

Hearing Date: March 19, 2014 at 11:00 a.m. (prevailing Eastern time)  
Objection Deadline: March 12, 2014 at 5:00 p.m. (prevailing Eastern time)

Dennis F. Dunne  
Evan R. Fleck  
Lena Mandel  
MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP  
1 Chase Manhattan Plaza  
New York, NY 10005  
Telephone: (212) 530-5000

Andrew M. Leblanc  
MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP  
1850 K Street, NW, Suite 1100  
Washington, DC 20006  
Telephone: (202) 835-7500

*Counsel for the Reorganized Debtors and  
the New Holding Companies*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	Chapter 11
	:	
ARCAPITA BANK B.S.C.(c), <u>et al.</u> ,	:	Case No. 12-11076 (SHL)
	:	
Reorganized Debtors.	:	Confirmed
-----	X	

**NOTICE OF MOTION FOR ORDER PURSUANT TO RULE 9019 APPROVING  
SETTLEMENT AGREEMENT WITH THRONSON PARTIES**

**PLEASE TAKE NOTICE** that on **February 13, 2014**, Falcon Gas Storage Company, Inc. ("Falcon") filed the attached *Motion For Order Pursuant to Rule 9019 Approving Settlement Agreement With Thronson Parties* (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, on **March 19, 2014 at 11:00 a.m. (prevailing U.S. Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion shall be filed with the Court either by (a) electronic filing pursuant to the Court's General Order M-399 (available at [www.nysb.uscourts.gov/court-info/local-rules-and-orders/general-orders](http://www.nysb.uscourts.gov/court-info/local-rules-and-orders/general-orders)), by registered users of the Court's case filing system and by all other parties in interest on a compact disk, preferably in portable document format, Microsoft Word, or any other Windows-based word processing format (with a hard copy delivered to Chambers), in accordance with the customary practices of the Court and General Order M-399, to the extent applicable, or (b) delivering the original objection to the Court at One Bowling Green, Room 701, New York, New York 10004-1408, and served in accordance with General Order M-399 on (i) the Chambers of the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408; (ii) counsel for the Reorganized Debtors, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Evan R. Fleck, Esq.); and (iii) counsel for Thronson Parties, Law Office of Mark A. Sanders, 11511 Katy Freeway, Suite 600, Houston, TX 77079 (Attn: Mark A. Sanders, Esq.), so as to be received no later than **March 17, 2014 at 4:00 p.m. (prevailing U.S. Eastern Time)**.

Dated: February 13, 2014  
New York, New York

**MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP**

/s/ Lena Mandel

Dennis F. Dunne

Evan R. Fleck

Lena Mandel

One Chase Manhattan Plaza

New York, NY 10005-1413

Telephone: (212) 530-5000

Andrew M. Leblanc

1850 K Street, NW, Suite 1100

Washington, DC 20006

Telephone: (202) 835-7500

*Counsel for the Reorganized Debtors and  
the New Holding Companies*