

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS**

-----	X	
	:	
In re:	:	Chapter 15
	:	
KODIAK SERVICES USA, INC., <i>et al.</i> ,	:	Case No. 19-70031 (TMD)
	:	
Debtors. ¹	:	Jointly Administered
	:	
-----	X	

**AMENDED NOTICE OF MOTION TO
CLOSE CHAPTER 15 CASES WITH FINAL REPORT**

**TO ALL CREDITORS, INTEREST HOLDERS AND OTHER PARTIES IN
INTEREST:**

PLEASE TAKE NOTICE that on May 24, 2021, Ernst & Young Inc., in its capacity as the authorized foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors” or “Kodiak”), by and through its United States counsel, Dentons US LLP, hereby filed the Motion to Close Chapter 15 Cases with Final Report (the “Motion”) [Dkt No. 68].

PLEASE TAKE FURTHER NOTICE that no hearing will be conducted hereon unless a written response is filed with the clerk of the United States Bankruptcy Court For the Western District of Texas, Austin Division, 903 San Jacinto Street, Suite 322, Austin, TX 78701 by **June 14, 2021** (the “Objection Deadline”), which is at least 21 days from the date of service hereof.

PLEASE TAKE FURTHER NOTICE that any response to this Motion shall be in writing and filed with the clerk, and a copy shall be served upon (a) the Office of the United States Trustee; (b) the Foreign Representative, and (c) all parties who have requested, or are required to receive,

¹ The last four digits of the United States Tax Identification Number or Canadian Business Number of the Debtors, as applicable, follow in parentheses: Kodiak Services USA, Inc. (0169) (“Kodiak USA”), Kodiak Services Partnership (9809) (“Kodiak Partnership”), Kodiak Wireline Services Ltd. (2948) (“Kodiak Wireline”), Kodiak Energy Solutions Ltd. (2892) (“Kodiak Solutions”), Kodiak Tools Ltd. (3099) (“Kodiak Tools”), and 1623360 Alberta Ltd. (1045) (“162 Alberta”, collectively with Kodiak Partnership, Kodiak Wireline, Kodiak Solutions, and Kodiak Tools, the “Canadian Debtors”).
US_Active\118275129\V-2

notice pursuant to Bankruptcy Rule 2002 as of the date of the Motion.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THIS MOTION BY THE OBJECTION DEADLINE IN ACCORDANCE WITH THIS NOTICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING.

Dated: May 24, 2021

/s/ Lauren Macksoud
DENTONS US LLP
Lauren Macksoud (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Tel: (212) 768-6700
Fax: (212) 768-6800
Email: lauren.macksoud@dentons.com

and

Casey Doherty
Texas Bar No. 24078431
LyondellBasell Tower
1221 McKinney Street
Suite 1900
Houston, TX 77010
Tel: (713) 658-4600
Fax: (713) 739-0834
Email: casey.doherty@dentons.com

*Counsel for Ernst & Young Inc., in its capacity as receiver
for the Debtors*