

Charles R. Gibbs (Texas No. 07846300)
cgibbs@akingump.com
Eric C. Seitz (Texas No. 24067863)
eseitz@akingump.com
AKIN GUMP STRAUSS HAUER & FELD LLP
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343

Attorneys for Scott Y. Wood

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> ,	§	Jointly Administered
	§	
Reorganized Debtors. ¹	§	Case No. 15-31858-hdh-11
	§	

**JOINDER OF SCOTT Y. WOOD TO MOTION OF THE EXEMPT ASSETS TRUSTEE
TO EXPUNGE OR REDUCE SATISFIED CLAIMS FROM THE CLAIMS REGISTER**

Scott Y. Wood (“**Wood**”), a creditor and party-in-interest in the above-referenced bankruptcy cases, by and through his undersigned counsel, hereby files this *Joinder* (the “**Joinder**”) of Scott Y. Wood to Motion of the Exempt Assets Trustee to Expunge or Reduce Satisfied Claims from the Claims Register (the “**Motion**”).² Wood hereby joins the Motion.

WHEREFORE, based on the foregoing, Wood respectfully requests that the Court (a) enter an order (i) expunging or reducing, as applicable, the Satisfied Claims from the Claims

¹ The “**Debtors**” in these cases, along with the last four digits of each Debtor’s federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309.

² Capitalized terms not defined herein shall have the meaning given to them in the Motion.

Register and (ii) deeming amended any of the applicable Debtors' schedules and (b) grant such other relief as the Court may deem necessary and proper.

Dated: September 21, 2017

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Eric C. Seitz
Charles R. Gibbs (Texas Bar No. 07846300)
Eric C. Seitz (Texas Bar No. 24067863)
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343

Attorneys for Scott Y. Wood

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing was served by (i) electronic notice to all parties requesting such service under the ECF system and (ii) United States mail, postage prepaid, to all parties on the attached service list, on this 21st day of September 2017.

/s/ Eric C. Seitz
Eric C. Seitz

SERVICE LIST

Thomas M. Counihan
920 Jasmine Parke Dr., Apt. #1
Bakersfield, CA 93312

Mariella Edgar
553 Encino Vista Dr.
Thousand Oaks, CA 91362

Phillip E. Hosch
4627 Kenneth Ave.
Santa Maria, CA 93455

Patricia D. Orange
2228 South Real Rd., #101
Bakersfield, CA 93309

Three Allen Center Co., LLC
c/o Angela N. Offerman
919 Main, Ste. 2200
Houston, TX 77002

John M. Deacon
375 Silver Lane
Santa Maria, CA 93455

Ali Fakhreddine
4900 California Ave., Ste. 300B
Bakersfield, CA 93309

Lisa Toler
19623 Crossbranch Dr.
Houston, TX 77094

Texas General Land Office
PO Box 12873, Mail Code 222
Austin, TX 78711

Michelle Adams Layton
4900 California Ave., Ste. 300B
Bakersfield, CA 93309

Berry Walker
4900 California Ave., Ste. 300B
Bakersfield, CA 93309

Three Allen Center Co., LLC
c/o Angela N. Offerman
919 Milam, Ste. 2200
Houston, TX 77002

Ben Oakley
4900 California Ave., Ste. 300B
Bakersfield, CA 93309

H C Distribution
49-950 Jefferson St.,
Ste. 130#298
Indio, CA 92201

Denny Dobson
4900 California Ave., Ste. 300B
Bakersfield, CA 93309