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*M-2025-3052793*  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

KTRV LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10601 (MFW)  
(Jointly Administered)

Hearing Date: April 17, 2025 at 3:00 p.m. (ET)  
Obj. Deadline: April 10, 2025 at 4:00 p.m. (ET)

Re: Docket Nos. 6, 7, 8, 9, 20, 11, 12, 14, 51, 52,  
53, 54, 55, 56, 57, 58

**OMNIBUS NOTICE OF FIRST DAY MOTIONS AND FINAL HEARING THEREON**

PLEASE TAKE NOTICE that on March 30, 2025, the above captioned debtors and debtors-in-possession (the “Debtors”) filed, among others, the following applications and motions set forth below (collectively, the “First Day Motions”) with the Clerk of the United States Bankruptcy Court for the District of Delaware (the “Court”).

1. Debtors’ Motion Pursuant to Sections 105 and 366 of the Bankruptcy Code for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services To, Or Discriminating Against, the Debtors, (II) Determining That the Utility Companies are Adequately Assured of Postpetition Payment and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance [Filed March 30, 2025; Docket No. 6];
2. Debtors’ Motion for Entry of Interim and Final Orders Authorizing (I) Maintenance of Existing Bank Accounts, (II) Suspending the Requirements of Section 345(b); (III) Continued Use of Existing Cash Management System; (IV) Continued Use of Business Forms; and (V) Granting Related Relief [Filed March 30, 2025; Docket No. 7];
3. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay or Honor Prepetition Claims of Critical Vendors; (II) Authorizing and Directing Finance Institutions to Honor All Related Checks and Electronic Payment Requests; and (III) Granting Related Relief [Filed March 30, 2025; Docket No. 8];
4. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of Shippers and Other Lien Claimants; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [Filed March 30, 2025; Docket No. 9];

<sup>1</sup> The Debtors in these chapter 11 cases, along with each the last four digits of each Debtor’s tax identification number, are as follows: KTRV LLC (9993), Heritage Coal & Natural Resources, LLC (8326). The Debtors’ service address is 1521 Concord Pike, Suite 201, Wilmington, DE 19803.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees; (II) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests; and (III) Granting Related Relief [Filed March 30, 2025; Docket No. 10];
6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations, and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed March 30, 2025; Docket No. 11];
7. Debtors' Motion for Interim and Final Orders Authorizing But Not Directing Debtors to (I) Pay Certain Prepetition Obligations Arising Under Their Insurance Policies and Surety Bonds, and (II) for Related Relief [Filed March 30, 2025; Docket No. 12]; and
8. Debtors' Motion for Entry of Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed March 30, 2025; Docket No. 14].

**PLEASE TAKE FURTHER NOTICE** that a hearing on the First Day Motions was held on April 1, 2025, at which time the Court approved the First Day Motions identified above on an interim basis. *See* Docket Nos. 51, 52, 53, 54, 55, 56, 57, 58.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider final approval of the First Day Motions is scheduled for **April 17, 2025 at 3:00 p.m. (ET) (the "Second Day Hearing")** at the United States Bankruptcy Court for the District of Delaware before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that in addition to the undersigned proposed counsel for the Debtors, any objection to the entry of a final order approving the First Day Motions must also be served on or before **April 10, 2025 at 4:00 p.m. (ET) (the "Second Day Objection Deadline")** upon: (a) the Debtors, 1521 Concord Pike, Suite 201, Wilmington, DE 19803, Attn: Brian Ryniker; and (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Malcolm M. Bates, malcolm.m.bates@usdoj.gov (collectively, the "Notice Parties").

As these Motions seek first-day relief, notice of these Motion and any order entered hereon will be served on all parties required by Rule 9013-1(m) of the Local Rules for the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions can be obtained for a fee through the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), referencing Case No. 25-10601 (MFW). Copies of First Day Motions are also available for free from the website of the Debtor's noticing agent at <https://cases.stretto.com/KTRV>.

**IF NO OBJECTIONS TO ANY OF THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 5, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman

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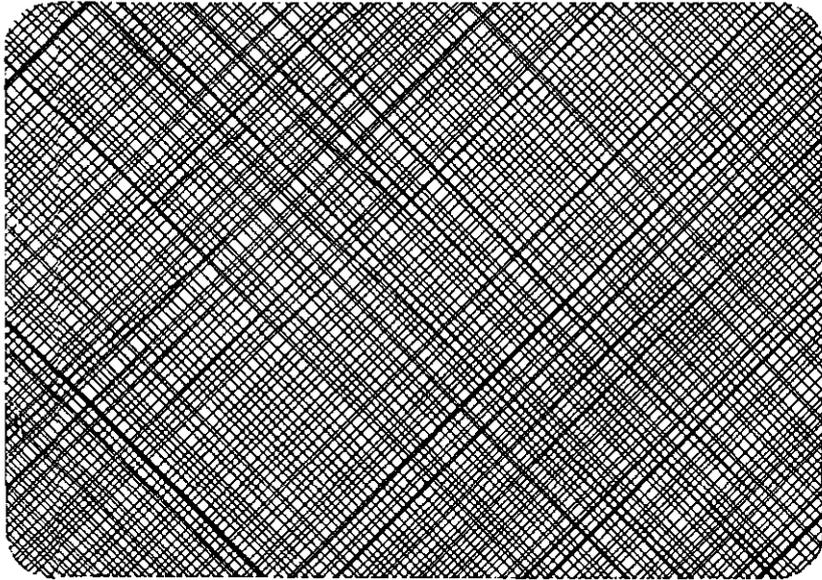


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