

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re: Involuntary Chapter 7
ERP Iron Ore, LLC, 18-50378-RJK
Debtor.

CONVERSION OF CASE BY DEBTOR

CONVERSION OF CHAPTER7 CASE TO CHAPTER11CASE

1. This bankruptcy case was commenced by involuntary petition filed by Glacier Park Iron Ore Properties LLC, Chester Company Limited, HT Surface and Mineral LLC and Allete, Inc. d/b/a Minnesota Power (the "Petitioning Creditors") under chapter 7 of the Bankruptcy Code on May 25, 2018. Conversion of this case by ERP Iron Ore, LLC (the "Debtor") to a chapter 11 case is allowed under §706(a) of the Bankruptcy Code.

2. The Debtor hereby converts this case to a chapter 11 case under §§ 348 and 706(a) of the Bankruptcy Code.

3. The current address for the Debtor is as follows:

ERP Iron Ore, LLC
15 Appledore Lane
Natural Bridge, VA 24578

WHEREFORE, the Debtor requests relief in accordance with chapter 11 of the Bankruptcy Code and declares under penalty of perjury that the information provided in this conversion is true and correct.

Dated: July 16, 2018

RAVICH MEYER KIRKMAN McGRATH
NAUMAN & TANSEY,
A PROFESSIONAL ASSOCIATION

By: /e/ Will R. Tansey
Will R. Tansey (323056)
Michael F. McGrath (168610)

150 South Fifth Street, Suite 3450
Minneapolis, MN 55402
(612) 332-8511

ATTORNEYS FOR DEBTOR

VERIFICATION

I, Todd Roth, Chief Executive Officer of the Debtor, declare under penalty of perjury that the facts set forth in the foregoing Conversion of Case by Debtor are true and correct according to the best of my knowledge, information and belief.

Executed on: July 16, 2018

A handwritten signature in black ink, appearing to read 'TR', is written over a horizontal line.

Todd Roth

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Case No. 18-50378

ERP Iron Ore, LLC,

Involuntary Chapter 7

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I, Will R. Tansey, declare under penalty of perjury that on July 17, 2018, I caused the following document(s) to be served:

1. Conversion of Case by Debtor;

by sending true and correct copies via ECF to the parties as stated below:

- Richard D Anderson randerson@briggs.com, mjacobson@briggs.com
- William J Brunnquell william.brunnquell@faegrebd.com
- Monica L. Clark clark.monica@dorsey.com, yokiel.maryjo@dorsey.com
- Benjamin Gurstelle bgurstelle@briggs.com, soneill@briggs.com
- Thomas J. Hainje thainje@winthrop.com, enorgaard@winthrop.com
- Christopher J. Knapp christopher.knapp@btlaw.com, marie.robinson@btlaw.com
- Connie A. Lahn clahn@btlaw.com, marobinson@btlaw.com;sofia.shaw@btlaw.com
- Oscar N Pinkas oscar.pinkas@dentons.com, lauren.macksoud@dentons.com
- Paul L. Ratelle pratelle@fwhtlaw.com, dsalazkin@fwhtlaw.com
- Michael Rosow mrosow@winthrop.com, shaug@winthrop.com
- David E. Runck david.runck@fmjlaw.com, sherri.debettignies@fmjlaw.com
- Dennis M Ryan dennis.ryan@faegrebd.com
- James K. Sander jsander@larkinhoffman.com
- US Trustee ustregion12.mn.ecf@usdoj.gov
- Natasha Wells wells.natasha@dorsey.com, ridley.jean@dorsey.com

Dated: July 17, 2018

By: /e/ Will R. Tansey (323056)

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