IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re	§	**Chapter 11**
	§	
ALL AMERICAN OIL & GAS INCORPORATED, *et al.*[1]	§	**Case No. 18-52693-rbk**
	§	
Debtors.	§	**Jointly Administered**
	§	
	§	

KERN CAL OIL 7, LLC'S FOURTH UNOPPOSED MOTION FOR ENTRY OF AN ORDER EXTENDING TIME TO FILE A RESPONSE TO THE APPLICATION TO EMPLOY HOULIHAN LOKEY CAPITAL, INC. AS FINANCIAL ADVISOR AND INVESTMENT BANKER FOR THE DEBTORS

[Relates to Docket No. 128]

Kern Cal Oil 7, LLC ("KCO") files this Fourth Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors (the "Motion") and respectfully states as follows:

RELIEF REQUESTED

1. KCO seeks entry of an order extending the deadline by which KCO must file its response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors, up to and including March 8, 2019.

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b).

[1] The Debtors in these Cases, along with the last four digits of each Debtor's federal tax identification number are: All American Oil & Gas Incorporated (5894); Kern River Holdings Inc. (0508); and Western Power & Steam, Inc. (2088). The location of the Debtors' service address is: 9601 McAllister Freeway, Suite 221, San Antonio, Texas 78216.

3. Venue of this case and this Motion in this District is proper under 28 U.S.C. §§ 1408.

4. The basis for the relief requested herein is Rule 9006(b)(1) of the Federal Rule of Bankruptcy Procedures (the "Bankruptcy Rules").

BACKGROUND

5. On December 11, 2018, the Debtors filed the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors (the "Houlihan Application"). The deadline to file a response to the Houlihan Application was January 4, 2019.

6. KCO filed an Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors [Docket No. 193] on December 31, 2018.

7. On January 2, 2019, the Court entered an Order Granting Kern Cal Oil 7, LLC'S Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors [Docket No. 198], extending the deadline by which KCO must file its response to January 16, 2019.

8. KCO filed its Second Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors [Docket No. 255] on January 16, 2019.

9. On January 17, 2019, the Court entered an Order Granting Kern Cal Oil 7, LLC'S Second Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and

Investment Banker for the Debtors [Docket No. 265], extending the deadline by which KCO must file its response to February 7, 2019.

10. KCO filed its Third Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors [Docket No. 417] on February 19, 2019.

11. On February 19, 2019, the Court entered an Order Granting Kern Cal Oil 7, LLC'S Third Unopposed Motion for Entry of an Order Extending Time to File a Response to the Debtors' Application to Employ Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors [Docket No. 418], extending the deadline by which KCO must file its response to March 1, 2019.

RELIEF REQUESTED

12. On February 27, 2019, KCO conferred with the Debtors and the parties agreed to extend the deadline to respond to the Houlihan Application to March 8, 2019. The extension will have no significant impact on this case.

13. Pursuant to this Court's November 15, 2018 *Order Granting Complex Chapter 11 Bankruptcy Case Treatment* [Docket No. 55], unless otherwise directed by the Court, a non-movant must file a response within twenty-four (24) days of service of the pleading. Pursuant to Bankruptcy Rule 9006(b)(1), the Court has authority to extend the time required for filing a response to a pleading "for cause." Fed. R. Bankr. P. 9006(b)(1).

14. KCO submits that ample cause exists to grant the relief requested herein. The Debtors and KCO are engaging in discussions and exchanging information that may resolve KCO's concerns regarding the relief sought in the Houlihan Application. Moreover, the Debtors

have agreed to grant KCO an extension of the deadline to file its response to the Houlihan Application, up to and including March 8, 2019.

NOTICE

15. KCO will provide notice of this Motion to the Master Service List, including any party that has requested notice pursuant to Bankruptcy Rule 2002. KCO submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, KCO respectfully requests that the Court enter an Order granting the relief requested herein and such other and further relief as may be just and proper.

Dated: February 28, 2019.

Respectfully submitted,

PORTER HEDGES LLP

By: /s/ John F. Higgins

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COUNSEL FOR KERN CAL OIL 7 LLC

CERTIFICATE OF SERVICE

I certify that, on February 28, 2019, a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case.

/s/ John F. Higgins
John F. Higgins