

J. Michael Sutherland  
Michelle V. Larson  
**CARRINGTON, COLEMAN, SLOMAN  
& BLUMENTHAL, L.L.P.**  
901 Main Street, Suite 5500  
Dallas, TX 75202  
214-855-3000  
214-855-1333 – Fax

PROPOSED COUNSEL FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:** §  
§  
**KC7 RANCH, LTD, et al.,** § Case No. 17-45166-mxm  
§ Chapter 11  
§ (Joint Administered)  
**DEBTORS.** §

**CORRECTIVE SUPPLEMENT TO MOTION FOR ORDER APPROVING  
AGREED INTERIM ORDER (I) AUTHORIZING THE DEBTORS  
TO USE CASH COLLATERAL, (II) GRANTING ADEQUATE PROTECTION,  
AND (III) GRANTING RELATED RELIEF**

KC7 Ranch, Ltd and its above-captioned debtor affiliates (collectively, the “Debtors”), as debtors and debtors in possession, hereby file their *Corrective Supplement to Motion for Order Approving Agreed Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, and (III) Granting Related Relief*, (Doc. No. 56), and respectfully state as follows:

**CORRECTIVE SUPPLEMENT TO MOTION FOR ORDER APPROVING  
AGREED INTERIM ORDER (I) AUTHORIZING THE DEBTORS TO USE  
CASH COLLATERAL, (II) GRANTING ADEQUATE PROTECTION,  
AND (III) GRANTING RELATED RELIEF**

## I. RESTATEMENT AND ADOPTION

1. Except as supplemented and corrected below, the Debtors restate and adopt the previously filed *Motion for Order Approving (A) Agreed Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, and (III) Granting Related Relief, and (B) Authorizing Debtors to Pay a De Minimis Pre-Petition Utility Claim*, (Doc. No. 56, the “Motion”).

## II. CORRECTION AND SUPPLEMENT

2. The Debtors hereby substitute the attached updated and corrected Exhibit “A” in the place and instead of the prior Exhibit “A” attached to the Motion as originally filed.

3. Some of the previously listed items have been removed. In particular, a few items that were wholly pre-petition in nature were errantly included in the prior version of Exhibit “A.”

4. In a few instances, the amounts remaining in the revised Exhibit “A” have increased in immaterial amounts. The net effect is that the requested payment items in January and February 2018 in the prior Exhibit “A” totaled \$21,054.63, whereas the total in the new Exhibit “A” is \$21,967.23.

5. This correction and supplement does not alter the prior fn.1 wherein the payment of \$3,039.03 for the annual grazing lease payment to Texas Pacific Land Trust is suspended pending further agreement or Order.

6. Debtors request in the Motion for authority (final and not interim) to pay a single, pre-petition utility claim in a *de minimis* amount has been restated in a separate albeit interrelated motion (Doc. No. 58).

### III. NOTICE

7. No trustee, examiner, or statutory creditors' committee has been appointed in these Chapter 11 Cases. Notice of this Motion has been or will be provided to: (i) the Office of the United States Trustee for the Northern District of Texas; (ii) counsel to Hitachi; (iii) the 20 largest unsecured creditors of the Debtors' bankruptcy estates; (iv) the Internal Revenue Service; and (v) all parties in interest who have formally appeared and requested notice. The Debtors respectfully submit that no further notice of this Motion is required.

8. The pleadings in these Bankruptcy Cases and supporting papers are available on the Bankruptcy Court's website at <https://ecf.txnb.uscourts.gov/>. If you cannot access this website, you may request any pleading you need from counsel for the Debtors at:

Carrington, Coleman, Sloman & Blumenthal, L.L.P.  
c/o J. Michael Sutherland  
901 Main Street, Suite 5500  
Dallas, TX 75202  
([msutherland@ccsb.com](mailto:msutherland@ccsb.com))

### IV. CONCLUSION

**WHEREFORE**, the Debtors respectfully request entry of an order granting the relief requested herein, and granting the Debtors such other and further relief as may be just.

Dated: February 12, 2018.

Respectfully submitted,

/s/ J. Michael Sutherland

J. Michael Sutherland  
msutherland@ccsb.com

TBN 19524200

Michelle V. Larson

mlarson@ccsb.com

TBN 00796928

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& BLUMENTHAL, L.L.P.**

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Dallas, TX 75202

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(214) 855-1333 – Fax

***Proposed Counsel to the Debtors and  
Debtors-in-Possession***

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that he has conferred Mike Warner, on behalf of Hitachi on February 8 and 9, 2018, who, on the limited basis of the specific payment items reference above, agrees to the requested relief or the specified payment items.

/s/ J. Michael Sutherland

J. Michael Sutherland

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via ECF-Notice on all parties requesting such notice and via ECF-Notice and/or U.S. Regular Mail to the parties listed on the attached Service List, on this 12th day of February 2018.

/s/ J. Michael Sutherland  
J. Michael Sutherland

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