

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

In re:)	
)	Chapter 11
CHESAPEAKE ENERGY)	
CORPORATION, <i>et al.</i> ,)	Case No. 20-33233 (DRJ)
)	
Debtors.)	Jointly Administered

**PENNSYLVANIA MOVING PARTIES'¹ REQUEST THAT MOTIONS
BE GRANTED AS UNOPPOSED**

The Moving Parties hereby request that the Court enter the attached proposed orders granting their motions. In support of their request, the Pennsylvania Proof of Claim Lessors state as follows:

1. On March 29, 2021, the Pennsylvania Lessors filed a motion to compel arbitration or, in the alternative, for permissive abstention. ECF No. 3348.
2. On March 30, 2021, the Tyler/Mowry Movants filed a motion for permissive abstention. ECF No. 3359.
3. The hearing date on the Motions has been continued a number of times. The hearing is presently set for January 18, 2022.
4. The notice of the January 18, 2022 hearing, submitted by Debtors' counsel, is attached as Exhibit A.

¹ The Moving Parties are Tim & Terri Tyler Family LP; Tyler 5 FLP; Timothy & Terri Tyler; and Rodney & Dianna Mowry (the "Tyler/Mowry Movants") and William R. Ruark and WLR Family Partnership; Sally Steele, Esquire, Herbert D. Steele and Leola B. Steele; Raynold W. Wilson, Judith A. Wilson, R&J Partners, L.P. and Cemetery Road Hunt Club, Inc.; Placewood Resource Management, L.L.C., Placewood Resources, L.P., Richard E. Place, Charlotte E. Place, the Richard E. Place Trust, the Charlotte E. Place Trust and Jesse C. Place (the "Pennsylvania Lessors").

5. The Moving Parties granted one extension of time for Chesapeake to file a response to the Motions, and that deadline expired July 16, 2021. *See* May 29, 2021 email from A. Helfer to E. Clark, attached as Exhibit B.

6. Chesapeake never sought another extension of time to file a response to the Motions.

7. The Motions included a standard-form cautionary notice. That notice states:

IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.

8. Debtors failed to file opposition to the Motions. Moving Parties have reviewed the docket and have not located any opposition to the pending motions.

9. On January 14, 2022, Debtors submitted a witness and exhibit list, but Debtors' submission lists no witnesses or exhibits.

10. Debtors' witness and exhibit list does not state any reason why the Motions should not be granted.

WHEREFORE, Moving Parties respectfully request that the Court enter the proposed orders granting the Motions as unopposed.

Dated: January 14, 2022

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ Arleigh P. Helfer III

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