

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

HONORABLE FRANK E. CUTHBERTSON
Hearing Date: November 10, 2011
Hearing Time: 0900

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;
ORNA INTERNATIONAL, LTD, a British
Virgin Islands entity; and
LARAMIE PETROLEUM, INC., a
Washington corporation.

Case No. 09-2-08315-6

NOTICE TO CREDITORS AND
INTERESTED PARTIES OF
ACCELERATED HEARING ON
RECEIVER'S MOTION FOR SALE OF
CERTAIN RECEIVERSHIP ASSETS

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

Hearing Date: Thursday, November 10, 2011
Hearing Time: 9:00 a.m.
Response Due: Wednesday, November 9, 2011
Location: Pierce County Superior Court
930 Tacoma Avenue South, Tacoma, WA 98402

PLEASE TAKE NOTICE that William L. Beecher, in and only in his capacity as Receiver in
the above-captioned Receivership proceeding, has filed a motion with the Court seeking entry of an
order authorizing the sale of certain assets of the Receivership Estate, to wit, all ownership interests in
Orna International Ltd and Halmahera Petroleum Ltd, entities wholly owned by MCube Petroleum,

1 Inc., free and clear of liens, claims and encumbrances. Any party desiring information as to the details
2 of the proposed sale may request same from the Clerk of the Court or from the undersigned counsel.

3 The Receiver has further requested approval for the payment of professional
4 compensation pursuant to fee agreements already approved by the Court, based on receipts to the
5 Receivership Estate and/or its successors arising from this transaction. The total professional
6 compensation, including the contingent component of the compensation to the Receiver, would
7 be based on a total contingent fee of 33% of receipts to the Receivership Estate and/or its
8 successors. This is a standard rate for this market area. The first payment of US\$140,000.00
9 expected under the Transfer Agreement would result in professional compensation payable in the
10 amounts of \$42,000.00 to the attorneys for the Receiver and \$4,200.00 to the Receiver. Net
11 proceeds to the Receivership Estate from this first expected payment would be \$93,800.00.

12 IF YOU OPPOSE the motion, you must file your written response with the Clerk of the
13 Court, serve two copies on the Judge's chambers and deliver copies to the undersigned NOT LATER
14 THAN THE ACCELERATED RESPONSE DATE, which is Wednesday, November 9, 2011.

15 In the event this Court grants the Receiver's Motion to Sell Assets, any objection to the
16 Receiver's Motion that is filed and served subsequent to the Court's ruling be treated as a timely
17 motion for reconsideration of this Court's decision, so long as such objection is properly made
18 no later than December 8, 2011. Upon receipt, any such objection will be resolved by motion,
19 with five (5) days' notice to the objecting party only; such Motion would be heard by the Court
20 without oral argument.

21 IF NO RESPONSE IS FILED AND SERVED BY THE ACCELERATED RESPONSE
22 DATE, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING,
23 WITHOUT FURTHER NOTICE, and strike the hearing.

24 DATED this 4th day of November 2011.

25 ANDERSON LAW FIRM PLLC

26 

27 MARK B. ANDERSON, WSBA #25895
28 Attorneys for Receiver William L. Beecher