

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: GAVILAN RESOURCES, LLC, <i>et al.</i>¹ DEBTORS.	§ § § § §	Chapter 11 CASE NO. 20-32656 (DRJ) (Jointly Administered)
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**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE
COMBINED WITH REQUEST FOR ALL COPIES PURSUANT
TO BANKRUPTCY RULE 2002(a) AND PLEADINGS
PURSUANT TO BANKRUPTCY RULES 3017(a) AND 9007**

Aparicion Minerals, LP by APA Management, LLC (General Partner), Diana M. Stumberg, EBS Mineral Holdings, Ltd. by Kerickson Management LLC (General Partner), Jefferson Bank, Trustee of the Fitzsimons Oil and Gas Management Trust, Argent Trust Company, Trustee of the Hugh A. Fitzsimons, Jr. Trust, Hugh A. Fitzsimons, III, Trustee of the Hugh A. Fitzsimons, III, Trust, H. A. Fitzsimons, III, Trustee of the Evelyn Bailey Fitzsimons Trust of 2008, Hugh A. Fitzsimons, IV, Trustee of the Hugh Asa Fitzsimons, IV, Trust of 2008, H. A. Fitzsimons, III, Trustee of the Patrick Carrigan Fitzsimons Trust of 2008, Joseph B. C. Fitzsimons, Trustee of the Joseph B. C. Fitzsimons Trust, Joseph B.C. Fitzsimons and Fay Carrigan Fitzsimons, as Co-Trustees of the Fay Carrigan Fitzsimons Trust of 2008, Joseph B. C. Fitzsimons, Trustee of the Jonathan Calvert Fitzsimons Trust of 2008, Joseph B. C. Fitzsimons, Trustee of the Katherine Burgwin Fitzsimons Trust of 2008, Pamela Fitzsimons Howard, Trustee of the Pamela Carrigan Fitzsimon Howard Trust, Pamela Fitzsimons Howard and Anson Boulware Howard as

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Gavilan Resources, LLC (6688); Gavilan Resources HoldCo, LLC (6425); Gavilan Resources Holdings, LLC (4496); and Gavilan Resources Management Services, LLC (3961). The Debtors' mailing address is 920 Memorial City Way, Suite 1400, Houston, Texas 77024.

Co-Trustees of the Anson Boulware Howard Trust of 2008, Pamela Carrigan Fitzsimons Howard and Laura Isabel Howard, Co-Trustees of the Laura Isabel Howard Trust of 2008, Pamela Fitzsimons Howard, Trustee of the Louisa Carrigan Fitzsimons Howard Trust of 2008, Harry Schwethelm and Anson Boulware Howard, Co-Trustees of the Anson Boulware Howard 2009 Trust, Harry F. Schwethelm, Jr. and Laura Isabel Howard, Co-Trustees of the Laura Isabel Howard 2009 Trust, Harry F. Schwethelm, Jr., Trustee of the Louisa Carrigan Fitzsimons Howard 2009 Trust, Leo F. Perron, Jr. and Patricia Perron Bowen Co-Trustees of The Leo F. Perron Jr. Trust, Broadway National Bank, Successor Trustee of the Hugh Preston Perron Trust, Broadway National Bank, Successor Trustee of The Penelope Perron Shephard Trust, Broadway National Bank, Successor Trustee of The Seawillow Gay Perron Kelley Trust, Kathleen Love, Kathleen Fitzsimons Love, Trustee, of The J.B. Love Residuary Trust, Jackson Benjamin Love, Jr., Sylvia L. Adger Minerals, L.L.C., James G. Adger and Kyle A. Moore, Co-Trustees of The James G Adger Legacy Trust dated April 30, 2013, Courtenay Beinhorn Dunk, William Alston Beinhorn & The William A. Beinhorn, Jr. Family Limited Partnership, La Estancia Investments, LP by SFE Holdings, Inc. (General Partner), Rogers Dentonio Ranch, Ltd., Maund Family Limited Partnership by Maund Family GP, Inc. (General Partner), and South Spur, LP by South Spur Investments, LLC (collectively “**Royalty Owners**”) requests that all notices given or required to be given in this case and in any cases consolidated herewith, and all papers served or required to be served in this case be given to and served upon:

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This request encompasses all notices, copies, and pleadings referred to in Rules 2002, 3017, and 9007 of the Bankruptcy Rules of Procedure, including but not limited to notices of any orders, motions, demands, complaints, petitions, pleadings, requests, applications, and any other documents brought before this court in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telegram, telex, or otherwise, which affect or seek to affect this case.

Please take further notice that the foregoing request for notice and service of papers is not a submission by Royalty Owners to the jurisdiction of the Bankruptcy Court nor a waiver of its respective rights to: (a) receive service of process for any complaint or subpoena; (b) have final orders in non-core matters entered only after de novo review by a District Judge; (c) trial by jury in any proceedings so triable in these cases, controversies, or proceedings related to these cases; (d) have the District Court withdraw reference in any matter subject to mandatory or discretionary withdrawal; or (e) waive any other rights, claims, actions, defenses, setoffs, or recoupments to which Royalty Owners is, or may be entitled, in law or in equity, all of which are expressly reserved.

Respectfully submitted,

SPENCE, DESENBERG & LEE, PLLC

By: /s/ Ross Spence

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**ATTORNEYS FOR
APARICION MINERALS, LP, et al.**

CERTIFICATE OF SERVICE

I certify that on the 2nd day of October 2020, a true and correct copy of the above and foregoing was served upon all parties via the Court's electronic case filing system (ECF).

/s/ Ross Spence
Ross Spence