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COUNSEL TO THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Chapter 11
§
ROCKIES REGION 2006 LIMITED § Case No. 18-33513-sgj-11
PARTNERSHIP and ROCKIES REGION §
2007 LIMITED PARTNERSHIP,¹ § (Jointly Administered)
§
Debtors. §

MOTION FOR EXPEDITED HEARING ON DEBTORS’ EXPEDITED MOTION TO EXCLUDE EXPERT REPORTS AND TESTIMONY OF GREGORY E. SCHEIG

Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), for their Motion for Expedited Hearing (the “Motion”) on their *Expedited Motion to Exclude Expert Reports and Testimony of Gregory E. Scheig* (the “Motion to Exclude”), respectfully represent:

1. Simultaneously herewith, the Debtors filed their Motion to Exclude.² The Debtors respectfully requests that the Court set a hearing on the Motion to Exclude immediately prior to the hearings on the Pending Matters on Thursday, June 20, 2019 at 9:30 a.m.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Rockies Region 2006 Limited Partnership (9573) and Rockies Region 2007 Limited Partnership (8835).

² Capitalized terms used but not defined herein have the meanings set forth in the Motion to Exclude.

2. As mentioned in the Motion to Exclude, the LP Plaintiffs³ served the Scheig Report and the Scheig Rebuttal Report in connection with the hearings on the Pending Matters. The Debtors seek to exclude the Solvency Opinions contained in the Scheig Report because they will not assist the Court in ruling on the Pending Matters. Moreover, the Scheig Rebuttal Report should be excluded in its entirety because it was untimely and constitutes an improper legal opinion.

3. The Debtors anticipate that the LP Plaintiffs will call Mr. Scheig to testify at the hearings on the Pending Matters set for June 20-21, 24, 2019. In order to obtain a ruling prior to the onset of hearings on the Pending Matters, the Debtors respectfully submit that expedited consideration of the Motion to Exclude is appropriate.

4. The Debtors will provide notice of this Motion to (i) counsel to PDC; (ii) counsel to the LP Plaintiffs; (iii) the U.S. Trustee; and (iv) the other parties appearing on the Limited Service List maintained in these chapter 11 cases. The Debtors respectfully submit that such notice is appropriate and that no other or further notice be provided.

WHEREFORE, the Debtors respectfully request that this Court enter an Order (i) setting an expedited hearing on the Motion to Exclude on June 20, 2019 at 9:30 a.m.; and (ii) granting such other and further relief as may be just and proper.

³ The LP Plaintiffs are (i) Robert R. Dufresne, as Trustee of the Dufresne Family Trust; (ii) Michael A. Gaffey, as Trustee of the Michael A. Gaffey and JoAnne M. Gaffey Living Trust dated March 2000; (iii) Ronald Glickman, as Trustee of the Glickman Family Trust established August 29, 1994; (iv) Jeffrey R. Schulein, as Trustee of the Schulein Family Trust established March 29, 1989; and (v) William J. McDonald as Trustee of the William J. McDonald and Judith A. McDonald Living Trust dated April 16, 1991.

Respectfully submitted this 7th day of June, 2019.

GRAY REED & McGRAW LLP

By: /s/ Jason S. Brookner

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CERTIFICATE OF CONFERENCE

I hereby certify that on June 7, 2019, I conferred with counsel to the LP Plaintiffs regarding the relief sought in this Motion and the proposed setting on the Motion to Exclude. The LP Plaintiffs had not responded at the time of the filing of this Motion.

/s/ Lydia R. Webb

Lydia R. Webb

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of June, 2019, she caused a true and correct copy of the foregoing document to be served on the parties appearing on the Limited Service List maintained in these cases via first class United States mail, postage prepaid and, where possible, via electronic mail.

/s/ Lydia R. Webb

Lydia R. Webb

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ROCKIES REGION 2006 LIMITED	§	Case No. 18-33513-sgj-11
PARTNERSHIP and ROCKIES REGION	§	
2007 LIMITED PARTNERSHIP, ¹	§	(Jointly Administered)
	§	
Debtors.	§	

**ORDER GRANTING MOTION FOR EXPEDITED HEARING ON
DEBTORS' EXPEDITED MOTION TO EXCLUDE EXPERT
REPORTS AND TESTIMONY OF GREGORY E. SCHEIG**

Upon the Motion for Expedited Hearing (the "Motion") on the Expedited Motion to Exclude Expert Reports and Testimony of Gregory E. Scheig (the "Motion to Exclude") filed by the above-captioned debtors and debtors in possession (collectively, the "Debtors"), it is hereby

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Rockies Region 2006 Limited Partnership (9573) and Rockies Region 2007 Limited Partnership (8835).

ORDERED that the Motion is **GRANTED** as set forth herein; it is further

ORDERED that a hearing will be held on the Motion to Exclude on **Thursday, June 20, 2019 at 9:30 a.m.** before the Honorable Stacey G. C. Jernigan, in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Earle Cabell Federal Building, 1100 Commerce Street, 14th Floor, Room 1421 (Courtroom #1), Dallas, TX 75242-1496; it is further

ORDERED that the Debtors shall promptly provide notice of the hearing in the same manner as notice of the Motion to Exclude and the Motion were provided; and it is further

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

End of Order

Submitted by:

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