

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN THE MATTER OF: )  
 ) CASE NO. 13-40813  
D & L ENERGY, INC., *et al.* )  
 ) CHAPTER 11  
 )  
Debtors and Debtors-in-Possession )  
 ) JUDGE KAY WOODS  
 )  
DEBTOR )

**MOTION FOR AN ORDER ADJOURNING HEARING SET FOR APRIL 22, 2014  
REGARDING DEBTORS' MOTION FOR AN ORDER: DETERMINING CERTAIN  
ADDITIONAL OHIO OIL AND GAS LEASES DO NOT CONSTITUTE EXECUTORY  
CONTRACTS OR UNEXPIRED LEASES SUBJECT TO 11 U.S.C. §365; OR  
ALTERNATIVELY ALLOWING DEBTORS TO ASSUME CERTAIN ADDITIONAL  
OHIO OIL AND GAS LEASES AS EXECUTORY CONTRACTS AND/OR UNEXPIRED  
LEASES (DOCKET ENTRY 667) AND MERRILL AND OPAL MONEY'S OBJECTION  
TO THE SAME (DOCKET ENTRY 675)**

Now comes D&L Energy, Inc. ("D&L") and Petroflow, Inc. ("Petroflow"), debtors and debtors in possession herein (collectively the "Debtor") by and through counsel, and hereby respectfully moves the Court for an order adjourning the hearing regarding *Debtors' Motion For An Order: Determining Certain Additional Ohio Oil & Gas Leases Do Not Constitute Executory Contracts Or Unexpired Leases Subject To 11 U.S.C. Section 365; Or Alternatively Allowing Debtors To Assume And Assign Certain Additional Ohio Oil & Gas Leases As Executory Contracts And/Or Unexpired Leases*, Docket Entry 667, filed on March 31, 2014 (the "Additional Leases Motion") and the Money's *Objection*, docket entry number 675, filed on April 15, 2014 (the "Money Objection"), which is currently set for April 22, 2014, until June 9, 2014.

In support of this Motion, Debtor respectfully represents that although it has only

preliminarily engaged in discussions with counsel for the Moneys regarding the Money Objection, it intends to engage in more robust talks in the very near future and believes that a resolution of said Objection is likely. Additionally, opposing counsel has already filed a motion for continuance of this matter. Debtor obviously does not oppose this request and would ask that the Money Objection be adjourned until June 9, 2014.

Aside from the Money Objection, there were no other objections/responses filed with respect to the Additional Leases Motion. Despite the lack of other objections to the Additional Leases Motion, Debtor intends to engage in additional discussions with all of the interested parties whose leases are the subject of the Additional Leases Motion. Debtor believes that the additional time requested in this Motion will allow it to further engage the interested parties which may resolve any outstanding issues with respect to the relief requested in the Additional Leases Motion.

**WHEREFORE**, Debtor respectfully requests the Court enter an Order adjourning the hearing on the Additional Leases Motion and the Money Objection to June 9, 2014 at 9:30 a.m.

Respectfully submitted,

Roderick Linton Belfance LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of April 2014, a copy of the foregoing Motion was sent as follows:

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