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*Proposed Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
AGERA ENERGY LLC, <i>et al.</i> , ¹)	Case No. 19-23802 (RDD)
)	
Debtors.)	(Jointly Administered)
_____)	

NOTICE OF SECOND DAY HEARING

PLEASE TAKE NOTICE that on October 4, 2019 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Second Day Hearing”) to consider final relief of the following first day motions and related pleadings (collectively, the “First Day Pleadings”) will take place on **November 5, 2019, at 10:00 a.m., prevailing Eastern Time**, with such hearing to be held before the Honorable Robert D. Drain, United States

¹ The Debtors, together with the last four digits of each Debtor’s federal tax identification number, are: Agera Energy LLC (8122); Agera Holdings, LLC (3335); energy.me midwest llc (9484); Aequitas Energy, Inc. (7988); Utility Recovery LLC (4351); and Agera Solutions LLC (8749). The location of the Debtors’ corporate headquarters and the service address for all Debtors is 555 Pleasantville Road, S-107, Briarcliff Manor, NY 10510.

Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601:

1. ***Prepetition Taxes Motion.*** Debtors' Motion for Entry of an Interim And Final Order (I) Authoring, but not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 7].
2. ***Wages Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Certain Prepetition Wages, Reimbursable Expenses, Benefits, and Related Items [Docket No. 8].
3. ***Cash Management Motion.*** Debtors' Motion For Entry Of Interim And Final Orders Authorizing Debtors To Continue (I) to Operate Their Cash Management System, Honor Certain Prepetition Obligations Related Thereto, and Maintain Existing Business Forms; and (II) Their Intercompany Transactions [Docket No. 9].
4. ***Motion to Pay Service Providers.*** Debtors' Motion For Entry of Interim and Final Orders Authorizing The Debtors to (I) Pay Certain Prepetition Claims of Service Providers and (II) Continue Satisfying Postpetition Obligations in the Ordinary Course of Business [Docket No. 12].
5. ***DIP Motion.*** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Authorizing Use of Cash Collateral; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying Automatic Stay; (VI) Scheduling Final Hearing; and (VII) Granting Related Relief [Docket No. 13].

PLEASE TAKE FURTHER NOTICE that, in addition to the First Day Pleadings, the Debtors have also filed certain motions and applications that will be heard at the Second Day Hearing (collectively, the "Second Day Pleadings"):

1. ***Insurance Motion.*** Debtors' Motion For Entry of an Order (I) Authorizing the Debtors to (A) pay their Obligations Under Prepetition Insurance Policies, (B) Continue to pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage in the Ordinary Course, and (D) Honor their Prepetition Insurance Premium Financing Agreements; (II) Authorizing Banks and other Financial Institutions to Honor Checks and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 14].

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Pleadings or Second Day Pleadings must comply with the Federal Rules of Bankruptcy Procedure, all General Orders applicable to chapter 11 cases in the Court, the Local Bankruptcy Rules for the Southern District of New York, and the *Order (A) Establishing Certain Notice, Case Management, and Administrative Procedures and (B) Granting Related Relief* (the “Case Management Procedures Order”). Objections, if any, to the DIP Motion shall be filed and served, with a copy to the Court’s Chambers, in a manner consistent with the Case Management Procedures Order, by **October 25, 2019 at 4:00 p.m., prevailing Eastern Time**. Objections, if any, to the remaining First Day Pleadings or Second Day Pleadings shall be filed and served, with a copy to the Court’s Chambers, in a manner consistent with the Case Management Procedures Order by **October 29, 2019 at 4:00 p.m., prevailing Eastern Time**.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and the Second Day Pleadings may be obtained free of charge by visiting the website of Stretto at <http://cases.stretto.com/agera>. You may also obtain copies of any pleadings by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that *your rights may be affected*. You should read the First Day Pleadings and Second Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings and Second Day Pleadings, or if you wish for the Court to consider your views on the First Day Pleadings and Second Day Pleadings, then you or

your attorney must attend the Second Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and Second Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings and Second Day Pleadings.

Dated: October 14, 2019
New York, New York

/s/ Darren Azman
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