

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
Quicksilver Resources Inc., <u>et al.</u> , <sup>1</sup>	)	Case No. 15-10585 (LSS)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Hearing Date: June 9, 2015 at 10:00 a.m. (ET)</b>
	)	<b>Obj. Deadline: June 2, 2015 at 4:00 p.m. (ET)</b>

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER ESTABLISHING  
DEADLINES AND PROCEDURES FOR FILING PROOFS OF CLAIM  
AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

The debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) seek entry of an order substantially in the form attached hereto as **Exhibit A** (the “Bar Date Order”) (i) establishing deadlines and procedures for filing proofs of claim in the Debtors’ chapter 11 cases and (ii) approving the form and manner of notice thereof.

In support of this motion, the Debtors respectfully state:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The predicates for the relief requested herein are sections 501 and 502 of title 11 of the United States Code (the “Bankruptcy Code”), rules 2002, 3001, 3002, 3003, 3005, 5005, and 9008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule

---

<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: Quicksilver Resources Inc. [6163]; Barnett Shale Operating LLC [0257]; Cowtown Drilling, Inc. [8899]; Cowtown Gas Processing L.P. [1404]; Cowtown Pipeline Funding, Inc. [9774]; Cowtown Pipeline L.P. [9769]; Cowtown Pipeline Management, Inc. [9771]; Makarios Resources International Holdings LLC [1765]; Makarios Resources International Inc. [7612]; QPP Holdings LLC [0057]; QPP Parent LLC [8748]; Quicksilver Production Partners GP LLC [2701]; Quicksilver Production Partners LP [9129]; and Silver Stream Pipeline Company LLC [9384]. The Debtors’ address is 801 Cherry Street, Suite 3700, Unit 19, Fort Worth, Texas 76102.

2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).<sup>2</sup>

### **BACKGROUND**

4. On March 17, 2015 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases. On March 25, 2015, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors.

5. A detailed description of the Debtors and their businesses are set forth in the Declaration of Vanessa Gomez LaGatta in Support of First Day Pleadings filed on the Petition Date [D.I. 19].

### **PROPOSED BAR DATES AND NOTICING PROCEDURES**

#### **A. The Need for a General Bar Date**

6. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which proofs of claim must be filed in a chapter 11 case pursuant Bankruptcy Code section 501. The Debtors anticipate filing their schedules of assets and liabilities (the “Schedules”) and statements of financial affairs on or before the hearing on this motion.<sup>3</sup> In an effort to advance these cases and efficiently move through the chapter 11 process, the Debtors seek to establish a

---

<sup>2</sup> Pursuant to Local Rule 9013-1(f), the Debtors hereby confirm their consent to the entry of a final order by this Court in connection with this Motion if it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection therewith consistent with Article III of the United States Constitution.

<sup>3</sup> On April 14, 2015, the Court entered the *Order Extending Time to File Schedules and Statements of Financial Affairs* [D.I. 193] extending the deadline by which the Debtors must file their Schedules and statements of financial affairs to May 18, 2015. On May 15, 2015, the Debtors filed their *Motion for Entry of an Order Further Extending the Time to File Schedules of Assets and Liabilities and Statements Of Financial Affairs* [D.I. 344] seeking a further extension of time to file the Schedules and statements of financial affairs through and including June 9, 2015.

process and deadline for filing proofs of claim, so that each of the Debtors and other parties in interest may ascertain the nature, extent, and scope of the claims asserted against the Debtors. After filing the Schedules, the Debtors propose to give all known entities holding potential claims and other parties in interest at least 30 days<sup>4</sup> notice of the General Bar Date (as defined below), which will provide such parties with ample time to review the Schedules and their own records and to file a proof of claim if necessary.

**B. The Claims and Noticing Agent**

7. On March 19, 2015, the Court entered the *Order Authorizing Retention and Appointment of Garden City Group, LLC as Claims and Noticing Agent under 28 U.S.C. § 156(c), 11 U.S.C. § 105(a), and Local Rule 2002-1(f) Nunc Pro Tunc to the Petition Date* [D.I. 86] authorizing the retention and employment of Garden City Group, LLC (“GCG”) as the noticing, claims, and balloting agent for the Debtors. As the Debtors’ claims agent, GCG will be responsible for, among other things, maintaining the database containing the Schedules and maintaining and docketing proofs of claims that are filed in these chapter 11 cases.

**C. The Proposed Bar Dates**

8. The Debtors request that the Court establish the following bar dates (each a “Bar Date” and collectively, with the General Bar Date, the “Bar Dates”):

	<b>Bar Date</b>	<b>Description</b>
The “ <u>General Bar Date</u> ”	July 31, 2015 at 5:00 p.m. prevailing Eastern Time	The deadline by which each entity <sup>5</sup> other than a governmental unit must file a proof of claim in respect of a pre-petition claim <sup>6</sup> against any Debtor, including a claim entitled to priority under Bankruptcy Code section 503(b)(9)

<sup>4</sup> For the avoidance of doubt, Bankruptcy Rule 9006 shall apply in computing any time period specified herein.

<sup>5</sup> The term “entity” as used herein shall have the meaning defined in Bankruptcy Code section 101(15).

<sup>6</sup> The term “claim” as used herein shall have the meaning defined in Bankruptcy Code section 101(5).

	<b>Bar Date</b>	<b>Description</b>
The “ <u>Government Bar Date</u> ”	September 14, 2015 at 5:00 p.m. prevailing Eastern Time	The deadline by which a governmental unit (as defined in Bankruptcy Code section 101(27)) must file a proof of claim
The “ <u>Rejection Damage Claim Bar Date</u> ”	The later of either (i) the General Bar Date or (ii) a date provided in an order of the Court authorizing the rejection of such executory contract or unexpired lease, or if no date is provided, thirty (30) days after entry of the order authorizing such rejection	The deadline by which any entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a proof of claim on action of such rejection
The “ <u>Amended Schedule Bar Date</u> ”	The later of (i) the applicable Bar Date or (ii) thirty (30) days after the date on which the Debtors provided notice of such amendment or supplement (or another time period as may be fixed by the Court)	The deadline by which an affected creditor must file a proof of claim if (i) the Debtors amend or supplement their Schedules subsequent to serving notice of the Bar Dates substantially in the form attached hereto as <b><u>Exhibit C</u></b> (the “ <u>Bar Date Notice</u> ”) in a manner that changes the amount, nature, classification or characterization of a debt owing to a creditor and (ii) the affected creditor does not agree with such amendment or supplement

#### **D. The Bar Date Packages**

9. The Debtors propose that each mailing distributed in accordance with the procedures set forth herein will include (1) the Bar Date Notice and (2) a customized cover letter (“Cover Letter”) substantially in the form attached hereto as **Exhibits D-1** (for scheduled creditors), **D-2** (for unscheduled parties) or **D-3** (for beneficial holders of securities) that will include personalized information reflected in the Debtors’ Schedules, if any, and instructions for filing an electronic proof of claim, including a unique Claimant and Control Number

(“Credentials”) for the online claim filing portal (the “Online Portal”) on the case administration website maintained by GCG.

10. Any party can file a claim on the Online Portal, through a process that has already been reviewed and preliminarily approved by the Clerk of the Court. The Online Portal provides a series of screens which solicit the information required to populate a proof of claim form. To the extent a party has Credentials, then the information the Debtors have will be prepopulated into the proof of claim form on the Online Portal, but will remain modifiable. After submitting a proof of claim through the Online Portal, a party will receive a completed, electronically-signed Proof of Claim Form (as defined below) and an email confirmation of its submission through the Online Portal.

11. Additionally, the Debtors have prepared a form, a copy of which attached as **Exhibit B** (the “Proof of Claim Form”), to facilitate filing proofs of claim. As required by Bankruptcy Rule 3001, the Proof of Claim Form substantially conforms to Official Form 10, with the following substantive modifications:

- (a) indicating how the Debtors have listed each creditor’s respective claim on the Debtors’ Schedules, including the creditor’s name, the amount of the creditor’s claim against the applicable Debtor, the type of claim held by such creditor (i.e., non-priority unsecured, priority unsecured, or secured) and whether such claim is disputed, contingent, or unliquidated;
- (b) adding a field to identify whether a claim is being asserted under Bankruptcy Code section 503(b)(9); and
- (c) adding certain instructions, including instructions applicable to the electronic filing of a proof of claim on the Online Portal.

A complete list of all differences between Official Form 10 and the Proof of Claim Form are attached as **Schedule 1 to Exhibit B** (*Changes to Official Form 10 in the Proposed Proof of Claim Form*). The Proof of Claim Form will be available on the case administration website maintained by GCG, [www.gardencitygroup.com/cases/kwk](http://www.gardencitygroup.com/cases/kwk). Each creditor will have an

opportunity to inspect the Proof of Claim Form provided by GCG and correct any information that is missing, incorrect, or incomplete either electronically by using the Online Portal or by mailing GCG the updated Proof of Claim Form. The Proof of Claim Form, as well as the personalized information, will facilitate these chapter 11 cases by reducing delay, confusion, and expense and will make possible the matching of scheduled and filed claims while providing additional time for each creditor to correct any incorrect information.

12. For certain parties who live in rural areas and may not have readily available access to the Online Portal maintained by GCG, as determined by the Debtors in their sole discretion, the Debtors propose to provide, with the assistance of GCG, a customized cover letter substantially in the form attached hereto as **Exhibit D-4** and a hard-copy, paper Proof of Claim Form. In addition, any party in interest may request that GCG mail them (at no cost to the creditor) a hard-copy, paper Proof of Claim Form by emailing [KWKinfo@gcginc.com](mailto:KWKinfo@gcginc.com), calling toll-free (877) 940-2410, or writing Quicksilver Resources Inc., et al., c/o GCG, P.O. Box 10155, Dublin, OH 43017-3155.

13. The Debtors request that the Court approve the Debtors' proposed Proof of Claim Form substantially in the form attached hereto as **Exhibit B** and the cover letters substantially in the form attached hereto as **Exhibits D-1, D-2, D-3 and D-4**. A blank Proof of Claim Form in fillable PDF format will also be available on the case administration website, [www.gardencitygroup.com/cases/kwk](http://www.gardencitygroup.com/cases/kwk).

#### **E. The Bar Date Notice Procedures**

14. Notice by Mail. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors propose to mail by First-Class U.S. mail, postage prepaid, the Bar Date Notice, including the applicable cover letter, in a form substantially similar to the notice attached hereto as **Exhibit C**, within two (2) business days entry of an order approving this motion or as soon as reasonably practicable

thereafter, thus allowing all creditors approximately thirty (30) days to prepare and file their proofs of claim.

15. After the initial mailing of the Bar Date Notice, the Debtors anticipate that it may be appropriate to make supplemental mailings of notices in a number of situations, including in the event that (a) notices are returned by the post office with forwarding addresses (unless notices are returned as “return to sender” without a forwarding address, in which case the Debtors should not be required to mail additional notices to such creditors), (b) certain parties acting on behalf of parties in interest that decline to pass along notices to these parties and instead return their names and addresses to the Debtors for direct mailing, and (c) additional potential claimants who subsequently become known as a result of the Bar Date noticing process or otherwise. In this regard, the Debtors request that the Court permit them, with the assistance of GCG, to make supplemental mailings of the Bar Date Notice in these and similar circumstances at any time in advance of the Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to recipient creditors. The Debtors believe that these proposed supplemental mailings will help provide actual notice to known creditors wherever practicable, while at the same time preserving the integrity of the applicable Bar Date.

16. GCG will serve the Bar Date Notice on the following parties (the “Notice Parties”):

- (a) all creditors and other known holders of claims as of the date of entry of the Bar Date Order, including all entities listed on the Debtors’ schedules of liabilities at the addresses stated therein;
- (b) all parties to litigation with any of the Debtors as of the date of entry of the Bar Date Order;
- (c) the U.S. Trustee;
- (d) counsel to the Official Committee of Unsecured Creditors;

- (e) counsel to the agents and lenders under the U.S. Credit Agreement, Canadian Credit Agreement, Second Lien Credit Agreement, and Second Lien Indenture (each of the foregoing as defined below);
- (f) counsel to the Ad Hoc Group of Second Lienholders (as defined in the *Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Code rule 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral, and (II) Granting Adequate Protections to Prepetition Secured Parties* [D.I. 307] (the “Cash Collateral Order”));
- (g) counsel to the indenture trustees under the Debtors’ pre-petition indentures;
- (h) all entities that have filed a proof of claim in these cases as of the date of entry of the Bar Date Order;
- (i) all known holders of an equity interest in the Debtors;
- (j) all parties to executory contracts and unexpired leases of the Debtors;
- (k) the Debtors’ current officers, directors, and employees;
- (l) the Internal Revenue Service;
- (m) all applicable state and local taxing authorities;
- (n) the United States Securities and Exchange Commission;
- (o) the United States Environmental Protection Agency;
- (p) any applicable state environmental agency;
- (q) the United States Department of Justice;
- (r) the United States Attorney for the Northern District of Texas and the District of Delaware and relevant state attorneys general; and
- (s) all entities listed on the service list maintained by the Debtors pursuant to Local Rule 2002-1(c) as of the date of the entry of the Bar Date Order.

17. The Bar Date Notice and Proof of Claim Form will notify parties of the Bar Dates and inform them as to whether they must file a proof of claim, the procedures for preparing and filing a proof of claim, and the consequences of failure to timely file a proof of claim.

18. Notice by Publication. Because notice of the Bar Dates by mail to all potential creditors is impracticable, the Debtors have determined that it is in the best interest of their estates to also provide notice by publication. Pursuant to Bankruptcy Rules 2002(l) and 9008,



the Debtors propose to publish the Bar Date Notice in a form substantially similar to the notice attached hereto as Exhibit C in the national edition of the *New York Times* and the *Fort Worth Star-Telegram* on one occasion within seven (7) days after entry of the Bar Date Order, or as soon as reasonably practicable thereafter.

19. In addition, the Debtors respectfully request authority, but not direction, to publish the Bar Date Notice in local publications of general circulation in certain areas where the Debtors have conducted operations (the "Local Publications"), as the Debtors shall determine in their sole discretion. The Debtors anticipate publishing the Bar Date Notice in the Local Publications, if any, as soon as practicable, but given the limited publication frequency of a number of the Local Publications, publication of the Bar Date Notice may be delayed in publications that publish less frequently. The Debtors request authority to enter into transactions to cause such publication to be made and to make reasonable payments required for such publication. Specifically, despite the Debtors' best efforts to locate address information for all of their potential creditors, there are certain lessors of the Debtors for whom specific address information could not be found. To ensure that that the Debtors make all reasonable efforts to reach such potential creditors, the Debtors propose to publish the Bar Date Notice in Local Publications covering the counties where the properties associated with such leases.<sup>7</sup>

20. The Debtors believe that the vast majority of their creditors will receive at least twenty-one (21) days' notice by publication of the Bar Date Notice in satisfaction of the requirements of Bankruptcy Rule 2002(a)(7). The Bar Date Notice will include a telephone number and an email address for creditors to request paper copies of the Proof of Claim Form, a URL for the website where creditors may obtain copies of the Proof of Claim Form or may

---

<sup>7</sup> Certain of the leases for which lessor address information could not be located includes only longitude or latitude locations for the lease information rather than precise address information. Accordingly, the Debtors believe that publication notice will be appropriate to reach these potential creditors.

submit a proof of claim through the GCG website, and information concerning the procedures for filing proofs of claim.

**F. Proposed Procedures for Preparing and Filing Proofs of Claim**

21. The Debtors further request that the Court establish the following procedures with respect to the completion and filing of proofs of claim:

- (a) Each proof of claim must (i) be written in the English language, (ii) be denominated in United States Dollars, (iii) conform substantially with the Proof of Claim Form or Official Form 10, (iv) indicate the Debtor against which the creditor is asserting a claim (and, if a creditor asserts a claim against more than one Debtor, a separate proof of claim must be filed with respect to each Debtor), and (v) be executed by the individual to whom service of any papers relating to such claim shall be directed.
- (b) Each proof of claim must include supporting documentation (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available; *provided, however,* that a proof of claim may be filed without supporting documentation upon the prior written consent of the Debtors; *provided further* that any creditor that received such written consent shall be required to transmit such documentation to the Debtors upon request no later than seven (7) days from the date of such request.
- (c) Each proof of claim shall be deemed timely filed only if (i) the proof of claim is submitted electronically, so as to be **actually received** by GCG on or before the applicable Bar Date, by using the Online Portal or (ii) the proof of claim is mailed or delivered by courier service or by hand delivery, so as to be **actually received** by GCG on or before the applicable Bar Date at the appropriate address listed below:

**If sent via first class mail:**  
Quicksilver Resources Inc., *et al.*  
c/o GCG  
P.O. Box 10155  
Dublin, OH 43017-3155

**If sent via hand delivery or overnight mail:**  
Quicksilver Resources Inc., *et al.*  
c/o GCG  
5151 Blazer Parkway, Suite A  
Dublin, OH 43017

Under no circumstances should any proof of claim be sent to the Debtors or to the Debtors' legal or financial advisors.

**ANY CREDITOR OR INTEREST HOLDER THAT ELECTRONICALLY FILES A PROOF OF CLAIM OR INTEREST SHALL RETAIN SUCH PROOF OF CLAIM OR INTEREST (AND SUPPORTING DOCUMENTS) WITH AN ORIGINAL SIGNATURE FOR A PERIOD OF NOT LESS THAN TWO (2) YEARS FROM THE DATE THE PROOF OF CLAIM OR INTEREST IS ELECTRONICALLY FILED.**

- (d) **EXCEPT AS EXPRESSLY PERMITTED IN 19(c) ABOVE IN THE CONTEXT OF ELECTRONIC SUBMISSION AT THE ONLINE PORTAL, PROOFS OF CLAIM SENT BY FACSIMILE, TELECOPY, E-MAIL, OR OTHER FORM OF ELECTRONIC SUBMISSION WILL NOT BE ACCEPTED.**
- (e) Upon GCG's receipt of a proof of claim, GCG will send the claimant an acknowledgment email or letter stating the assigned claim number and the date on which GCG received the proof of claim. The acknowledgment email or letter will indicate that the first page of the proof of claim may be viewed at <http://cases.gcginc.com/kwk>. If a creditor wishes to receive a complete, file stamped, copy of such creditor's proof of claim, such creditor may enclose a stamped self-addressed envelope and an extra copy of such creditor's proof of claim.

**G. Parties Required to File Proofs of Claim by the Bar Dates**

22. Except as otherwise set forth in paragraph 23 herein, the Debtors propose that the following persons or entities holding pre-petition claims against the Debtors be required to file a proof of claim on or before the applicable Bar Date:

- (a) any entity whose claim against a Debtor is not listed in the Schedules or whose claim is listed in the Schedules by is listed therein as disputed, contingent, and/or unliquidated and who desires to be treated as a creditor with respect to such claim for purposes of voting and distribution;
- (b) any entity who believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and
- (c) any entity who believes that its claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and who desires to have its claim allowed against a Debtor other than that identified in the Schedules.

**H. Parties Not Required to File Proofs of Claim by the Bar Dates**

23. The Debtors request that the following entities whose claims otherwise would be subject to the Bar Dates **not** be required to file a proof of claim on or before the applicable Bar Date with respect to the claims described in the following subparagraphs:

- (a) any person or entity that has already properly filed, with the Clerk of the Court or GCG, a proof of claim against all Debtors against which such entity has a claim, in a form that substantially conforms to the Proof of Claim Form or Official Form 10;

- (b) any entity whose claim is listed on the Debtors' Schedules, provided that (i) such claim is **not** described as disputed, contingent, or unliquidated, (ii) such entity does **not** dispute the amount, nature, or priority of the claim as set forth in the Debtors' Schedules, and (iii) such entity does **not** dispute that such claim is an obligation of the specific Debtor as set forth in the Debtors' Schedules;
- (c) any entity that holds a claim that has already been allowed by an order of this Court entered on or before the applicable Bar Date;
- (d) any entity whose claim has already been paid in full by any of the Debtors or any other party;
- (e) any direct or indirect non-Debtor subsidiary of the Debtors;
- (f) any Debtor holding a claim against another Debtor;
- (g) any entity that holds a claim allowable under Bankruptcy Code sections 503(b) and 507(a)(2) as an administrative expense (other than any claim allowable under Bankruptcy Code section 503(b)(9), which, despite its priority status, is a pre-petition claim and subject to the General Bar Date as set forth above to the extent that such claim has not been paid);
- (h) any entity that holds an interest in any of the Debtors, which interest is based exclusively upon the ownership of common stock, preferred stock, membership interests, partnership interests, or rights to purchase, sell, or subscribe to such an interest; *provided, however*, that interest holders who wish to assert claims (as opposed to ownership interests) against any of the Debtors, including claims that arise out of or relate to the ownership or purchase of an interest, must file proofs of claim on or before the applicable Bar Date unless another exception identified herein applies;<sup>8</sup>
- (i) current officers and directors of the Debtors asserting claims for indemnification and/or contribution arising as a result of such officers' or directors' pre-petition or post-petition services to the Debtors;
- (j) any person or entity holding a claim payable to the Court or the U.S. Trustee Program pursuant to 28 U.S.C. § 1930;
- (k) any employee whose claim was previously authorized by order of this Court to be satisfied by the Debtors in the ordinary course of business as a wage or benefit; *provided, however*, that such employee must submit a proof of claim by the General Bar Date if such employee disputes the amount of his or her previously authorized claim or if his or her claim relates to damages arising from claims for wrongful termination, discrimination, or workers' compensation insurance, and
- (l) claims that are limited exclusively to the repayment of principal, interest and/or other applicable fees and charges (a "Debt Claim") owed under any bond or note issued by the Debtors pursuant to an indenture (a "Debt

---

<sup>8</sup> The Debtors reserve all rights with respect to any such claims, including to, *inter alia*, assert that such claims are subject to subordination pursuant to Bankruptcy Code section 510(b).

Instrument"); *provided, however*, that: (i) other than as set forth in subparagraph (m), hereof, an indenture trustee under a Debt Instrument (the "Indenture Trustee") must file one Proof of Claim, on or before the General Bar Date, with respect to all of the amounts owed under each of the Debt Instruments and such Proof of Claim shall be deemed to be asserted by the Indenture Trustee against every Debtor that is liable for the Debt Claim, without the necessity of filing separate Proofs of Claim against each Debtor, without the necessity of filing separate Proofs of Claim against each Debtor, so long as the Proof of Claim sets forth in reasonable detail the basis and amount of the claim asserted against each Debtor, and (ii) any holder of a Debt Claim wishing to assert a claim, other than a Debt Claim, arising out of or relating to a Debt Instrument must file a Proof of Claim on or before the General Bar Date, unless another exception in this paragraph applies;

- (m) holders of the claims listed in (1) through (4) below shall not be required to file a proof of claim with respect to any obligations under the specified credit documents or any agreements related thereto. Instead, the Debtors' stipulations set forth in paragraph 4 of the Cash Collateral Order shall be deemed a timely filed proof of claim on behalf of such holders.
- (1) The administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended, supplemented or otherwise modified, the "U.S. Credit Agreement");
  - (2) the administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended and supplemented or otherwise modified, the "Canadian Credit Agreement");
  - (3) the administrative agent and lenders under the Second Lien Credit Agreement, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the "Second Lien Credit Agreement"); and
  - (4) the indenture trustee and holders of notes issued under the Indenture, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the "Second Lien Indenture" and 1-4, collectively, the "Secured Debt Documents").

Notwithstanding the foregoing, each of (x) the administrative agent for (1) the U.S. Credit Agreement, (2) the Canadian Credit Agreement and (3) the Second Lien Credit Agreement and (y) the indenture trustee for the Second Lien Indenture shall be entitled (but not required) to file one consolidated, master proof of claim (a "Master Proof of Claim") against all Debtors with respect to any claims arising out of the Secured Debt Documents, as applicable, or any related documents. The Master Proof of Claim need not identify individual lenders or noteholders and need not specify

advisors' fees or any other fees, costs, or expenses incurred after the Petition Date.

**I. Consequences of Failure to File a Proof of Claim**

24. Pursuant to Bankruptcy Rule 3003(c)(2), the Debtors propose that any holder of a claim against any of the Debtors who is required, but fails, to file a proof of claim in accordance with the Bar Date Order on or before the applicable Bar Date shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution.

25. The Debtors request that the Court approve the proposed notice procedures and find that notice of the Bar Dates in the manner set forth herein constitutes good, adequate, and sufficient notice of the Bar Dates and satisfies the requirements of the Bankruptcy Code, Bankruptcy Rules, and Local Rules.

**RELIEF REQUESTED**

26. By this motion, the Debtors seek entry of the Bar Date Order (i) establishing deadlines for filing proofs of claim in these chapter 11 cases; (ii) approving the proposed Proof of Claim Form tailored to these chapter 11 cases attached hereto as **Exhibit B**; (iii) approving the proposed procedures for filing proofs of claim in these chapter 11 cases; (iv) approving the Bar Date Notice attached hereto as **Exhibit C**; and (v) approving the cover letters attached here to as **Exhibits D-1, D-2, D-3 and D-4**; and (v) approving the proposed manner of service and publication of the Bar Date Notice.

**SUPPORTING AUTHORITY**

**A. The Bar Dates**

27. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which proofs of claim must be filed in a chapter 11 case. Fed. R. Bankr. P. 3003(c)(3). Bankruptcy Rule 3003(c)(2) further provides that any creditor whose claim is not scheduled on a debtor's schedule of liabilities or whose claim is listed on such schedule as disputed, contingent,

or unliquidated, must file a proof of claim. Otherwise such creditor shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution. Fed. R. Bankr. P. 3003(c)(2). In addition, Bankruptcy Code section 502(b)(9) provides that “a claim of a governmental unit shall be timely filed if it is filed before 180 days after the date of the order for relief . . . .” 11 U.S.C. § 502(b)(9).

28. Bankruptcy Rule 2002(p)(2) grants creditors with a foreign address to which notices are mailed at least thirty (30) days’ notice of the time within which to file proofs of claims if notice is mailed to the foreign address, unless the court for cause orders otherwise. The court may shorten the additional notice time provided to creditors with foreign addresses if the circumstances of a debtor’s case so warrant.

29. Claims bar dates play an essential role in the twin goals of bankruptcy, i.e., preserving going concerns and maximizing property available to satisfy creditors. *See Bank of Am. Nat’l Trust & Sav. Assoc. v. 203 N. LaSalle St. P’ship*, 526 U.S. 434, 453 (1999). Claims bar dates allow the debtor and parties in interest to expeditiously determine and evaluate the liabilities of the estate and develop a sound plan of reorganization. Prolonged uncertainty regarding claims would delay and potentially derail this process, undercutting “one of the principal purposes of bankruptcy law, to secure within a limited period the prompt and effectual administration and settlement of the debtor’s estate.” *Chemetron Corp. v. Jones*, 72 F.3d 341, 346 (3d Cir. 1995) (citation omitted).

30. Establishing the Bar Dates as described herein is critical to these chapter 11 cases. The Bar Dates proposed by the Debtors comply with all applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules and are reasonable and necessary for the efficient administration of these chapter 11 cases. Moreover, as discussed below, under the

circumstances of these chapter 11 cases, the Bar Dates provide creditors ample time to prepare and file their proofs of claim. Accordingly, the Debtors respectfully request that the Bar Dates be established pursuant to the Bar Date Order.

**B. The Proposed Proof of Claim Form and the Proposed Bar Date Notice**

31. Pursuant to Bankruptcy Rule 3001(a), a proof of claim must conform substantially to Official Form 10. *See* Fed. R. Bankr. P. 3001(a). In this case, the Proof of Claim Form substantially conforms to Official Form 10 and includes certain substantive modifications intended to facilitate filing proofs of claim in the chapter 11 cases. The Bar Date Notice is easy to comprehend, provides clear notice of the Bar Dates, and contains information regarding who must file a proof of claim, instructions for completing a proof of claim, procedures for filing a proof of claim, and consequences of failure to timely file a proof of claim. The Proof of Claim Form, as well as the personalized information therein, will reduce delay, confusion, and expense and facilitate the matching of scheduled and filed claims while providing each creditor with the opportunity to correct any missing, incorrect, or incomplete information. The Proof of Claim Form is similar to those used effectively in other large and complex cases, is reasonable and appropriate in the context of these chapter 11 cases, and should be approved.

**C. The Bar Date Notice Procedures**

32. Bankruptcy Rule 2002(a)(7) requires that the Debtors provide creditors at least twenty-one (21) days' notice by mail of the time fixed for filing proofs of claim pursuant to Bankruptcy Rule 3003(c). Fed. R. Bankr. P. 2002(a)(7). Bankruptcy Rule 2002(p)(2) grants creditors with a foreign address to which notices are mailed at least thirty (30) days' notice of the time within which to file proofs of claims if notice is mailed to the foreign address, unless the Court orders otherwise. The Court may shorten the additional notice time provided to creditors with foreign addresses if the circumstances of a debtor's case so warrant. Pursuant to Local Rule



2002-1(e), upon entry of a bar date order, a debtor must serve actual written notice of the bar date on (i) all known creditors and their counsel (if known), (ii) all parties on the service list described in Local Rule 2002-1(c), (iii) all equity security holders, (iv) indenture trustees, (v) the U.S. Trustee, and (vi) all taxing authorities for the jurisdictions in which the debtor does business. Del. Bankr. L.R. 2002-1(e).

33. Additionally, Bankruptcy Rule 2002(l) provides that the Court may order notice by publication if it finds that notice by mail is impracticable or that it is desirable to supplement the notice. Fed. R. Bankr. P. 2002(l). Bankruptcy Rule 9008 provides that the Court shall determine the form and manner of notice by publication, including the newspapers or other medium to be used and the number of publications. Fed. R. Bankr. P. 9008.

34. The relief requested herein provides for clear notice of the Bar Dates. Specifically, the Debtors intend to mail the Bar Date Notice to the Notice Parties within two (2) business days after entry of the Bar Date Order, or as soon as reasonably practicable thereafter, establish the General Bar Date on a date that is at least thirty (30) days after the Bar Date Notice is served, and provide notice by publication within seven (7) days after entry of the Bar Date Order, or as soon as reasonably practicable thereafter. Having determined that notice of the Bar Dates by mail to all potential creditors is impracticable, the Debtors propose to publish the Bar Date Notice in those publications that, in their business judgment, are most likely to reach an audience of creditors that may hold claims unknown to the Debtors. By establishing the Bar Dates in accordance with the provisions hereof, all known claimants will have thirty (30) days of mailed notice, and unknown or unreachable claimants will have twenty-one (21) days of constructive notice of the General Bar Date for filing their proofs of claim, thereby more than satisfying Bankruptcy Rule 2002(a)(7), which requires twenty-one (21) days' notice.

Additionally, as discussed above, Rule 2002(p)(2) grants creditors with foreign addresses at least thirty (30) days' notice of the time fixed for filing proofs of claims. The Notice of the Bar Dates proposed herein complies with Rule 2002(p)(2).

35. In addition, pursuant to Local Rule 1009-2, in the event that the Debtors amend or supplement their Schedules subsequent to the date on which the Debtors serve the Bar Date Notice, the Debtors shall provide notice of such amendment or supplement to the holders of claims affected thereby within fourteen (14) days of such amendment or supplement, and such holders shall be afforded at least thirty (30) days from the date on which such notice is given to file proofs of claim in respect of their claim.

36. The Debtors also propose that any entity that holds a claim that arises from the rejection of an executory contract or unexpired lease be required to file a proof of claim on or before the later of either the General Bar Date or thirty (30) days after entry of the order authorizing the rejection of the respective contract or lease, unless otherwise provided by order of the Court.

37. The Debtors believe that the notice procedures described herein are "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action" and the requirement of filing a proof of claim by the applicable Bar Date. *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950). Accordingly, the Debtors respectfully request that the Court find that the Debtors' proposed notice procedures be deemed good, adequate, and sufficient notice. *See, e.g., In re Altegrity, Inc.*, No 15-10226 (LSS) (Bankr. D. Del. March 20, 2015) (approving a general bar date providing 30 days' notice to creditors); *In re Heartland Publ'ns, LLC*, No. 09-14459 (KG) (Bankr. D. Del. Mar. 12, 2010) (30 days); *In re G.I. Joes Holding Corp.*, No. 09-10713 (KG) (20 days); *In re J.L. French Automotive*

*Castings, Inc.*, No. 09-12445 (KG) (Bankr. D. Del. Aug. 17, 2009) (23 days); *In re NV Broadcasting, LLC*, No. 09-12473 (KG) (Bankr. D. Del. Aug. 5, 2009) (25 days).

38. Based on the foregoing, the Debtors submit that the relief requested herein is necessary and appropriate, is in the best interests of their estates and creditors, and should be granted in all respects.

**NOTICE**

39. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors have provided notice of this motion to (a) the Office of the United States Trustee for the District of Delaware, Attn: Jane Leamy, Esq.; (b) counsel to the Official Committee of Unsecured Creditors; (c) counsel to the agents under the Debtors' pre-petition credit facilities; (d) counsel to the Ad Hoc Group of Second Lienholders; (e) counsel to the indenture trustees under the Debtors' pre-petition indentures; (f) the United States Securities and Exchange Commission; (g) the United States Internal Revenue Service; and (h) any parties entitled to notice pursuant to Local Rule 2002-1(b). In light of the nature of the relief requested in this Motion, the Debtors respectfully submit that no further notice is necessary.

*[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]*

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Bar Date Order substantially in the form annexed as **Exhibit A** hereto (i) establishing the Bar Dates; (ii) approving the Proof of Claim Form; (iii) approving the proposed procedures for filing proofs of claim in these chapter 11 cases; (iv) approving the Bar Date Notice; and (v) approving the manner of service and publication of the Bar Date Notice; and (b) grant such other and further relief as is just.

Wilmington, Delaware  
Date: May 19, 2015

/s/ Amanda R. Steele

**RICHARDS, LAYTON & FINGER, P.A.**

Paul N. Heath (DE 3704)  
Amanda R. Steele (DE 5530)  
Rachel L. Biblo (DE 6012)  
One Rodney Square  
920 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701

– and –

**AKIN GUMP STRAUSS HAUER & FELD LLP**

Charles R. Gibbs (admitted *pro hac vice*)  
Sarah Link Schultz (admitted *pro hac vice*)  
Sarah J. Crow (*pro hac vice* admission pending)  
1700 Pacific Avenue, Suite 4100  
Dallas, Texas 75201  
Telephone: (214) 969-2800  
Facsimile: (214) 969-4343

Ashleigh L. Blaylock (admitted *pro hac vice*)  
Robert S. Strauss Building  
1333 New Hampshire Avenue, N.W.  
Washington, DC 20036-1564  
Telephone: (202) 887-4000  
Facsimile: (202) 887-4288

**COUNSEL FOR DEBTORS AND DEBTORS IN  
POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:	)	
	)	Chapter 11
	)	
Quicksilver Resources Inc., <u>et al.</u> , <sup>1</sup>	)	Case No. 15-10585 (LSS)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Hearing Date: June 9, 2015 at 10:00 a.m. (EDT)</b>
	)	<b>Obj. Deadline: June 2, 2015 at 4:00 p.m. (EDT)</b>

---

**NOTICE OF MOTION AND HEARING**

PLEASE TAKE NOTICE that, on May 19, 2015, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of an Order Establishing Deadlines and Procedures for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be filed in writing with the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel for the Debtors on or before **June 2, 2015 at 4:00 p.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE that, if an objection is timely filed, served and received and such objection is not otherwise timely resolved, a hearing to consider such objection and the Motion will be held before The Honorable Laurie Selber Silverstein at the

---

<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: Quicksilver Resources Inc. [6163]; Barnett Shale Operating LLC [0257]; Cowtown Drilling, Inc. [8899]; Cowtown Gas Processing L.P. [1404]; Cowtown Pipeline Funding, Inc. [9774]; Cowtown Pipeline L.P. [9769]; Cowtown Pipeline Management, Inc. [9771]; Makarios Resources International Holdings LLC [1765]; Makarios Resources International Inc. [7612]; QPP Holdings LLC [0057]; QPP Parent LLC [8748]; Quicksilver Production Partners GP LLC [2701]; Quicksilver Production Partners LP [9129]; and Silver Stream Pipeline Company LLC [9384]. The Debtors’ address is 801 Cherry Street, Suite 3700, Unit 19, Fort Worth, Texas 76102.

Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801  
on **June 9, 2015 at 10:00 a.m. (Eastern Daylight Time)**.

**IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Wilmington, Delaware  
Date: May 19, 2015

*/s/ Amanda R. Steele*

---

**RICHARDS, LAYTON & FINGER, P.A.**

Paul N. Heath (DE 3704)  
Amanda R. Steele (DE 5530)  
Rachel L. Biblo (DE 6012)  
One Rodney Square  
920 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701

– and –

**AKIN GUMP STRAUSS HAUER & FELD LLP**

Charles R. Gibbs (admitted *pro hac vice*)  
Sarah Link Schultz (admitted *pro hac vice*)  
Sarah J. Crow (*pro hac vice* admission pending)  
1700 Pacific Avenue, Suite 4100  
Dallas, Texas 75201  
Telephone: (214) 969-2800  
Facsimile: (214) 969-4343

Ashleigh L. Blaylock (admitted *pro hac vice*)  
Robert S. Strauss Building  
1333 New Hampshire Avenue, N.W.  
Washington, DC 20036-1564  
Telephone: (202) 887-4000  
Facsimile: (202) 887-4288

**COUNSEL FOR DEBTORS AND DEBTORS IN  
POSSESSION**

**Exhibit A**

**Proposed Bar Date Order**





having found and determined that the relief sought in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED:

1. The Motion is granted to the extent provided herein.
2. Except as otherwise provided herein, each entity<sup>3</sup> that asserts a claim<sup>4</sup> against any Debtor that arose on or prior to **March 17, 2015** (the "Petition Date"), is required to either (i) file an electronic proof of claim using the Online Portal or (ii) file an original, written proof of such claim that substantially conforms to the form proof of claim attached to the Motion as **Exhibit B** (the "Proof of Claim Form") or Official Form 10, so as to be **actually received** on or before **July 31, 2015 at 5:00 p.m. prevailing Eastern Time** (the "General Bar Date").
3. The deadline by which a governmental unit (as defined in Bankruptcy Code section 101(27)) may file a proof of claim is **September 14, 2015 at 5:00 p.m. prevailing Eastern Time** (the "Government Bar Date").
4. Any entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a proof of claim with respect to such claim on or before the later of either (i) the General Bar Date or (ii) a date provided in an order of the Court authorizing the rejection of such executory contract or unexpired lease, or if no date is provided, thirty (30) days after entry of the order authorizing such rejection.
5. If the Debtors amend or supplement their schedules of liabilities subsequent to service of the Bar Date Notice (as defined below) in a manner that changes the amount, nature,

---

<sup>3</sup> The term "entity" as used herein shall have the meaning defined in Bankruptcy Code section 101(15).

<sup>4</sup> The term "claim" as used herein shall have the meaning defined in Bankruptcy Code section 101(5).

classification, or characterization of a debt owing to a creditor, and the affected creditor does not agree with such amendment or supplement, then the affected creditor must file a proof of claim with respect to such debt on the later of (i) the applicable Bar Date or (ii) thirty (30) days after the date on which the Debtors provided notice of such amendment or supplement (or another time period as may be fixed by the Court) (the “Amended Schedule Bar Date”).

6. Except as set forth in paragraph 7 herein, the following entities are required to file a proof of claim on or before the applicable Bar Date:

- (a) any entity whose claim against a Debtor is not listed in the Schedules or whose claim is listed in the Schedules is listed therein as disputed, contingent, and/or unliquidated and who desires to be treated as a creditor with respect to such claim for purposes of voting and distribution;
- (b) any entity who believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and
- (c) any entity who believes that its claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and who desires to have its claim allowed against a Debtor other than that identified in the Schedules.

7. Notwithstanding the foregoing, the following persons or entities are **not** required to file a proof of claim on or before the applicable Bar Date with respect to claims described below:

- (a) any entity that has already properly filed, with the Clerk of the Court or GCG, a proof of claim against all Debtors against which such entity has a claim, in a form that substantially conforms to the Proof of Claim Form or Official Form 10;
- (b) any entity whose claim is listed on the Debtors’ Schedules, provided that (i) such claim is **not** described as disputed, contingent, or unliquidated, (ii) such entity does **not** dispute the amount, nature, or priority of the claim as set forth in the Debtors’ Schedules, and (iii) such entity does **not** dispute that such claim is an obligation of the specific Debtor as set forth in the Debtors’ Schedules;
- (c) any entity that holds a claim that has already been allowed by an order of this Court entered on or before the applicable Bar Date;
- (d) any entity whose claim has already been paid in full by any of the Debtors or any other party;
- (e) any direct or indirect non-Debtor subsidiary of the Debtors;

- (f) any Debtor holding a claim against another Debtor;
- (g) any entity that holds a claim allowable under Bankruptcy Code sections 503(b) and 507(a)(2) as an administrative expense (other than any claim allowable under Bankruptcy Code section 503(b)(9), which, despite its priority status, is a pre-petition claim and subject to the General Bar Date as set forth above to the extent that such claim has not been paid);
- (h) any entity that holds an interest in any of the Debtors, which interest is based exclusively upon the ownership of common stock, preferred stock, membership interests, partnership interests, or rights to purchase, sell, or subscribe to such an interest; *provided, however*, that interest holders who wish to assert claims (as opposed to ownership interests) against any of the Debtors, including claims that arise out of or relate to the ownership or purchase of an interest, must file proofs of claim on or before the applicable Bar Date unless another exception identified herein applies;<sup>5</sup>
- (i) current officers and directors of the Debtors asserting claims for indemnification and/or contribution arising as a result of such officers' or directors' pre-petition or post-petition services to the Debtors;
- (j) any entity holding a claim payable to the Court or the U.S. Trustee Program pursuant to 28 U.S.C. § 1930;
- (k) any employee whose claim was previously authorized by order of this Court to be satisfied by the Debtors in the ordinary course of business as a wage or benefit; *provided, however*, that such employee must submit a proof of claim by the General Bar Date if such employee disputes the amount of his or her previously authorized claim or if his or her claim relates to damages arising from claims for wrongful termination, discrimination, or workers' compensation insurance;
- (l) claims that are limited exclusively to the repayment of principal, interest and/or other applicable fees and charges (a "Debt Claim") owed under any bond or note issued by the Debtors pursuant to an indenture (a "Debt Instrument"); *provided, however*, that: (i) other than as set forth in subparagraph (m), hereof, an indenture trustee under a Debt Instrument (the "Indenture Trustee") must file one Proof of Claim, on or before the General Bar Date, with respect to all of the amounts owed under each of the Debt Instruments and such Proof of Claim shall be deemed to be asserted by the Indenture Trustee against every Debtor that is liable for the Debt Claim, without the necessity of filing separate Proofs of Claim against each Debtor, without the necessity of filing separate Proofs of Claim against each Debtor, so long as the Proof of Claim sets forth in reasonable detail the basis and amount of the claim asserted against each Debtor, and (ii) any holder of a Debt Claim wishing to assert a claim, other than a Debt Claim, arising out of or relating to a Debt Instrument must file a Proof of Claim on or before the General Bar Date, unless another exception in this paragraph applies; and
- (m) Parties listed in (1) through (4) below shall not be required to file a proof of claim with respect to any obligations under the specified credit documents or any agreements related thereto. Instead, the Debtors' stipulations set forth in

---

<sup>5</sup> The Debtors reserve all rights with respect to any such claims, including to, *inter alia*, assert that such claims are subject to subordination pursuant to Bankruptcy Code section 510(b).

paragraph 4 of the final Cash Collateral Order shall be deemed a timely filed proof of claim on behalf of such holders.

- (1) The administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended, supplemented or otherwise modified, the “U.S. Credit Agreement”);
- (2) the administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended and supplemented or otherwise modified, the “Canadian Credit Agreement”);
- (3) the administrative agent and lenders under the Second Lien Credit Agreement, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the “Second Lien Credit Agreement”); and
- (4) the indenture trustee and holders of notes issued under the Indenture, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the “Second Lien Indenture”).

Notwithstanding the foregoing, each of (x) the administrative agent for (1) the U.S. Credit Agreement, (2) the Canadian Credit Agreement and (3) the Second Lien Credit Agreement and (y) the indenture trustee for the Second Lien Indenture shall be entitled (but not required) to file one consolidated, master proof of claim (a “Master Proof of Claim”) against all Debtors with respect to any claims arising out of the Secured Debt Documents, as applicable, or any related documents. The Master Proof of Claim need not identify individual lenders or noteholders and need not specify advisors’ fees or any other fees, costs, or expenses incurred after the Petition Date.

8. The Proof of Claim Form, substantially in the form attached to the Motion as **Exhibit B**, is approved in all respects, and the Debtors are directed, with the assistance of GCG, to include the following information on every Proof of Claim Form that they provide to a creditor, to the extent that such information is reflected on Schedules: (a) the amount of such creditor’s claim against the applicable Debtor, (b) the type of claim held by such creditor (i.e., non-priority unsecured, priority unsecured, or secured), and (c) whether such claim is contingent, unliquidated, or disputed. Any entity who desires to rely on the Schedules will have the responsibility for determining that their claim is accurately listed on such Schedules and is

authorized to correct any information contained in the Proof of Claim Form that is missing, incorrect, or incomplete.

9. The following procedures shall govern the completion and filing of proofs of claim:

- (a) Each proof of claim must (i) be written in the English language, (ii) be denominated in U.S. Dollars, (iii) conform substantially with the Proof of Claim Form or Official Form 10, (iv) indicate the Debtor against which the creditor is asserting a claim (and if a creditor asserts a claim against more than one Debtor, a separate proof of claim must be filed with respect to each Debtor), and (v) be executed by the individual to whom service of any papers relating to such claim shall be directed.
- (b) Each proof of claim must include supporting documentation (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available; *provided, however*, that a proof of claim may be filed without supporting documentation upon the prior written consent of the Debtors; *provided further* that any creditor that received such written consent shall be required to transmit such documentation to the Debtors upon request no later than seven (7) days from the date of such request.
- (c) Each proof of claim shall be deemed timely filed only if (i) the proof of claim is submitted electronically, so as to be **actually received** by GCG on or before the applicable Bar Date, by utilizing the Online Portal that can be accessed at GCG's website: <http://www.gardencitygroup.com/cases/kwk> or (ii) the proof of claim is mailed or delivered by courier service or hand delivery, so as to be **actually received** by GCG on or before the applicable Bar Date at the appropriate address listed below:

**If sent via first class mail:**

Quicksilver Resources Inc., *et al.*  
c/o GCG  
P.O. Box 10155  
Dublin, OH 43017-3155

**If sent via hand delivery or overnight mail:**

Quicksilver Resources Inc., *et al.*  
c/o GCG  
5151 Blazer Parkway, Suite A  
Dublin, OH 43017

**ANY CREDITOR OR INTEREST HOLDER THAT ELECTRONICALLY FILES A PROOF OF CLAIM OR INTEREST SHALL RETAIN SUCH PROOF OF CLAIM OR INTEREST (AND SUPPORTING DOCUMENTS) WITH AN ORIGINAL SIGNATURE FOR A PERIOD OF NOT LESS THAN TWO (2) YEARS FROM THE DATE THE PROOF OF CLAIM OR INTEREST IS ELECTRONICALLY FILED.**

- (d) **EXCEPT AS EXPRESSLY PERMITTED IN C.9(c) ABOVE IN THE CONTEXT OF ELECTRONIC SUBMISSION AT THE ONLINE PORTAL, PROOFS OF CLAIM SENT BY FACSIMILE, TELECOPY, E-MAIL, OR OTHER FORM OF ELECTRONIC SUBMISSION WILL NOT BE ACCEPTED.**

- (e) Upon GCG's receipt of a proof of claim, GCG will send the claimant an acknowledgment email or letter stating the assigned claim number and the date on which GCG received the proof of claim. The acknowledgment email or letter will indicate that the entire filed proof of claim may be viewed at <http://cases.gcginc.com/kwk>. If a creditor wishes to receive a complete, file stamped, copy of such creditor's proof of claim, such creditor may enclose a stamped self-addressed envelope and an extra copy of such creditor's proof of claim.

**10. Any holder of a claim against any of the Debtors who is required, but fails, to file a proof of claim in accordance with the terms of this Order on or before the applicable Bar Date shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution.**

11. The notice of the Bar Dates and relief granted in this Order, substantially in the form attached to the Motion as **Exhibit C** (the "**Bar Date Notice**"), is approved in all respects.

12. The cover letters to be included with the Bar Date Notice, as applicable, substantially in the form attached to the Motion as **Exhibits D-1, D-2, D-3 and D-4** are approved in all respects.

13. The Debtors, with the assistance of GCG, are authorized and directed to serve the Bar Date Notice by First-Class U.S. mail, postage prepaid, within two (2) business days after the date of entry of this Order, or as soon as reasonably practicable thereafter, upon the following parties (the "**Notice Parties**"):

- (a) all creditors and other known holders of claims as of the date of entry of the Bar Date Order, including all entities listed on the Debtors' schedules of liabilities at the addresses stated therein;
- (b) all parties to litigation with any of the Debtors as of the date of entry of the Bar Date Order;
- (c) the U.S. Trustee;
- (d) counsel to the Official Committee of Unsecured Creditors;
- (e) counsel to the agents and lenders under the U.S. Credit Agreement, Canadian Credit Agreement, Second Lien Credit Agreement, and Second Lien Indenture;

- (f) counsel to the Ad Hoc Group of Second Lienholders (as defined in the Cash Collateral Order);
- (g) counsel to the indenture trustees under the Debtors' pre-petition indentures;
- (h) all entities that have filed a proof of claim;
- (i) all holders of an equity interest in the Debtors;
- (j) all parties to executory contracts and unexpired leases of the Debtors;
- (k) the Debtors' current officers, directors, and employees;
- (l) the Internal Revenue Service;
- (m) all applicable state and local taxing authorities;
- (n) the United States Securities and Exchange Commission;
- (o) the United States Environmental Protection Agency;
- (p) any applicable state environmental agency;
- (q) the United States Department of Justice;
- (r) the United States Attorney for the Northern District of Texas and the District of Delaware and relevant state attorneys general; and
- (s) all entities listed on the service list maintained by the Debtors pursuant to Local Rule 2002-1(c) as of the date of the entry of the Bar Date Order.

14. Pursuant to Bankruptcy Rules 2002(l) and 9008, the Court finds that notice of the Bar Dates by mail to all potential creditors is impracticable. Therefore, the Debtors are authorized and directed to give notice of the Bar Dates by publishing the Bar Date Notice, modified for publication in the national edition of the *New York Times* and the *Fort Worth Star-Telegram* on one occasion within seven (7) days after entry of the Bar Date Order, or as soon as reasonably practicable thereafter. The Debtors are also authorized, but not directed, to publish the Bar Date Notice at such times and in such local publications of general circulation in certain areas where the Debtors have conducted operations (the "Local Publications"), as the Debtors shall determine in their sole discretion. The published Bar Date Notice shall include a telephone number and an email address for creditors to request copies of the Proof of Claim Form, a URL



for the website where creditors may obtain copies of the Proof of Claim Form, and information concerning the procedures for filing proofs of claim. The Debtors are authorized to enter into transactions to cause such publication to be made and to make reasonable payments required for such publication.

15. The Debtors are authorized to enter into such transactions to effectuate the publication of the Bar Date Notice as provided herein, including making reasonable payments required for such publication and causing the translation of the Bar Date Notice into such foreign languages as they deem appropriate.

16. The Debtors are authorized to provide notice to their creditors with foreign addresses by electronic means, such as email or facsimile, for which the Debtors have or can reasonably ascertain electronic contact information.

17. The Debtors are authorized to use the services of GCG, as applicable, to coordinate the processing of proofs of claim.

18. GCG shall prominently display the bar date on its website at <http://www.gardencitygroup.com/cases/kwk> within two (2) days of entry of this Order.

19. The form and manner of the Bar Date Notice and the relief granted by this Order, as provided herein, constitutes good, adequate, and sufficient notice thereof, satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules and is approved in all respects.

20. The Debtors and GCG are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

21. Entry of this Order is without prejudice to the rights of the Debtors to seek a further order of this Court fixing a date by which holders of claims not subject to the Bar Dates established herein must file proofs of such claims or be barred from doing so.

22. Nothing in this Order shall prejudice the right of any party in interest to (i) object to any proof of claim, whether filed or scheduled, on any grounds; (ii) dispute or assert offsets or defenses to any claims reflected on the Debtors' schedules of liabilities or any amendments thereto, as to amount, liability, classification, or otherwise; or (iii) subsequently designate any claim as disputed, contingent, unliquidated, or undetermined.

23. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

24. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Wilmington, Delaware

Date: June \_\_\_\_, 2015

---

The Honorable Laurie Selber Silverstein  
United States Bankruptcy Judge

**Exhibit B**

**Proposed Proof of Claim Form**



**8. Documents:** Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #8, and the definition of "redacted".)

IF SUBMITTING HARD COPIES OF DOCUMENTS, DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

**9. Signature:** (See instruction #9) Check the appropriate box.

I am the creditor.  I am the creditor's authorized agent.  I am the trustee, or the Debtor, or their authorized agent. (See Bankruptcy Rule 3004.)  I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: \_\_\_\_\_  
 Title: \_\_\_\_\_ (Signature) \_\_\_\_\_ (Date)  
 Company: \_\_\_\_\_  
 Address and telephone number (if different from notice address above):  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Telephone number: \_\_\_\_\_ Email address: \_\_\_\_\_

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

**INSTRUCTIONS FOR PROOF OF CLAIM FORM**

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the Debtor, exceptions to these general rules may apply. The attorneys for the Debtors and their court-appointed claims agent, Garden City Group, LLC ("GCG"), are not authorized and are not providing you with any legal advice.

IF SUBMITTING A HARD COPY OF A PROOF OF CLAIM FORM, PLEASE SEND YOUR ORIGINAL, COMPLETED CLAIM FORM AS FOLLOWS: IF BY MAIL: QUICKSILVER RESOURCES INC., ET AL., C/O GCG, P.O. BOX 10155, DUBLIN, OH 43017-3155. IF BY HAND OR OVERNIGHT COURIER: QUICKSILVER RESOURCES INC., ET AL., C/O GCG, 5151 BLAZER PARKWAY, SUITE A, DUBLIN, OH 43017. ANY PROOF OF CLAIM SUBMITTED BY FACSIMILE OR EMAIL WILL NOT BE ACCEPTED. IF YOU HAVE SUBMITTED THIS PROOF OF CLAIM FORM ELECTRONICALLY, YOU DO NOT NEED TO SUBMIT THIS FORM. PLEASE RETAIN A COPY FOR YOUR RECORDS.

THE GENERAL BAR DATE IN THESE CHAPTER 11 CASES IS \_\_\_\_\_, 2015 AT \_\_:00 \_\_M. (PREVAILING EASTERN TIME)

**Items to be completed in Proof of Claim Form**

**Court, Name of Debtor, and Case Number:**  
 These chapter 11 cases were commenced in the United States Bankruptcy Court for the District of Delaware on March 17, 2015 (the "Petition Date"). You should select the Debtor against which you are asserting your claim.

**A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR.**

**Creditor's Name and Address:**

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. Please provide us with a valid email address. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

**1. Amount of Claim as of Date Case Filed:**

State the total amount owed to the creditor on the Petition Date. Follow the instructions concerning whether to complete items 4, 5 and 6. Check the box if interest or other charges are included in the claim.

**2. Basis for Claim:**

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to your claim.

**3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:** State only the last four digits of the Debtor's account or other number used by the creditor to identify the Debtor.

**3a. Debtor May Have Scheduled Account As:**

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the Debtor.

**3b. Uniform Claim Identifier:**

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

**4. Secured Claim:**

Check whether the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

**5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a):**

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

**6. Claim Pursuant to 11 U.S.C. § 503 (b)(9):**

If you have a claim arising from the value of any goods received by the Debtor within 20 days before March 17, 2015, the date of commencement of the above cases, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business, state the amount of such claim and attach documentation supporting such claim. (See DEFINITIONS, below.)

**7. Credits:**

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the Debtor credit for any payments received toward the debt.

**8. Documents:**

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement or secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. If submitting hard copies of documents, do not send original documents, as attachments may be destroyed after scanning.

**9. Date and Signature:**

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, attach a complete copy of any power of attorney, and provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

**DEFINITIONS****Debtor**

A Debtor is the person, corporation, or other entity that has filed a bankruptcy case.

**Creditor**

A creditor is the person, corporation, or other entity to whom the Debtor owes a debt that was incurred before the date of the bankruptcy filing. See 11 U.S.C. § 101(10).

**Claim**

A claim is the creditor's right to receive payment for a debt owed by the Debtor on the date of the bankruptcy filing. See 11 U.S.C. § 101(5). A claim may be secured or unsecured.

**Proof of Claim**

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the Debtor on the date of the bankruptcy filing. The creditor must file the form with GCG as described in the instructions above and in the Bar Date Notice.

**Section 503(b)(9) Claim**

A Section 503(b)(9) claim is a claim for the value of any goods received by the Debtor within 20 days before the date of commencement of a bankruptcy case in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business.

**Secured Claim Under 11 U.S.C. § 506(a)**

A secured claim is one backed by a lien on property of the Debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a Debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the Debtor money (has a right to setoff).

**Unsecured Claim**

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

**Claim Entitled to Priority Under 11 U.S.C. § 507(a)**

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

**Redacted**

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

**INFORMATION****Evidence of Perfection**

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

**Acknowledgment of Filing of Claim**

If you are submitting your proof of claim form in hard copy and you would like to receive a date-stamped copy of your claim, please provide a self-addressed stamped envelope and a copy of your proof of claim form when you submit the original to GCG. You will also receive an acknowledgment letter from GCG after your proof of claim form has been processed. If you are submitting your proof of claim electronically, you will receive an email confirmation of your claim submission. You will also be provided with an electronically date stamped PDF of your claim. You may print and retain a copy of this document for your records.

**Offers to Purchase a Claim**

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the Debtor. These entities do not represent the bankruptcy court or the Debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.

**Display of Proof of Claim on Case Administration Website**

As the official claims agent, and in accordance with Federal Bankruptcy Rule 9037(g), GCG will display the first page of your proof of claim form on the case administration website. Please be aware that any personal information not otherwise redacted on your proof of claim form will be displayed over the Internet.

**ATTACHMENT A**

## List of Debtors and Case Numbers

Indicate on the face of the Proof of Claim form the Debtor against which you assert a claim.  
Choose only one Debtor for each Proof of Claim form.

<b>Debtor</b>	<b>Case Number</b>
Quicksilver Resources Inc.	15-10585
Barnett Shale Operating LLC	15-10586
Cowtown Drilling, Inc.	15-10587
Cowtown Gas Processing L.P.	15-10588
Cowtown Pipeline Funding, Inc.	15-10589
Cowtown Pipeline L.P.	15-10590
Cowtown Pipeline Management, Inc.	15-10591
Makarios Resources International Holdings LLC	15-10592
Makarios Resources International Inc.	15-10593
QPP Holdings LLC	15-10594
QPP Parent LLC	15-10595
Quicksilver Production Partners GP LLC	15-10596
Quicksilver Production Partners LP	15-10597
Silver Stream Pipeline Company LLC	15-10598

**Schedule 1**

<b>Section/Field</b>	<b>Original B10</b>	<b>Modified B10</b>
Top Left Legend	B10 (Official Form 10) (04/13)	Modified B10 (GCG) (4/13)
Bankruptcy Court Designation	<i>Drop-down menu for user to select appropriate venue</i>	“FOR THE DISTRICT OF DELAWARE”
Name of Debtor	“Name of Debtor” field	<i>List of Debtors with check boxes and instruction to “Select Only One” and “Select Debtor from Attachment A (List of Debtors) to complete this section.”</i>
Claim Amount	<i>Provides directions for user to complete items 4 and/or 5 only</i>	<i>Provides directions for user to complete items 4 and/or 5 and “If all or part of the claim arises from the value of any goods received by the Debtor within 20 days before March 17, 2015, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor’s business, pursuant to 11 U.S.C. § 503(b)(9), complete item 6.”</i>
Claim Pursuant to 11 U.S.C. § 503(b)(9)	<i>Not included</i>	Item 6 – “Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before March 17, 2015, the date of commencement of the above cases, in which the goods have been sold to the Debtor in the ordinary course of such Debtor’s business.”  “Attach documentation supporting such claim. \$ _____”
Documents	“DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.”	“IF SUBMITTING HARD COPIES OF DOCUMENTS, DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.”

Section/Field	Original B10	Modified B10
<p>Proof of Claim Form Instructions</p>	<p>“The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, exceptions to these general rules may apply.”</p>	<p>“The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the Debtor, exceptions to these general rules may apply.”</p> <p>“The attorneys for the Debtors and their court-appointed claims agent, Garden City Group, LLC (“GCG”), are not authorized and are not providing you with any legal advice.”</p> <p><i>Provides addresses for submitting a hard copy of a proof of claim form by mail and hand or overnight courier.</i></p> <p>“ANY PROOF OF CLAIM SUBMITTED BY FACSIMILE OR EMAIL WILL NOT BE ACCEPTED. IF YOU HAVE SUBMITTED THIS PROOF OF CLAIM FORM ELECTRONICALLY, YOU DO NOT NEED TO SUBMIT THIS FORM. PLEASE RETAIN A COPY FOR YOUR RECORDS.”</p> <p><i>Lists the bar date in these chapter 11 cases.</i></p>



**Exhibit C**

**Proposed Bar Date Notice**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
Quicksilver Resources Inc., <u>et al.</u> , <sup>1</sup>	)	Case No. 15-10585 (LSS)
	)	
Debtors.	)	Jointly Administered
	)	

**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM**

**TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST ANY OF THE DEBTORS LISTED BELOW:**

DEBTOR	CASE NO.
Quicksilver Resources, Inc.	15-10585
Barnett Shale Operating LLC	15-10586
Cowtown Drilling, Inc.	15-10587
Cowtown Gas Processing L.P.	15-10588
Cowtown Pipeline Funding, Inc.	15-10589
Cowtown Pipeline L.P.	15-10590
Cowtown Pipeline Management, Inc.	15-10591
Makarios Resources International Holdings LLC	15-10592
Makarios Resources International Inc.	15-10593
QPP Holdings LLC	15-10594
QPP Parent LLC	15-10595
Quicksilver Production Partners GP LLC	15-10596
Quicksilver Production Partners LP	15-10597
Silver Stream Pipeline Company LLC	15-10598

---

<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: Quicksilver Resources Inc. [6163]; Barnett Shale Operating LLC [0257]; Cowtown Drilling, Inc. [8899]; Cowtown Gas Processing L.P. [1404]; Cowtown Pipeline Funding, Inc. [9774]; Cowtown Pipeline L.P. [9769]; Cowtown Pipeline Management, Inc. [9771]; Makarios Resources International Holdings LLC [1765]; Makarios Resources International Inc. [7612]; QPP Holdings LLC [0057]; QPP Parent LLC [8748]; Quicksilver Production Partners GP LLC [2701]; Quicksilver Production Partners LP [9129]; and Silver Stream Pipeline Company LLC [9384]. The Debtors’ address is 801 Cherry Street, Suite 3700, Unit 19, Fort Worth, Texas 76102.

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

On March 17, 2015 (the "Petition Date"), the debtors listed in the table above (each a "Debtor", and collectively, the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

On        **2015**, the Bankruptcy Court entered an order (the "Bar Date Order") establishing **July 31, 2015 at 5:00 p.m. prevailing Eastern Time** as the deadline for each entity (as defined in Bankruptcy Code section 101(15)), other than governmental units, to file proofs of claim against the Debtors (the "General Bar Date"), and **September 14, 2015 at 5:00 p.m. prevailing Eastern Time** as the deadline for governmental units to file proofs of claim against the Debtors (the "Government Bar Date" and, together with the General Bar Date, the "Bar Dates").

The Bar Dates and the procedures set forth below for the filing of proofs of claim apply to all claims against the Debtors that arose on or prior to the Petition Date other than those specifically excluded below.

**1. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a proof of claim to vote on a chapter 11 plan filed by the Debtors and to share in distributions from the Debtors' bankruptcy estates if you hold a claim that arose on or before the Petition Date, including any claim under Bankruptcy Code section 503(b)(9), unless you are excused from filing a proof of claim pursuant to an exception specifically identified in Section 2 below.

Under Bankruptcy Code section 101(5) and as used herein, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HOLD A CLAIM AGAINST THE DEBTORS OR THAT THE DEBTORS OR THE BANKRUPTCY COURT BELIEVE THAT YOU HOLD A CLAIM AGAINST THE DEBTORS.**

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HOLD A CLAIM AGAINST THE DEBTORS.**

**2. WHO DOES NOT NEED TO FILE A PROOF OF CLAIM**

You do **not** need to file a proof of claim with respect to the particular claim described below in this section 2 if:

- a. you have already properly filed, with the Clerk of the Bankruptcy Court or the Debtors' claim agent, GCG, a proof of claim against all Debtors against which you have a claim, in a form that substantially conforms to the Proof of Claim Form tailored for these chapter 11 cases or Official Form 10;
- b. your claim is listed on the Debtors' schedules of liabilities, provided that (i) such claim is not described as disputed, contingent, or unliquidated, (ii) you do **not** dispute the amount, nature, or priority of the claim as set forth in the Debtors' schedules of liabilities, and (iii) you do **not** dispute that such claim is an obligation of the specific Debtor as set forth in the Debtors' schedules of liabilities;
- c. you hold a claim that is limited exclusively to the repayment of principal, interest and/or other applicable fees and charges (a "Debt Claim") owed under any bond or note issued by the Debtors pursuant to an indenture (a "Debt Instrument"); *provided, however*, that: (i) other than as set forth in subparagraph d., below, an indenture trustee under a Debt Instrument (the "Indenture Trustee") must file one Proof of Claim, on or before the General Bar Date, with respect to all of the amounts owed under each of the Debt Instruments and such Proof of Claim shall be deemed to be asserted by the Indenture Trustee against every Debtor that is liable for the Debt Claim, without the necessity of filing separate Proofs of Claim against each Debtor, without the necessity of filing separate Proofs of Claim against each Debtor, so long as the Proof of Claim sets forth in reasonable detail the basis and amount of the claim asserted against each Debtor, and (ii) any holder of a Debt Claim wishing to assert a claim, other than a Debt Claim, arising out of or relating to a Debt Instrument must file a Proof of Claim on or before the General Bar Date, unless another exception in this paragraph applies;
- d. you hold a claim that has already been allowed by an order of the Bankruptcy Court entered on or before the applicable Bar Date, including, but not limited to the following, which have been deemed a timely filed proof of claim under the *Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Code rule 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral, and (II) Granting Adequate Protections to Prepetition Secured Parties* [D.I. 307]:
  - (1) The administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended, supplemented or otherwise modified, the "U.S. Credit Agreement");
  - (2) the administrative agent, lenders, issuing bank(s), secured swap providers and bank products providers under the Amended and Restated Credit Agreement, dated as of December 22, 2011 (as amended and supplemented or otherwise modified, the "Canadian Credit Agreement");
  - (3) the administrative agent and lenders under the Second Lien Credit Agreement, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the "Second Lien Credit Agreement"); and

- (4) the indenture trustee and holders of notes issued under the Indenture, dated as of June 21, 2013 (as amended, supplemented or otherwise modified, the “Second Lien Indenture”).
- e. your claim has already been paid in full by any of the Debtors or any other party;
  - f. you are a direct or indirect non-Debtor subsidiary of the Debtors;
  - g. you are a Debtor in these chapter 11 cases holding a claim against another Debtor;
  - h. you hold a claim allowable under Bankruptcy Code sections 503(b) and 507(a)(2) as an administrative expense (other than any claim allowable under section 503(b)(9) of the Bankruptcy Code, which, despite its priority status, is a pre-petition claim and subject to the General Bar Date as set forth above to the extent that such claim has not been paid);
  - i. you hold an interest in any of the Debtors, which interest is based exclusively upon the ownership of common stock, preferred stock, membership interests, partnership interests, or rights to purchase, sell, or subscribe to such an interest; *provided, however*, that if you wish to assert claims (as opposed to ownership interests) against any of the Debtors that arise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issuance, or distribution of the interest, you must file proofs of claim on or before the applicable Bar Date unless another exception identified herein applies; or
  - j. you are a current officer or director of the Debtors asserting claims for indemnification and/or contribution arising as a result of such officers’ or directors’ pre-petition or post-petition services to the Debtors;
  - k. you are an employee whose claim was previously authorized by order of the Bankruptcy Court to be satisfied by the Debtors in the ordinary course of business as a wage or benefit; *provided, however*, that you must submit a proof of claim by the General Bar Date if you dispute the amount of your previously authorized claim or if your claim relates to damages arising from claims for wrongful termination, discrimination, or workers’ compensation insurance.

### **3. REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

The Bankruptcy Code provides that the Debtors may, at any time before a chapter 11 plan is confirmed by the Bankruptcy Court, choose to reject certain executory contracts or unexpired leases. If your contract or lease is rejected, you may have a claim resulting from that rejection. The deadline to file a proof of claim for damages arising from the rejection of the contract or lease is the later of either (i) the General Bar Date or (ii) a date provided in an order of the Bankruptcy Court authorizing the rejection of the respective executory contract or unexpired lease, or if no date is provided, thirty (30) days after entry of the order authorizing such rejection.

#### 4. INSTRUCTIONS FOR FILING A PROOF OF CLAIM

To file a proof of claim, you must submit your claim either (i) electronically, so as to be **actually received** by GCG on or before the applicable Bar Date, by utilizing the Online Portal that can be accessed at GCG's website: <http://www.gardencitygroup.com/cases/kwk> or (ii) by delivering the **original** proof of claim in person, by courier service, by hand delivery, or by mail so as to be **actually received** by GCG on or before the applicable Bar Date at the following address:

**If sent via first class mail:**

Quicksilver Resources Inc., *et al.*  
c/o GCG  
P.O. Box 10155  
Dublin, OH 43017-3155

**If sent via hand delivery or overnight mail:**

Quicksilver Resources Inc., *et al.*  
c/o GCG  
5151 Blazer Parkway, Suite A  
Dublin, OH 43017

Do not send your proof of claim to the Debtors or to the Debtors' legal or financial advisors.

If you file a proof of claim, your filed proof of claim must (i) be written in the English language, (ii) be denominated in U.S. Dollars, (iii) be executed by the individual to whom service of any papers relating to such claim shall be directed, and (iv) conform substantially with the Proof of Claim Form or Official Form 10. If a paper Proof of Claim Form is not enclosed with this Notice, you may obtain a Proof of Claim Form by contacting the Debtors' claims agent, in writing, at Quicksilver Resources Inc., *et al.* c/o GCG, P.O. Box 10155, Dublin, OH 43017-3155 or by contacting the Debtors' restructuring hotline at (877) 940-2410.

Each proof of claim must include supporting documentation (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available; *provided, however*, that a proof of claim may be filed without supporting documentation upon the prior written consent of the Debtors; *provided further*, that any creditor that received such written consent shall be required to transmit such documentation to the Debtors upon request no later than seven (7) days from the date of such request.

**YOU MUST SPECIFICALLY IDENTIFY THE DEBTOR AGAINST WHICH YOU ASSERT A CLAIM BY NAME AND PROPER CHAPTER 11 CASE NUMBER. YOU SHOULD INCLUDE ALL CLAIMS AGAINST A PARTICULAR DEBTOR IN A SINGLE PROOF OF CLAIM FORM. IF YOU ASSERT A CLAIM AGAINST MORE THAN ONE DEBTOR, YOU MUST FILE A SEPARATE PROOF OF CLAIM FORM AGAINST EACH DEBTOR.**

**ANY CREDITOR OR INTEREST HOLDER THAT ELECTRONICALLY FILES A PROOF OF CLAIM OR INTEREST SHALL RETAIN SUCH PROOF OF CLAIM OR INTEREST (AND SUPPORTING DOCUMENTS) WITH AN ORIGINAL SIGNATURE FOR A PERIOD OF NOT LESS THAN TWO (2) YEARS FROM THE DATE THE PROOF OF CLAIM OR INTEREST IS ELECTRONICALLY FILED.**

**Except as expressly permitted in the context of electronic submission via the Online Portal, proofs of claim sent by facsimile, telecopy, or e-mail, or other form of electronic submission will not be accepted.**

**5. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM ON OR BEFORE THE APPLICABLE BAR DATE**

**ANY HOLDER OF A CLAIM AGAINST ANY OF THE DEBTORS THAT IS NOT EXCEPTED FROM THE REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH HEREIN, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN ACCORDANCE WITH THE TERMS OF THE BAR DATE ORDER ON OR BEFORE THE APPLICABLE BAR DATE SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION.**

**6. THE DEBTORS' SCHEDULES AND ACCESS THERETO**

You may be listed as the holder of a claim against the Debtors in the Debtors' schedules of liabilities. To determine if and how you are listed in the Debtors' schedules of liabilities, please refer to the descriptions set forth on the enclosed Cover Letter(s) or Proof of Claim Form(s) or on GCG's website at: [www.gardencitygroup.com/cases/kwk](http://www.gardencitygroup.com/cases/kwk) regarding the nature, amount, and status of your claim(s). If the Debtors believe that you may hold claims against more than one Debtor, you may receive multiple Cover Letters or Proof of Claim Forms, each of which will reflect the nature and amount of your claim against one Debtor, as listed on the Debtors' schedules of liabilities.

Copies of the Debtors' schedules of liabilities may be examined by interested parties free of charge online at GCG's website at: [www.gardencitygroup.com/cases/kwk](http://www.gardencitygroup.com/cases/kwk), and for a fee on the Bankruptcy Court's electronic docket for the Debtors' chapter 11 cases, which is available at [www.pacer.gov](http://www.pacer.gov) (a login identification and password are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>). Copies of the Debtors' schedules of liabilities may also be examined during regular business hours at the Office of the Clerk of the Bankruptcy Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware, 19801.

If you rely on the Debtors' schedules of liabilities, it is your responsibility to determine that the claim is accurately listed in such schedules. As set forth above, if you agree with the nature, amount, and status of your claim as listed in the Debtors' schedules of liabilities, and if you do not dispute that your claim is only against the Debtor specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need not file a proof of such claim. Otherwise, or if you decide to file a proof of claim, you must do so on or before the applicable Bar Date in accordance with the procedures set forth in this Notice.

If the Debtors amend or supplement their schedules of liabilities after you receive this Notice, the Debtors will give notice of such amendment or supplement to the holders of the claims that are affected thereby, and if such holders do not agree with such amendment or supplement, those holders will be required to file a proof of claim on the later of (i) the applicable Bar Date or (ii) thirty (30) days after the date on which the Debtors provided notice of such amendment or supplement.

## **7. ADDITIONAL INFORMATION**

This notice is only a summary of the Bar Date Order. All creditors and other parties in interest are referred to the text of the Bar Date Order itself and to the Bankruptcy Code, Bankruptcy Rules, and Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware for additional information regarding the filing and treatment of proofs of claim and should consult with their own legal advisors regarding any matters not covered by this Notice, such as whether such creditor should file a proof of claim.

Proof of Claim Forms and a copy of the Bar Date Order may be obtained by (i) contacting the Debtors' claims agent, in writing, at Quicksilver Resources Inc., et al. c/o GCG, P.O. Box 10155, Dublin, OH 43017-3155, (ii) contacting the Debtors' restructuring hotline at (877) 940-2410, (iii) emailing the Debtors' claims agent at [KWKinfo@gcginc.com](mailto:KWKinfo@gcginc.com), or (iv) accessing the website of the Debtors' claims agent at [www.gardencitygroup.com/cases/kwk](http://www.gardencitygroup.com/cases/kwk).



**Exhibit D-1**

**Cover Letter for Scheduled Creditors**



[Bar Code]

NAME ADDRESS 1  
NAME ADDRESS 2  
NAME ADDRESS 3  
NAME ADDRESS 4  
NAME ADDRESS 5  
CITY, STATE ZIP5- ZIP4

In re: Quicksilver Resources Inc., *et al.*  
Case No. 15-10585 (LSS)

To Whom It May Concern:

Enclosed please find a Notice of Deadline for Filing Proofs of Claim (the "Bar Date Notice") in the above referenced matter.

Please refer to the Bar Date Notice for complete instructions for filing a proof of claim. You have a claim scheduled by one of the Debtors as specified below.

Debtor:	Quicksilver Resources Inc.
Amount:	\$100.00
Classification:	Unsecured

Your Claim has been listed in the Debtor's schedules as:  
CONTINGENT  
UNLIQUIDATED

If you file a proof of claim in these chapter 11 cases, you are encouraged to use the online claims portal by visiting <http://www.gardencitygroup.com/cases/kwk> and entering the Claimant Number and Control number provided below:

Claimant Number:	100000008
Control Number:	0921209884

You may also download a hardcopy proof of claim at <http://www.gardencitygroup.com/cases/kwk> or by contacting the Garden City Group, LLC via email at [KWKInfo@gcginc.com](mailto:KWKInfo@gcginc.com), via phone at (877) 940-2410, or via mail at P.O. Box 10155, Dublin, OH 43017-3155.

Thank you,  
Garden City Group, LLC

**Exhibit D-2**

**Cover Letter for Unscheduled Parties**



[Bar Code]

NAME ADDRESS 1  
NAME ADDRESS 2  
NAME ADDRESS 3  
NAME ADDRESS 4  
NAME ADDRESS 5  
CITY, STATE ZIP5- ZIP4

In re: Quicksilver Resources Inc., *et al.*  
Case No. 15-10585 (LSS)

To Whom It May Concern:

Enclosed please find a Notice of Deadline for Filing Proofs of Claim (the "Bar Date Notice") in the above referenced matter.

Please refer to the Bar Date Notice for complete instructions for filing a proof of claim. If you file a proof of claim in these chapter 11 cases, you are encouraged to use the online claims portal by visiting <http://www.gardencitygroup.com/cases/kwk> and entering the Claimant Number and Control number provided below:

Claimant Number:	100000008
Control Number:	0921209884

You may also download a hardcopy proof of claim at <http://www.gardencitygroup.com/cases/kwk> or by contacting the Garden City Group, LLC via email at [KWKInfo@gcginc.com](mailto:KWKInfo@gcginc.com), via phone at (877) 940-2410, or via mail at P.O. Box 10155, Dublin, OH 43017-3155.

Thank you,  
Garden City Group, LLC

**Exhibit D-3**

**Cover Letter for Beneficial Holders of Securities**



To All Holders of Securities

In re: Quicksilver Resources Inc., *et al.*  
Case No. 15-10585 (LSS)

To Whom It May Concern:

Enclosed please find a Notice of Deadline for Filing Proofs of Claim (the "Bar Date Notice") in the above referenced matter.

Please refer to the Bar Date Notice for complete instructions for filing a proof of claim. If you file a proof of claim in these chapter 11 cases, you are encouraged to use the online claims portal by visiting <http://www.gardencitygroup.com/cases/kwk> and following the instructions on the website.

You may also download a hardcopy proof of claim at <http://www.gardencitygroup.com/cases/kwk> or by contacting the Garden City Group, LLC via email at [KWKInfo@gcginc.com](mailto:KWKInfo@gcginc.com), via phone at (877) 940-2410, or via mail at P.O. Box 10155, Dublin, OH 43017-3155.

**You do not need to file a proof of claim if you hold an interest in any of the Debtors in these chapter 11 cases, which interest is based exclusively upon the ownership of common stock, preferred stock, membership interests, partnership interests, or rights to purchase, sell, or subscribe to such an interest; *provided, however,* that if you wish to assert claims (as opposed to ownership interests) against any of the Debtors that arise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issuance, or distribution of the interest, you must file proofs of claim on or before the applicable Bar Date unless another exception identified in the Bar Date Notice applies.**

**You also do not need to file a proof of claim if you hold a claim that is limited exclusively to the repayment of principal, interest and/or other applicable fees and charges (a "Debt Claim") owed under any bond or note issued by the Debtors pursuant to an indenture (a "Debt Instrument"); *provided, however,* that: (i) other than as set forth in paragraph 2(d) of the Bar Date Notice, an indenture trustee under a Debt Instrument (the "Indenture Trustee") must file one proof of claim, on or before the General Bar Date (as defined in the Bar Date Notice), with respect to all of the amounts owed under each of the Debt Instruments and (ii) any holder of a Debt Claim wishing to assert a claim, other than a Debt Claim, arising out of or relating to a Debt Instrument must file a proof of claim on or before the General Bar Date, unless another exception in the Bar Date Notice applies.**

Thank you,  
Garden City Group, LLC

**Exhibit D-4**

**Cover Letter for Parties Receiving a Paper Proof of Claim Form**



[Bar Code]

NAME ADDRESS 1  
NAME ADDRESS 2  
NAME ADDRESS 3  
NAME ADDRESS 4  
NAME ADDRESS 5  
CITY, STATE ZIP5- ZIP4

In re: Quicksilver Resources Inc., *et al.* ("Quicksilver")  
Case No. 15-10585 (LSS)

To Whom It May Concern:

You are receiving this letter because you are either currently doing business with Quicksilver, or have in the past done business with Quicksilver. Your business relationship with Quicksilver may relate to land where Quicksilver currently owns, or has in the past owned, mineral interests. Quicksilver has Bankruptcy Court authority to continue paying royalties, overriding royalties, non-executive mineral interests, and non-participating royalty interests in the ordinary course of business. As a result, Quicksilver believes that it either has paid or will pay all such amounts due and owing. Further, Quicksilver believes that it does not owe you any amounts on account of such obligations. Nevertheless, Quicksilver is providing you with information to file a claim in Quicksilver's bankruptcy cases in the event that you believe Quicksilver owes you money.

Enclosed please find a Notice of Deadline for Filing Proofs of Claim (the "Bar Date Notice") in the above referenced matter as well as a hard-copy, paper proof of claim form. Please refer to the Bar Date Notice for complete instructions for filing a proof of claim. If you file a proof of claim in these chapter 11 cases, you are encouraged to use the online claims portal by visiting <http://www.gardencitygroup.com/cases/kwk> and entering the Claimant Number and Control number provided below:

Claimant Number:	100000008
Control Number:	0921209884

You may also download a hardcopy proof of claim at <http://www.gardencitygroup.com/cases/kwk> or by contacting the Garden City Group, LLC via email at [KWKInfo@gcginc.com](mailto:KWKInfo@gcginc.com), via phone at (877) 940-2410, or via mail at P.O. Box 10155, Dublin, OH 43017-3155. Upon completion, all hardcopy Proof of Claim forms must be mailed as follows, so as to be received on or before the aforementioned applicable bar date:

**If sent via first class mail:**  
Quicksilver Resources Inc., *et al.*  
c/o GCG  
P.O. Box 10155  
Dublin, OH 43017-3155

**If sent via hand delivery or overnight mail:**  
Quicksilver Resources Inc., *et al.*  
c/o GCG  
5151 Blazer Parkway, Suite A  
Dublin, OH 43017

Thank you,  
Garden City Group, LLC