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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,<sup>1</sup> § (Jointly Administered)  
§  
Debtors. §

**EMERGENCY MOTION TO SHORTEN RESPONSE TIME AND REQUEST FOR HEARING TO APPROVE DISCLOSURE STATEMENT**

Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership, the above-captioned debtors and debtors in possession (together, the “Debtors”), for their Emergency Motion to Shorten Response Time and Request for Hearing to Approve Disclosure Statement (the “Motion”), respectfully represents:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§157 and 1334. This Motion presents a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

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<sup>1</sup> 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. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **INTRODUCTION AND BACKGROUND**

3. On October 30, 2018 (the “Petition Date”), each of the each of the Debtors filed with this Court petitions for relief under chapter 11 of the Bankruptcy Code (the “Bankruptcy Code”).

4. The Debtors are continuing to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or official committee has been appointed.

5. On July 24, 2019, the Debtors filed their *Disclosure Statement for Debtors’ Amended Joint Chapter 11 Plan* [Docket No. 227] (the “Disclosure Statement”) and their accompanying *Amended Joint Chapter 11 Plan* [Docket No. 226] (the “Plan”).

6. The Plan and Disclosure Statement reflect the global settlement between the Debtors, the Debtors’ managing general partner PDC Energy, Inc. (“PDC”), and the LP Plaintiffs.<sup>2</sup> One of the conditions of the global settlement is that the parties use best efforts to ensure that the effective date of the Plan shall occur, and distributions pursuant thereto be made, prior to December 31, 2019.

### **RELIEF REQUESTED**

7. The Debtors seek an order under Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (i) shortening the time to file objections to the Disclosure Statement by three (3) days

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<sup>2</sup> The LP Plaintiffs are Robert R. Dufresne, as Trustee of the Dufresne Family Trust; Michael A. Gaffey, as Trustee of the Michael A. Gaffey and JoAnne M. Gaffey Living Trust dated March 2000; Ronald Glickman, as Trustee of the Glickman Family Trust established August 29, 1994; Jeffrey R. Schulein, as Trustee of the Schulein Family Trust established March 29, 1989; and William J. McDonald, as Trustee of the William J. McDonald and Judith A. McDonald Living Trust dated April 16, 1991.

to August 22, 2019, and (ii) setting a hearing for consideration of approval of the Disclosure Statement on August 26, 2019 at 9:30 a.m.

8. Rule 2002(b) of the Federal Rules of Bankruptcy Procedure requires 28 days' notice of the objection deadline and hearing date for consideration of approval of a disclosure statement. The Court's Judge-Specific Guidelines, however, provide that disclosure statements and chapter 11 plans be set with not less than 31 days' notice.

9. Rule 9006(c) of the Federal Rules of Bankruptcy Procedure authorized the Court, for good cause shown, to reduce the notice period required by Rule 2002. *In re Holland*, 95 B.R. 735, 737 (Bankr. W.D. Tex. 1988) (holding that Bankruptcy Rule 9006(c) gives the court "the power to reduce the time periods set out in Bankruptcy Rule 2002(b) for giving notice of hearing on the approval of a disclosure statement and for giving notice of hearing on confirmation of a plan").

10. The Debtors seek to shorten notice relating to its Disclosure Statement by three (3) days so that the Debtors may solicit their Plan and achieve certain milestones set forth in the global settlement with PDC and the LP Plaintiffs – specifically, that distributions be made before year end. If the Disclosure Statement is approved on August 26, 2019, the Debtors plan to mail solicitation packages no later than August 30, 2019. If the Court does not grant the relief requested in this Motion, Debtors will most likely not be able to mail its solicitation packages within a time frame that would allow confirmation to occur by the first week of October 2019. Given the timelines for submission and approval of administrative expense claims and fee claims in the Plan, the Debtors are concerned that if confirmation is set any later, the Debtors would not be able to make distributions prior to December 31, 2019. As a result, the Debtors submit that good cause exists to reduce the notice period with respect to the Disclosure Statement.

11. PDC and the LP Plaintiffs do not oppose a hearing on the disclosure statement on August 26, 2019.

**WHEREFORE**, Debtors requests that the Court (i) grant the Motion, (ii) shorten the response time to file an objection to the Disclosure Statement to August 22, 2019, (iii) set a hearing to consider approval of the Disclosure Statement on August 26, 2019 at 9:30 a.m. and (iv) grant such other and further relief as may be just and proper.

Respectfully submitted this 25th day of July, 2019.

**GRAY REED & MCGRAW LLP**

By: /s/ Jason S. Brookner

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**COUNSEL TO THE DEBTORS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25th day of July, 2019, he caused a true and correct copy of the foregoing document to be served via the Court's CM/ECF system on all those who have so-subscribed and on the parties appearing on the Debtors' limited service list via first class United States mail, postage prepaid and, where possible, via electronic mail.

/s/ Jason S. Brookner

Jason S. Brookner

**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, <sup>1</sup>	§	(Jointly Administered)
	§	
Debtors.	§	

**ORDER GRANTING EMERGENCY MOTION TO SHORTEN RESPONSE TIME AND  
REQUEST FOR HEARING TO APPROVE DISCLOSURE STATEMENT**

Upon the Emergency Motion to Shorten Response Time and Request for Hearing to Approve Disclosure Statement (the “Motion”), filed by Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership, the above-captioned debtors and debtors in possession (together, the “Debtors”), it is hereby

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<sup>1</sup> 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 objections to the Disclosure Statement, if any, shall be filed with the Clerk and served on counsel to the Debtors, PDC, the LP Plaintiffs and the US Trustee no later than August 22, 2019 by 5:00 p.m. (Central Time); and it is further

**ORDERED** that a hearing to consider the Disclosure Statement shall take place on August 26, 2016 at 9:30 a.m.

### END OF ORDER ###