

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*The Honorable Frank E. Cuthbertson*  
Hearing Date: June 24, 2011  
Hearing Time: 9:00 a.m.  
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

In Re:  
MCUBE PETROLEUM, INC., a Washington  
corporation;  
BASILAM PETROLEUM, LLC, a  
Washington limited liability company;  
DISKI PETROLEUM, LLC, a Washington  
limited liability company;  
HALMAHERA - REMBANG, LLC, a  
Washington limited liability company;  
LARAMIE PETROLEUM, INC., a  
Washington corporation; and  
ORNA INTERNATIONAL, LTD, a British  
Virgin Islands company.

Case No. 09-2-08315-6

**NOTICE TO CREDITORS AND  
INTERESTED PARTIES OF HEARING  
ON RECEIVER'S MOTION TO  
APPROVE PAYMENT OF TAXES**

TO: THE CLERK OF THE COURT  
AND TO: THE HONORABLE FRANK E. CUTHBERTSON  
AND TO: ALL PARTIES-IN-INTEREST

Hearing Date: Friday, June 24, 2011  
Hearing Time: 9:00 a.m.  
Response Due: Tuesday, June 21, 2011  
Location: Pierce County Superior Court  
Judge Cuthbertson, Department 21  
930 Tacoma Avenue South, Tacoma, WA 98402

1 PLEASE TAKE NOTICE that William L. Beecher, in his capacity as Receiver for the  
2 entities identified in the above-captioned Receivership proceeding (the "Receiver"), will be  
3 filing a Motion with the Court seeking entry of an Order approving the payment of taxes owed  
4 to the U.S. Internal Revenue Service ("IRS") and the State of Washington.

5 Specifically, the Receivership Estate owes the IRS for unpaid employment taxes. There  
6 may also be sums owing to the State of Washington. The Receiver is preparing new tax returns  
7 for the above-captioned companies and has not yet determined that exact amount owed to the  
8 IRS.

9 On December 17, 2009, the IRS submitted a Claim against the Receivership Estate in the  
10 amount of \$220,000.00. Based on the information available to date, the liability for the 2007 tax  
11 year is \$180,711.78, exclusive interest and penalties which have not yet been determined.  
12 Nevertheless, the Receivership Estate currently possesses funds well in excess of any potential  
13 or actual tax liability.

14 Such amounts paid to the IRS and the State of Washington will be paid in priority to any  
15 distributions made to other creditors of the Receivership Estate. The amount of interest and  
16 penalties may ultimately be subject to negotiation. The Receiver is asking for authority to  
17 liquidate the sums owed to the IRS and the State of Washington and to pay such sums without  
18 further action by this Court. The Receiver is seeking this authority in part because the IRS is in  
19 the process of asserting these claims against individuals who may be secondarily liable for the  
20 obligations. The liquidation and payment of these claims will eliminate any liability for future  
21 interest and penalties both for the Receivership Estate and secondarily liable parties and is,  
22 therefore, in the best interests of the creditors of the Receivership Estate. Accordingly, time is  
23 of the essence and the fact that the claims have not been fully liquidated should not be allowed  
24 to delay payment.

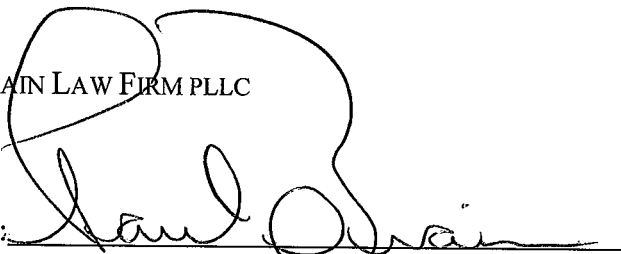
25 Any party desiring information as to the details of the Receiver's Motions may request  
26 same from the Clerk of the Court or from the undersigned counsel.

1 IF YOU OPPOSE the Motion, you must file your written response with the Clerk of the  
2 Court, serve two copies on the Judge's chambers and deliver copies to the undersigned  
3 NOT LATER THAN THE RESPONSE DATE, which is **June 21, 2011**.

4 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,  
5 GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and  
6 strike the hearing.

7 DATED this 20th day of May, 2011.

8 BRAIN LAW FIRM PLLC

9  
10  
11 By:   
12 Paul E. Brain, WSBA #13438

13 Counsel William L. Beecher, Receiver  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28