtors, such matters can be resolved under the Remaining Case without keeping the dockets of the Affiliate Cases open. In particular, the Claims Reconciliation and any further miscellaneous motions, applications, pleadings, or other matters or proceedings that may arise from time to time can be filed, administered, and adjudicated in the Remaining Case without any substantive or negative impact on any party in interest.³

17. Finally, entry of a final decree closing the Affiliate Cases will not adversely affect the substantive rights of any party in interest. *See In re Clayton*, 1996 WL 661099, at *1 (5th Cir. 1996) (“[E]ntry of a final decree is merely a perfunctory, administrative event and nothing more than a ministerial housekeeping act which was never designed to determine with finality the substantive rights of parties involved in a Chapter 11 case.”) (quoting *Greater Jacksonville Transp. Co. v. Willis (In re Greater Jacksonville Transp. Co.)*, 169 B.R. 221, 224 (Bankr. M.D. Fla. 1994)); *see also In re Gould*, 437 B.R. 34, 38 (Bankr. D. Conn. 2010) (noting that a final decree “simply

³ The Plan Administrator reserves all rights to dispute any outstanding Claims in accordance with the Plan, and the failure to object to any Claim filed in these Chapter 11 Cases prior to entry of the Final Decree shall not cause such claim to be deemed Allowed. Moreover, the Plan Administrator requests that the Court permit any objections to Claims against or Interests in any of the Chapter 11 Cases to be filed, administered, and adjudicated in the Remaining Case.

delineates on the docket that the case is closed; it represents the administrative conclusion of the case for record keeping purposes.”) (citations omitted).

18. Closing all of the Affiliate Cases is consistent with the confirmed Plan, which provides that “[t]he Plan Administrator shall, promptly after the full administration of the Chapter 11 Cases, File with the Bankruptcy Court all documents required by Bankruptcy Rule 3022 and any applicable order of the Bankruptcy Court to issue a final decree closing the Chapter 11 Cases.” Plan, Art. XV.R. Accordingly, for the reasons set forth above, closing all of the Affiliate Cases is appropriate.

NOTICE

19. Notice of this Motion has been provided by delivery to: (a) the U.S. Trustee and (b) those persons who have formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested in this Motion, the Plan Administrator submits that no further notice is necessary.

NO PRIOR REQUEST

20. No prior motion for the relief requested herein has been made to this Court or any other court.

PRAYER

The Plan Administrator respectfully requests that the Court enter the Final Decree, substantially in the form attached hereto as **Exhibit A** and grant such other and further relief to which the Plan Administrator may be justly entitled.

Dated: August 27, 2026
Houston, Texas

/s/ Paul E. Heath

VINSON & ELKINS LLP

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Counsel to the Plan Administrator

CERTIFICATE OF SERVICE

I certify that on August 27, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew J. Pyeatt
One of Counsel

EXHIBIT A

Proposed Final Decree

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

In re:	§	Case No. 26-90338 (CML)
	§	
AXIP ENERGY SERVICES, LP, et al.,	§	(Chapter 11)
	§	
	§	(Jointly Administered)
Debtors.¹	§	
	§	Re: Dkt. No.____

FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES

Upon the Motion² filed by Ankura Trust Company, LLC, solely in its capacity as the Plan Administrator (the “**Plan Administrator**”) of the Post-Sale Estates of the above-referenced debtors for entry of a Final Decree (the “**Final Decree**”) closing certain of the Chapter 11 Cases, all as more fully set forth in the Motion and in the First Day Declaration; and the Court having jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Post-Sale Estates and their respective creditors and other parties in interest; and the Court having found that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and the Court having found that good and sufficient cause

¹ The Debtors in these Chapter 11 Cases and the last four digits of their respective federal tax identification numbers are: Axip Energy Services, LP (9220); Axip Energy Services Management, LLC (9986); Axip Holdings, LLC (6302); Axip Leasing Company, LLC (5678); Axip Producer Services - Marcellus I, LLC (3312); Axip Producer Services, LLC (4792); and E3 Compression Holdings LLC (0825). The Debtors’ service address is: 15814 Champion Forest Dr, #310, Spring, TX 77379. As used herein, “**Debtors**” means, prior to the Effective Date, the above-captioned debtors and debtors in possession.

² Capitalized terms used but not otherwise defined herein shall have the meaning set forth in the Motion.

exists for the granting of the relief requested in the Motion after having given due deliberation to the Motion and all of the proceedings had before the Court in connection with the Motion, it is HEREBY ORDERED THAT:

1. The following Affiliate Cases are closed; provided that this Court retains jurisdiction as provided in the Plan and Confirmation Order:

	Debtor	Case No.
1	Axip Leasing Company, LLC	26-90337
2	E3 Compression Holdings LLC	26-90339
3	Axip Energy Services Management, LLC	26-90340
4	Axip Producer Services, LLC	26-90341
5	Axip Producer Services – Marcellus I, LLC	26-90342
6	Axip Holdings, LLC	26-90343

1. By no later than the later of (a) twenty-one (21) days after the date of entry of the Final Decree and (b) the date on which such post confirmation report is otherwise due, the Plan Administrator of the Post-Sale Estates shall file a post-confirmation quarterly report for the last period during which the Affiliate Cases remained open.

2. By no later than the later of (a) thirty (30) days after the date of entry of the Final Decree and (b) the date on which such U.S. Trustee Fees are otherwise due, the Post-Sale Estates shall pay the appropriate sum of U.S. Trustee Fees due and payable under 28 U.S.C. § 1930(a)(6)(A) and (B) to the U.S. Trustee. This Court retains jurisdiction to enforce payment of fees assessed under 28 U.S.C. § 1930(a)(6)(A) and (B).

3. The Remaining Case of Axip Energy Services, LP, *In re Axip Energy Services, LP*, Case No. 26-90338, shall remain open pending the entry of a final decree by this Court closing the Remaining Case.

4. The Remaining Matters, whether or not they pertain to the Remaining Case or Affiliate Cases, including any Claims Reconciliation with respect to the claims against the Affiliate Debtors, shall be filed, administered, and adjudicated in the Remaining Case without the need to reopen any of the Affiliate Cases. Any failure of the Post-Sale Estates to file an objection to any claim or interest in the Affiliate Cases on or prior to entry of this Final Decree shall not constitute allowance of the claim or interest and shall not result in such claim or interest being deemed allowed against any Post-Sale Estate. Any objections to claims against or interests in the Affiliate Debtors may be filed, administered, and adjudicated in the Remaining Case.

5. Entry of this Final Decree is without prejudice to (a) the rights of the Plan Administrator, the Post-Sale Estates, or any party in interest to seek to reopen any of the Affiliate Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the rights of the Plan Administrator or the Post-Sale Estates to dispute, in the Court, or any applicable non-bankruptcy forum, any claims that were filed against the Debtors in these Chapter 11 Cases as contemplated by the Plan and the Confirmation Order.

6. Quarterly disbursements for the Remaining Debtor will be reported pending entry of a final decree by this Court closing the Remaining Case.

7. Notwithstanding anything to the contrary in this Final Decree, all terms and conditions of this Final Decree shall be immediately effective and enforceable.

8. The Plan Administrator of the Post-Sale Estates is authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

9. The Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Final Decree.

Dated: _____, 2026
Houston, Texas

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

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

In re:	§	Case No. 26-90338 (CML)
	§	
AXIP ENERGY SERVICES, LP, et al.,	§	(Chapter 11)
	§	
	§	(Jointly Administered)
Debtors.¹	§	
	§	Re: Dkt. No.____

FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES

Upon the Motion² filed by Ankura Trust Company, LLC, solely in its capacity as the Plan Administrator (the “**Plan Administrator**”) of the Post-Sale Estates of the above-referenced debtors for entry of a Final Decree (the “**Final Decree**”) closing certain of the Chapter 11 Cases, all as more fully set forth in the Motion and in the First Day Declaration; and the Court having jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Post-Sale Estates and their respective creditors and other parties in interest; and the Court having found that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and the Court having found that good and sufficient cause

¹ The Debtors in these Chapter 11 Cases and the last four digits of their respective federal tax identification numbers are: Axip Energy Services, LP (9220); Axip Energy Services Management, LLC (9986); Axip Holdings, LLC (6302); Axip Leasing Company, LLC (5678); Axip Producer Services - Marcellus I, LLC (3312); Axip Producer Services, LLC (4792); and E3 Compression Holdings LLC (0825). The Debtors’ service address is: 15814 Champion Forest Dr, #310, Spring, TX 77379. As used herein, “**Debtors**” means, prior to the Effective Date, the above-captioned debtors and debtors in possession.

² Capitalized terms used but not otherwise defined herein shall have the meaning set forth in the Motion.

exists for the granting of the relief requested in the Motion after having given due deliberation to the Motion and all of the proceedings had before the Court in connection with the Motion, it is HEREBY ORDERED THAT:

1. The following Affiliate Cases are closed; provided that this Court retains jurisdiction as provided in the Plan and Confirmation Order:

	Debtor	Case No.
1	Axip Leasing Company, LLC	26-90337
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6	Axip Holdings, LLC	26-90343

1. By no later than the later of (a) twenty-one (21) days after the date of entry of the Final Decree and (b) the date on which such post confirmation report is otherwise due, the Plan Administrator of the Post-Sale Estates shall file a post-confirmation quarterly report for the last period during which the Affiliate Cases remained open.

2. By no later than the later of (a) thirty (30) days after the date of entry of the Final Decree and (b) the date on which such U.S. Trustee Fees are otherwise due, the Post-Sale Estates shall pay the appropriate sum of U.S. Trustee Fees due and payable under 28 U.S.C. § 1930(a)(6)(A) and (B) to the U.S. Trustee. This Court retains jurisdiction to enforce payment of fees assessed under 28 U.S.C. § 1930(a)(6)(A) and (B).

3. The Remaining Case of Axip Energy Services, LP, *In re Axip Energy Services, LP*, Case No. 26-90338, shall remain open pending the entry of a final decree by this Court closing the Remaining Case.

4. The Remaining Matters, whether or not they pertain to the Remaining Case or Affiliate Cases, including any Claims Reconciliation with respect to the claims against the Affiliate Debtors, shall be filed, administered, and adjudicated in the Remaining Case without the need to reopen any of the Affiliate Cases. Any failure of the Post-Sale Estates to file an objection to any claim or interest in the Affiliate Cases on or prior to entry of this Final Decree shall not constitute allowance of the claim or interest and shall not result in such claim or interest being deemed allowed against any Post-Sale Estate. Any objections to claims against or interests in the Affiliate Debtors may be filed, administered, and adjudicated in the Remaining Case.

5. Entry of this Final Decree is without prejudice to (a) the rights of the Plan Administrator, the Post-Sale Estates, or any party in interest to seek to reopen any of the Affiliate Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the rights of the Plan Administrator or the Post-Sale Estates to dispute, in the Court, or any applicable non-bankruptcy forum, any claims that were filed against the Debtors in these Chapter 11 Cases as contemplated by the Plan and the Confirmation Order.

6. Quarterly disbursements for the Remaining Debtor will be reported pending entry of a final decree by this Court closing the Remaining Case.

7. Notwithstanding anything to the contrary in this Final Decree, all terms and conditions of this Final Decree shall be immediately effective and enforceable.

8. The Plan Administrator of the Post-Sale Estates is authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

9. The Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Final Decree.

Dated: _____, 2026
Houston, Texas

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE