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

In re:	)	Chapter 11
ALEON METALS, LLC *et al.*,[1]	)	Case No. 25-90305 (CML)
Debtors.	)	(Jointly Administered)

DEBTORS' MOTION FOR ENTRY OF AN ORDER
(I) EXTENDING THE DEBTORS' EXCLUSIVE PERIODS TO
FILE AND SOLICIT A PLAN; AND (II) GRANTING RELATED RELIEF

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Aleon Metals, LLC and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") respectfully state as follows in support of this motion (this "Motion"):

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Aleon Metals, LLC (1610); Aleon Renewable Metals, LLC (9215); and Gladieux Metals Recycling, LLC (6057). The location of the Debtors' service address is: P.O. Box 2290, 302 Midway Road, Freeport, TX 77542.

Preliminary Statement[2]

1. Less than four months into these cases, the Debtors have accomplished what they set out to do at the outset: close a going concern sale of their assets that preserves jobs, addresses environmental obligations, and enables distributions to be made to unsecured creditors. The Debtors originally sought to exit these cases through a "structured dismissal." Based on the guidance of the Court, however, the Debtors, along with their principal economic stakeholders—the Official Committee of Unsecured Creditors and the Debtors' prepetition bondholders—have determined to pursue a plan of liquidation.

2. As previewed at the recent hearing on the Motion to Dismiss, the parties anticipate filing a plan prior to year end, with confirmation and effectiveness to follow in the first quarter of 2026. In order to ensure that these Chapter 11 Cases are not disrupted at this critical juncture, the Debtors seek an extension of their exclusive periods to file and solicit acceptances of a plan by 91 days. For the reasons set forth herein, the Motion should be approved.

Relief Requested

3. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto (the "Order"): (i) extending by 91 days (a) the period during which the Debtors have the exclusive right to file a chapter 11 plan (the "Exclusive Filing Period") through and including March 16, 2026, and (b) the period during which the Debtors have the exclusive right to solicit a plan (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods") through and including May 15, 2026 without prejudice to the Debtors' rights to seek further extensions of the Exclusive Periods, and (ii) granting related relief. The

[2] Capitalized terms used but not otherwise defined in this Preliminary Statement shall have the meanings ascribed to such terms in the Motion below.

Debtors' initial Exclusive Filing Period and Exclusive Solicitation Period are currently set to expire on December 15, 2025, and February 13, 2026, respectively.[3]

Jurisdiction and Venue

4. The United States Bankruptcy Court for the Southern District of Texas (this "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and the Court may enter a final order consistent with Article III of the United States Constitution.

5. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

6. The statutory bases for the relief requested herein are pursuant to section 1121 of title 11 of the United States Code (the "Bankruptcy Code"), rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Local Bankruptcy Rules"), and the Procedures for Complex Cases in the Southern District of Texas.

Background

7. On August 17, 2025 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

8. On August 28, 2025, the United States Trustee for the Southern District of Texas (the "US Trustee") appointed the Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [Docket No. 97]. No party has requested the appointment of a trustee or examiner in these Chapter 11 Cases.

[3] Rule K.30 of the Procedures for Complex Cases in the Southern District of Texas provides that "if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules . . . the time for taking the action is automatically extended until the Court rules on the motion." By filing this Motion prior to the expiration of the Exclusive Periods, such deadlines are automatically extended until the Court resolves the Motion.

9. A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors' Chapter 11 Cases, is set forth in the *Declaration of Roy Gallagher in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 2] (the "First Day Declaration"), which is incorporated herein by reference.

Progress of the Chapter 11 Cases to Date

10. The Debtors filed the Chapter 11 Cases approximately four months ago. Since commencing such cases, the Debtors have made significant progress on many fronts.

11. In addition to obtaining various forms of "first day" relief that afforded the Debtors a smooth entry into Chapter 11 from an operational standpoint, the Debtors secured postpetition financing to enable them to meet their obligations during the pendency of the Chapter 11 Cases. On September 16, 2025, the Court entered the Final DIP Order[4] authorizing the Debtors to, among other things, obtain up to approximately $187.5 million in debtor-in-possession financing to be provided by certain of the Debtors' prepetition bondholders. This financing provided the Debtors with access to necessary funding to maintain their operations during these Chapter 11 Cases, administer the sale process, and satisfy the administrative costs of the Chapter 11 Cases.

12. On the Petition Date, the Debtors also sought approval of proposed bid procedures (the "Bid Procedures") in connection with a sale of substantially all of the Debtors' assets (the "Sale"). On August 22, 2025, the Court entered an order approving the Bid Procedures [Docket No. 79] (as corrected at Docket No. 88, the "Bid Procedures Order"). However, the Debtors received no additional qualified bids prior to the Bid Deadline, other than the Stalking Horse Bid (as defined in the Bid Procedures Order). On October 1, 2025, the Debtors cancelled

[4] The "Final DIP Order" refers to the *Final Order (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims, and (B) Adequate Protection to the Prepetition Secured Parties; (III) Authorizing the Use of Cash Collateral; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief* [Docket No. 132].

the auction and declared the Stalking Horse Bidder's designee, AM BidCo Operations LLC, the successful bidder [Docket No. 185].

13. On September 19, 2025, the Court entered an order [Docket No. 154] (the "Bar Date Order") which established October 21, 2025 as the deadline for non-governmental creditors to file proofs of claim for claims arising before the Petition Date. The deadline for governmental creditors to file claims is February 13, 2026.

14. On October 1, 2025, the Debtors filed their respective Schedules of Assets and Liabilities and Statements of Financial Affairs (collectively, the "Schedules") [Docket Nos. 189-94].

15. On October 8, 2025, the Court entered the *Order (I) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* (the "Sale Order") [Docket No. 222], which approved the terms of the Sale, including the asset purchase agreement attached thereto as Exhibit A (as amended, the "APA"). The APA and Sale Order incorporate the terms of a global settlement reached by and among the Debtors, the Committee, the DIP Secured Parties (as defined in the Final DIP Order) and the Purchaser (as defined in the Sale Order). The Sale Order also contemplates the establishment of a trust (the "GUC Trust") for the benefit of unsecured creditors, which would oversee the administration of claims against the Debtors' estates and investigate (and, if appropriate, prosecute) commercial tort claims and certain avoidance actions belonging to the estates.

16. On October 21, 2025, the Sale closed. *See* Docket No. 269.

17. On October 21, 2025, the Debtors and the Committee filed the *Joint Motion of the Debtors and the Committee for Entry of an Order (A) Approving (I) Omnibus Claim Objection*

Procedures, (II) the Form of Objection Notice, and (III) the Filing of Substantive Omnibus Claim Objections, and (B) Granting Related Relief [Docket No. 264] (the "Omnibus Claim Objection Procedures Motion"), pursuant to which the Debtors and the Committee sought approval of procedures for filing and resolving objections to claims asserted against the Debtors in these Chapter 11 Cases. The Court entered an order approving the Omnibus Claim Objection Procedures Motion on November 17, 2025 [Docket No. 297].

18. On October 21, 2025, the Debtors also filed the *Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Dismissing Certain of the Debtors' Chapter 11 Cases; (II) Approving Procedures for Dismissal of the Remaining Chapter 11 Case; (III) Setting Administrative Claims Bar Date and Objection Deadline; (IV) Establishing Procedures for the Allowance and Payment of Professional Fees; (V) Rejecting Executory Contracts and Unexpired Leases; (VI) Authorizing the Distribution of the Debtors' Remaining Assets; (VII) Authorizing the Abandonment of the Debtors' Books and Records; (VIII) Dissolving the Debtors; and (IX) Granting Related Relief* [Docket No. 268] (the "Motion to Dismiss"), pursuant to which the Debtors and the Committee sought the dismissal of these Chapter 11 Cases and certain related relief to provide for the efficient and orderly wind-down of the Debtors' estates. On November 14, 2025, the Debtors filed a revised form of proposed order approving the Motion to Dismiss, which included, among other things, the GUC Trust Agreement, the terms of which were consensually agreed-upon by and among the Debtors, the Committee, and the DIP Secured Parties.

19. At the continued hearing on the Motion to Dismiss on December 2, 2025 (the "Continued Dismissal Hearing"), the Debtors, the Committee, and the DIP Secured Parties, consensually agreed to pivot from the proposed structured dismissal of these Chapter 11 Cases to

a chapter 11 plan process to resolve related comments from the Court and the US Trustee regarding the Motion to Dismiss. *See* Docket No. 333.

Basis for Relief

20. Against the backdrop of this significant progress and out of an abundance of caution to prevent any unnecessary litigation or disruptive filings that may interfere with the orderly and efficient resolution of these Chapter 11 Cases, the Debtors now seek to extend the Exclusive Periods.

21. The Bankruptcy Code provides for an initial period of 120 days after the commencement of a chapter 11 case during which a debtor has the exclusive right to file a chapter 11 plan. 11 U.S.C. § 1121(b). The Bankruptcy Code further provides that if a debtor files a plan within that 120-day period, it has a 180-day period from its petition date to solicit acceptance of its plan. 11 U.S.C. § 1121(c)(3). This time of exclusivity affords a debtor an opportunity to propose a chapter 11 plan and solicit acceptances thereof without the potential value deterioration and disruption to business operations that would ensue from the filing and solicitation of competing plans by non-debtor parties.

22. Under section 1121(d)(1) of the Bankruptcy Code, the Court may extend the Exclusive Periods "for cause." Although the Bankruptcy Code does not define the term "cause" for purposes of section 1121(d), or establish formal criteria for an extension of the Exclusive Periods, the legislative history indicates that "cause" should be interpreted in such a way "to allow the debtor to reach an agreement." H.R. Rep. No. 95-595, at 231-32 (1978), as reprinted in 1978 U.S.C.C.A.N. 5963, 6191. Bankruptcy courts are accorded broad discretion in determining whether an extension of exclusivity is likely to promote the orderly, consensual, and successful reorganization of a debtor's affairs and, therefore, cause for such extension exists. *See, e.g.*, *In re Timbers of Inwood Forest Assocs., Ltd.*, 808 F.2d 363, 372 (5th Cir. 1987) ("cause" under

section 1121 should be viewed in the context of the Bankruptcy Code's goal of fostering reorganization); *In re Mirant Corp.*, 2004 WL 2250986, at *2 (N.D. Tex. Sept. 30, 2004) (extension is often granted where the "debtor has shown substantial progress toward reorganization"); *see also In re Burns & Roe Enters., Inc.*, 2005 WL 6289213, at *4 (D.N.J. Nov. 2, 2005) (noting that the exclusive periods under section 1121 of the Bankruptcy Code are intended "to promote an environment in which the debtor's business may be rehabilitated and a consensual plan may be negotiated" (quoting H.R. Rep. No. 103-835, at 36 (1994), as reprinted in 1994 U.S.C.C.A.N. 3340, 3344)).

23. Courts may consider a variety of factors in determining whether "cause" exists to extend a debtor's exclusive period for filing a plan, including:

a) the size and complexity of the case;

b) the need for sufficient time to permit the debtor to negotiate a plan of reorganization and prepare adequate information;

c) whether the debtor has made progress in negotiations with its creditors;

d) the existence of good-faith progress toward reorganization;

e) whether the debtor is seeking to extend exclusivity to pressure creditors to accede to the debtor's reorganization demands;

f) whether the debtor has demonstrated reasonable prospects for filing a viable plan;

g) the fact that the debtor is paying its bills as they become due;

h) the amount of time which has elapsed in the case; and/or

i) whether an unresolved contingency exists.

See, e.g., *In re New Millennium Mgmt., LLC*, 2014 WL 792115, at *6 (Bankr. S.D. Tex. Feb. 25, 2014) (listing factors relevant to whether "cause" exists to extend exclusivity periods) (citing *In re GMG Cap. Partners III, L.P.*, 503 B.R. 596 (Bankr. S.D.N.Y. 2014)).

24. Not all factors are relevant to every case, and the presence of only a subset of the above-listed factors may be sufficient to extend a debtor's exclusivity periods. *See, e.g.*, *In re Express One Int'l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (listing all nine factors but relying on only four in determining whether there was "cause" to extend exclusivity); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (finding that the debtor showed "cause" to extend exclusivity based upon three of the factors); *In re Pine Run Trust, Inc.*, 67 B.R. 432, 435 (Bankr. E.D. Pa. 1986) (relying on two factors in holding that cause existed to extend exclusivity). The application of these factors to the facts and circumstances of the Chapter 11 Cases demonstrates that the requested extension of the Exclusive Periods is both appropriate and necessary.

25. *First*, the size and complexity of the Debtors' business and industry, which requires Debtors to navigate complex issues in these Chapter 11 Cases warrants approval of the requested relief. The Debtors owned and operated the largest petroleum catalyst recycling facility of its kind in North America. The cases have involved numerous first and second day motions, employment of a broad slate of professionals, the effectuation of the Sale, and the administration of assets and claims for each of the Debtors. The size of Debtors' capital structure is also large and complex, consisting of over $400 million in funded debt.

26. *Second*, termination of the Exclusive Periods at the statutory dates would adversely impact the Debtors' efforts to preserve and maximize the value of their estates and advance these Chapter 11 Cases. Prior to the conclusion of the sale process, the Debtors, in consultation with the DIP Secured Parties and the Committee, identified a plan-based exit as a viable exit path for these Chapter 11 Cases. Consistent with this direction, the Debtors undertook substantive work to prepare a confirmable plan and disclosure statement. After careful consideration and consultation

with the DIP Secured Parties and the Committee, the Debtors determined that a structured dismissal effectuated through the Motion to Dismiss represented the most efficient and cost-effective means to conclude these Chapter 11 Cases and maximize recoveries for unsecured creditors. As described above, the Debtors, the Committee, and the DIP Secured Parties announced their agreement at the Continued Dismissal Hearing to pivot back to a chapter 11 plan process in light of comments from the Court and the US Trustee, and the Debtors have refocused their efforts on negotiating and finalizing a consensual and confirmable plan and disclosure statement.

27. Between these recent developments and the fact that less than four months have passed since the Petition Date, the Debtors have not had sufficient time to consult with the parties in interest and finalize the chapter 11 plan. If exclusivity were terminated, the Debtors could face the prospect of competing plans, which would introduce uncertainty and potentially delay the progress made toward a value-maximizing resolution. Granting the requested extensions will allow the Debtors to move toward plan confirmation without the distraction, cost, and delay of a competing plan process. *See In re Energy Conversion Devices, Inc.*, 474 B.R. 503, 507 (Bankr. E.D. Mich. 2012) ("In enacting 11 U.S.C. § 1121, Congress intended to allow the debtor a reasonable time to obtain confirmation of a plan without the threat of a competing plan. It was intended that . . . a debtor should be given the unqualified opportunity to negotiate a settlement and propose a plan of reorganization without interference from creditors and other interests.") (citation and internal quotation marks omitted).

28. *Third*, notwithstanding the short duration of these cases, the Debtors have made substantial progress to date. As discussed above, the Debtors have (i) secured critical first and second day relief, (ii) obtained Court approval of the Debtors' debtor-in-possession financing on

interim and final bases, (iii) retained a variety of necessary professionals to successfully and efficiently administer the Debtors' estates, as well as obtained Court approval of related compensation procedures, (iv) drafted and filed the Schedules, (v) obtained Court approval of both the Bid Procedures and the Sale, which successfully closed on October 21, 2025, (vi) established bar dates for the filing of proofs of claim and the approval of procedures for the filing of omnibus claims objections, (vii) established assumption and rejection procedures for the Debtors' executory contracts, and (viii) designed and effectuated the strategy for the implementation of the sale transactions and the wind-down of the Debtors' estates through ongoing negotiations with key parties in interest, including regarding the forthcoming chapter 11 plan. The Debtors' advancement of their restructuring efforts demonstrates meaningful progress toward a successful reorganization and satisfaction of the third and fourth factors.

29. *Fourth*, the Debtors do not seek the extension of the Exclusive Periods as a means to exert pressure on the relevant parties in interest. Instead, the extension will allow the Debtors to continue making progress with key stakeholders on the forthcoming chapter 11 plan. The Debtors seek the requested extension of the Exclusive Periods out of an abundance of caution to ensure the progress made to date is not upended by a potential loss of their Exclusive Periods. In the context of these Chapter 11 Cases, granting the requested extensions of the Exclusive Periods will not pressure the Debtors' creditor constituencies or grant the Debtors any unfair bargaining leverage. Accordingly, the fifth factor weighs in favor of extending the Exclusive Periods.

30. *Finally*, the Debtors continue to make timely payments on their undisputed postpetition obligations. Accordingly, the seventh factor weighs in favor of extending the Exclusive Periods. For each and all of the foregoing reasons, good cause exists to extend the Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code.

Notice

31. Notice of this Motion will be given to the parties on the Debtors' Master Service List and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

32. A copy of this Motion is available on (a) the Court's website, at www.txs.uscourts.gov, and (b) the website maintained by the Debtors' Claims and Noticing Agent, Stretto, Inc., at https://cases.stretto.com/aleonmetals.

[Concludes on following page]

WHEREFORE, the Debtors respectfully request that the Court enter the Order, granting the relief requested in this Motion and such other and further relief as may be just and proper.

Houston, Texas
Dated: December 8, 2025

/s/ Jason L. Boland

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CERTIFICATE OF SERVICE

I certify that on December 8, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Maria Mokrzycka
Maria Mokrzycka

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

In re:	Chapter 11
ALEON METALS, LLC *et al.*,[1]	Case No. 25-90305 (CML)
Debtors.	(Jointly Administered)

ORDER (I) EXTENDING THE DEBTORS' EXCLUSIVE PERIODS
<u>TO FILE AND SOLICIT A PLAN; AND (II) GRANTING RELATED RELIEF</u>
[Relates to Docket No. ___]

Upon the motion (the "<u>Motion</u>")[2] of the above-captioned debtors and debtors in possession (the "<u>Debtors</u>") for entry of an order (this "<u>Order</u>") (i) extending by 91 days (a) the period during which the Debtors have the exclusive right to file a chapter 11 plan (the "<u>Exclusive Filing Period</u>") through and including March 16, 2026, and (b) the period during which the Debtors have the exclusive right to solicit a plan (the "<u>Exclusive Solicitation Period</u>" and, together with the Exclusive Filing Period, the "<u>Exclusive Periods</u>") through and including May 15, 2026, without prejudice to the Debtors' rights to seek further extensions of the Exclusive Periods, and (ii) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b) and that the Court may enter a final order consistent with Article III of the United States

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Aleon Metals, LLC (1610); Aleon Renewable Metals, LLC (9215); and Gladieux Metals Recycling, LLC (6057). The location of the Debtors' service address is: P.O. Box 2290, 302 Midway Road, Freeport, TX 77542.

[2] Capitalized terms used but not defined herein have the meanings given to them in the Motion.

Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and the Court having found that the Debtors provided appropriate notice of the Motion and the opportunity for a hearing on the Motion under the circumstances and that no other or further notice is necessary; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion and the hearing, if any, with respect to the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Debtors' Exclusive Filing Period is extended through and including March 16, 2026.

3. The Debtors' Exclusive Solicitation Period is extended through and including May 15, 2026.

4. The extension of the Exclusive Periods granted herein is without prejudice to the Debtors' right to seek further extensions pursuant to section 1121(d) of the Bankruptcy Code.

5. All time periods set forth in the Motion or this Order shall be calculated in accordance with Rule 9006(a) of the Federal Rules of Bankruptcy Procedure.

6. Notice of the Motion as provided therein is good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules and the Local Bankruptcy Rules are satisfied by such notice.

7. The Debtors are authorized to take all reasonable actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.