

SRF 68706

FILED FOR RECORDS  
12:05 O'CLOCK P M  
APR 17 2023  
SANDRA LIMAS  
CLERK CO. COURT, OCHILTREE CO. TEXAS  
BY *Isy Marquez*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
MAXUS ENERGY CORPORATION, <i>et al.</i> ,	)	
	)	Case No. 16-11501 (CTG)
Debtors.	)	
	)	Jointly Administered
MAXUS LIQUIDATING TRUST,	)	
	)	
Plaintiff,	)	Adversary Proceeding
	)	Case No. 18-50489 (CTG)
v.	)	
	)	
YPF S.A., YPF INTERNATIONAL S.A., YPF	)	
HOLDINGS, INC., CLH HOLDINGS, INC.,	)	
REPSOL, S.A., REPSOL EXPLORACIÓN, S.A.,	)	
REPSOL USA HOLDINGS CORP., REPSOL E&P	)	<b>RE: D.I. 2568, Adv. D.I. 883</b>
USA, INC., REPSOL OFFSHORE E&P USA, INC.,	)	
REPSOL E&P T&T LIMITED, and REPSOL	)	
SERVICES CO.,	)	
	)	<b>Objection Deadline: April 25, 2023 at 4:00</b>
Defendants.	)	<b>p.m. (ET)</b>
	)	<b>Hearing Date: May 3, 2023 at 2:00 p.m.</b>
	)	<b>(ET)</b>

**NOTICE OF MOTION AND HEARING**

PLEASE TAKE NOTICE that, on April 7, 2023, the Maxus Liquidating Trust filed the **Motion for Entry of an Order (I) Approving the Settlement by and among the Maxus Liquidating Trust, the YPF Defendants, and the Repsol Defendants, and (III) Clarifying the Plan Injunction (D.I. 2568; Adv. D.I. 883)** (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”).

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained at <https://pacer.uscourts.gov/> or free of charge at <https://cases.ra.kroll.com/maxus/Home-DocketInfo>.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, filed with the Clerk of the Court, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 and served upon and received by the undersigned counsel on or before **4:00 p.m. on April 25, 2023 (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, if any objections or responses are received, a hearing with respect to the Motion will be held on **May 3, 2023 at 2:00 p.m. (prevailing Eastern Time)**, before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge, at the Court, 824 Market Street, 3<sup>rd</sup> Floor, Courtroom No. 7, Wilmington Delaware 19801.

**IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 10, 2023  
Wilmington, Delaware

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (Bar No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 North Market St., 12th Floor  
Wilmington, DE 19801  
Telephone: (302) 777-0300  
Facsimile: (302) 777-0301  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

—and—

WHITE & CASE LLP  
J. Christopher Shore (admitted *pro hac vice*)  
Thomas MacWright (admitted *pro hac vice*)  
Brett Bakemeyer (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020

Telephone: (212) 819-8200  
Facsimile: (212) 354-8113  
cshore@whitecase.com  
tmacwright@whitecase.com  
brett.bakemeyer@whitecase.com  
*Counsel for Liquidating Trust*