

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

In re:	§	
	§	Chapter 15 Case
	§	
ENERGERA, INC. (F/K/A FRAC SHACK INC.),	§	
	§	Case No. 26-90433 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

In re:	§	
	§	Chapter 15 Case
	§	
ENERGERA AMERICA INC. (F/K/A FRAC SHACK AMERICA INC.),	§	
	§	Case No. 26-90434 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

In re:	§	
	§	Chapter 15 Case
	§	
SANDTINEL LLC,	§	
	§	Case No. 26-90435 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 15 BANKRUPTCY CASE

Alvarez & Marsal Canada Inc., solely in its capacity as court-appointed receiver, manager, and authorized foreign representative (“Receiver” or “Foreign Representative”) of Energera, Inc. (formerly known as Frac Shack, Inc.) (“Energera”); Energera America Inc. (formerly known as Frac Shack America Inc.) (“Energera America”); and Sandtinel LLC (“Sandtinel,” and collectively with Energera and Energera America, the “Debtors”) pursuant to the *Consent Receivership Order*

dated and pronounced March 17, 2026 (the “Receivership Order”) entered by the Court of King’s Bench of Alberta in Judicial Centre of Edmonton, Alberta, Canada, Court File No. 2603-02889 (the “Canadian Court” and the “Canadian Proceeding”), pending under Canada’s *Bankruptcy and Insolvency Act* (“BIA”), files this *Notice of Designation as a Complex Chapter 15 Case*. The undersigned counsel of the Foreign Representative believes that this chapter 15 case qualifies as a complex chapter 15 case because:

- The Debtors have a total debt of more than \$10 million;
- There are more than 50 parties in interest in this case;
- Claims against the Debtor are publicly traded;
- Other (Substantial explanation is required. Attach additional sheets if necessary.)

Dated: March 30, 2026.

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ John D. Cornwell

John D. Cornwell

Texas Bar No. 24050450

Alexander R. Perez

Texas Bar No. 24074879

700 Milam Street, Suite 800

Houston, Texas 77002

Telephone: (713) 222-1470

Facsimile: (713) 222-1475

jcornwell@munsch.com

arperez@munsch.com

***Counsel for Alvarez & Marsal Canada Inc., Solely
in its Capacity as Court-Appointed Receiver and
Manager of the Debtors***

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

In re:	§	
	§	Chapter 15 Case
	§	
ENERGERA, INC. (F/K/A FRAC SHACK INC.),	§	
	§	Case No. 26-90433 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

In re:	§	
	§	Chapter 15 Case
	§	
ENERGERA AMERICA INC. (F/K/A FRAC SHACK AMERICA INC.),	§	
	§	Case No. 26-90434 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

In re:	§	
	§	Chapter 15 Case
	§	
SANDTINEL LLC,	§	
	§	Case No. 26-90435 (ARP)
	§	
Debtor in a Foreign Proceeding.	§	
	§	(Joint Administration Requested)
	§	

ORDER GRANTING COMPLEX CASE TREATMENT

This case was filed on March 30, 2026. *A Notice of Designation as Complex Chapter 15 Bankruptcy Case* was filed. Based on its review of the initial pleadings, the Court concludes that the complex case designation is appropriate. Accordingly, the Court orders:

1. The Procedures for Complex Cases in the Southern District of Texas apply to this case. The procedures are posted on the Court’s website. Compliance with the procedures is required.

2. The Debtors must give notice of this Order to all parties in interest within seven days. If a party-in-interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.

3. The Bankruptcy Local Rules apply to this case, subject to the following modifications:

- a. Bankruptcy Local Rule 1001-1(b) does not apply.
- b. Local District Court Civil Rule 83.1 applies.
- c. Appendix A to the Local Rules of the District Court applies.
- d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Signed: _____, 2026.

THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE