

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION**

In re:

Cambrian Holding Company, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-51200

(Jointly Administered)

**MOTION TO ALLOW GEOFFREY S. GOODMAN
TO APPEAR TELEPHONICALLY AT NOVEMBER 18, 2021 HEARING**

Ellen Arvin Kennedy, solely in her capacity as the Liquidating Trustee (the “**Liquidating Trustee**”) of the Cambrian Liquidating Trust (the “**Liquidating Trust**”), by and through its counsel, respectfully moves the Court (the “**Motion**”) for entry of an order permitting the Geoffrey S. Goodman (“**Mr. Goodman**”) to appear telephonically at the hearing scheduled for November 18, 2021 at 9:00 a.m. (the “**Hearing**”). In support of this Motion, the Liquidating Trustee respectfully states as follows:

1. The Hearing is currently scheduled for Thursday, November 18, 2021 at 9:00 a.m. to consider the *Motion of the Liquidating Trustee for a Status Conference Regarding Transfer of Permits and for Shortened Notice* [ECF No. 1875] (the “**Status Conference Motion**”). The Trustee respectfully requests that Mr. Goodman be allowed to appear telephonically at the Hearing on the Status Conference Motion.

¹ The “**Debtors**” in these chapter 11 cases are (with the last four digits of their federal tax identification numbers in parentheses): Cambrian Holding Company, Inc. (8203), Cambrian Coal LLC (3394), Apex Energy, Inc. (3455), C.W. Auguring, Inc. (2875), Marshall Resources, Inc. (9735), PLM Holding Company LLC (7427), Bear Branch Coal LLC (0674), Clintwood Elkhorn Mining LLC (6910), Gatliff Coal LLC (5768), Perry County Coal LLC (4382), Ray Coal LLC (0981), Whitaker Coal LLC (8270), Pike-Letcher Land LLC (8952), Premier Elkhorn Coal LLC (8951), Raven Rock Development LLC (1351), Rich Mountain Coal LLC (1974), S.T. & T. Leasing, Inc. (0340), T.C. Leasing, Inc. (7705), and Shelby Resources, LLC (5085).

2. The Trustee did not believe that the filing of the Status Conference Motion would be necessary until this week. Due to the timing of the filing of the Status Conference Motion, it would be burdensome for the estates for Mr. Goodman to schedule a flight on shortened notice. The Trustee believes that Mr. Goodman's remarks to the Court will be brief and can be effectively delivered via telephone.

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter an order (i) authorizing Mr. Goodman to appear telephonically at the Court's Hearing; and (ii) granting such other and further relief as the Court may deem just and proper.

NOTICE

Notice is hereby given that pursuant to KYEB LBR 9013-1(c), the Trustee requests that this Court grant this Motion without notice or opportunity for hearing. The Trustee submits that such relief is appropriate in this instance due to the nature of the relief requested and the short time between the filing of the Status Conference Motion and the Hearing.

Respectfully submitted,

By: /s/ Geoffrey S. Goodman
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CERTIFICATE OF SERVICE

This document has been electronically filed and served via the Court's ECF System on November 17, 2021

/s/ T. Kent Barber
COUNSEL FOR THE LIQUIDATING TRUSTEE