

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

---

In re:

Energy Alloys Holdings, LLC, *et al.*,<sup>1</sup>

Debtors.

---

)

) Chapter 11

)

) Case No. 20-12088 (MFW)

)

) (Jointly Administered)

)

) **Re: Docket No. 56**

)

**SUPPLEMENTAL DECLARATION OF  
TIM CONKLIN IN SUPPORT OF DEBTORS' APPLICATION TO  
RETAIN AND EMPLOY EPIQ CORPORATE RESTRUCTURING, LLC AS  
ADMINISTRATIVE ADVISOR NUNC PRO TUNC TO THE PETITION DATE**

I, Tim Conklin, under penalty of perjury, declare as follows:

1. I am a Consultant at Epiq Corporate Restructuring, LLC ("**Epiq**"). The matters set forth herein are made of my own personal knowledge and, if called and sworn as a witness, I could and would testify competently thereto.<sup>2</sup>

2. On September 22, 2020, the above-captioned debtors and debtors-in-possession the (the "**Debtors**") filed the *Debtors' Application to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor Nunc Pro Tunc to the Petition Date* [Docket No. 56] (the "**Application**")<sup>3</sup>, for an order authorizing the Debtors to retain and employ Epiq as their administrative advisor ("**Administrative Advisor**") in the above-captioned chapter 11 cases (the

---

<sup>1</sup> The Debtors, together with the last four digits of each Debtor's federal tax identification number, are: Energy Alloys Holdings, LLC (4144); Energy Alloys, L.L.C. (9944); Energy Alloys Louisiana, LLC (0623); Energy Alloys Canada Holding, L.L.C. (0382); Energy Alloys Services, L.L.C. (4284); Energy Alloys Cayman Holding, L.L.C. (3484); Energy Alloys Mexico Holding Co. - Majority, LLC (9165); Energy Alloys Mexico Holding Co. - Minority, LLC (N/A). The mailing address for the Debtors is 9450 Pinecroft Drive, P.O. Box 8819, The Woodlands, TX 77380.

<sup>2</sup> Certain of the disclosures herein relate to matters within the knowledge of other professionals at Epiq and are based on information provided by them.

<sup>3</sup> Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms in the Application.

“**Chapter 11 Cases**”). In connection with the Debtors’ retention of Epiq as Administrative Advisor in these Chapter 11 Cases, I provided a declaration (the “**Declaration**”) in support of the Application, attached thereto as **Exhibit B**.

3. I hereby submit this supplemental declaration (the “**Supplemental Declaration**”) in further support of the Application.

4. As set forth in paragraph 8 of the Declaration, in connection with the preparation thereof, I caused to be submitted for review by our conflicts system the names of all known potential parties in interest (the “**Potential Parties in Interest**”) in these Chapter 11 Cases. Attached hereto as **Exhibit 1** is a copy of the Potential Parties in Interest List.

5. To the extent that Epiq discovers any connection with any interested party or enters into any new relationship with any interested party, Epiq will promptly supplement its disclosure to the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: October 9, 2020

/s/ Tim Conklin

Tim Conklin

Consultant

Epiq Corporate Restructuring, LLC

**Exhibit 1**

**Potential Parties in Interest List**

**Parties in Interest**

**1. Debtors**

Energy Alloys Holdings, LLC  
Energy Alloys, L.L.C.  
Energy Alloys Louisiana, LLC  
Energy Alloys Canada Holding, L.L.C.  
Energy Alloys Services, L.L.C.

Energy Alloys Cayman Holding, L.L.C.  
Energy Alloys Mexico Holding Co.  
Majority, LLC  
Energy Alloys Mexico Holding Co.  
Minority, LLC

**2. Non-Debtor Affiliates**

Energy Alloys International Holdings B.V.  
Energy Alloys Korea LTD  
Energy Alloys International Middle East,  
LTD  
Energy Alloys UK Limited  
Energy Alloys International B.V.  
Energy Alloys De Mexico S DE R.L.  
DEC.V.

Energy Alloys Malaysia SDN, SHD  
Energy Alloys PTE. LTD  
Energy Alloys Middle East, LTD

**3. Equity Holders**

Blackstone/GSO Capital Solutions Fund  
L.P.  
GSO CSOMF Energy Alloys, Inc.

Thomas Slaughter  
Gregg Taylor  
Kevin Burnett

**4. Debtors' Restructuring Professionals**

Akin Gump Strauss Hauer & Feld LLP  
Ankura Consulting Group, LLC  
Epiq Bankruptcy Solutions LLC  
Hilco Industrial, LLC

Moelis & Company  
Richards Layton & Finger, P.A.

**5. Debtors' Ordinary Course Professionals**

Deloitte Tax LLP  
Weinstein Spira & Company PC  
J Joseph

**6. Major Secured Lenders, Administrative Agents, Banks, and UCC Lien Parties**

TPG Specialty Lending, Inc.  
Blackstone  
Blackstone / GSO Capital Solutions Fund  
L.P.

GSO CSOMF Energy Alloys, Inc.  
Wilmington Trust, National Association

PNC Bank, National Association

**7. Major Secured Lenders' Professionals**

Schulte Roth & Zabel LLP  
Proskauer Rose LLP

**8. Current Officers and Directors**

Anindya Mishra  
Eric Nadan  
Doris Stuart

Gary Halverson  
James Bennett  
Patrick Bartels

**9. Former Officers and Directors**

Anthony Borreca  
D. Dwight Scott  
Dave Warren  
David Posnick  
Gregg Taylor

John Warren  
Kenney Duke  
Neil Thomas

**10. Utility Providers**

AT&T  
Centerpoint Energy Services, Inc.  
City of Conroe Texas  
City of Houston Texas  
City of Tulsa Oklahoma  
Comcast  
Entergy

Frontier Communications  
Level 3 Communications)  
Public Service Company of Oklahoma  
Republic Services  
Summer Energy  
Waste Management

**11. Significant Unsecured Creditors**

3 Waterway Holdings LLC  
A Dependable Logistics, Inc.  
Alvarez & Marsal  
BGH Edelstahlwerke GmbH  
DSV Road, Inc.  
Eaton Steel Corporation  
ESP Specialty Steel Products  
Fortis Alliance  
Frisa Metals LLC  
Groves Industrial Supply  
HDH Instruments Corp

Liberty Speciality Steel  
Lone Star Heat Treating Corp  
Magellan Corporation  
Marubeni-Itochu Tubulars America Inc.  
Oracle USA, Inc.  
Pentagon Freight Services, Inc  
PTSolutions  
Schmolz & Bichenbach International  
Scot Forge Company  
SeAH Steel America  
Sigma Tube & Bar

Specialty Heat Treat Inc  
Specialty Pipe & Tube  
TDC Integrated Services  
TMK ARTROM, S.A.  
Transportation Insight

Trek Metals Inc.  
Triple S Tube Supply, LP  
Vallourec USA Corp.

**12. Significant Customers**

Schlumberger  
Halliburton  
National Oilwell Varco

Baker Hughes  
Weatherford

**13. Counterparties to Significant Real Property and Personal Property Leases**

3 Waterway Holdings LLC  
FRC Genesis Fundsub III, LLC  
Howard Hughes Howard Hughes  
Management Services Company

The Howard Hughes Corporation

**14. Parties to Litigation**

A Dependable Logistics, Inc.  
ESP Specialty Steel Products, LLC

Pusan Pipe America, Inc. (d/b/a SeAH Steel  
America, Inc.)

**15. Insurers and Brokers**

ACE American Insurance Company  
ACE Property & Casualty Insurance  
Company  
AmWINS Transportation Underwriters  
AXIS Insurance Company  
Chubb Insurance Company of Canada  
Continental Casualty Company  
Hiscox Insurance Company  
Lloyds of London

RSUI Indemnity Company  
Starr Indemnity & Liability Company  
Starr Surplus Lines Insurance Company  
Westchester Fire Insurance Company  
Westport Insurance Corporation  
XL Specialty Insurance Company

**16. Major Competitors**

BioUrja Group through subsidiary Hamilton  
Metals Reliance Steel (through subsidiaries  
Triple-S Tube Supply, LP  
Howco Group plc

Sunbelt and Continental)

**17. Taxing and Other Significant Governmental Authorities**

ALDINE ISD	HM1- Mont Co Hospital
CAD- Appraisal District	HOU COMMUNITY
CCO- City Of Conroe	COLLEGE
City of Houston	HOUSTON ISD
CITY OF PATTISON	JNH- Lone Star College
CWT- The Woodlands	LAFAYETTE PARISH
Township	Lone Star College System
CYPRESS-FAIRBANKS	MWM- Woodlands Mtro
ISD	Mud
GMO- Montgomery Cnty	Port of Houston Authority
Harris County	ROYAL ISD
Harris County Dept. of	RU1- Woodlands Rd Util #1
Education	SCO- Conroe ISD
Harris County Flood Control	SPRING BRANCH ISD
Dist	SWI- Willis ISD
Harris County Hospital	TULSA COUNTY
District	WALLER CAD
HC EMERG SRV DIST 1	WALLER CO FM
HC EMERG SRV DIST 9	WALLER COUNTY
HC EMERG SRV DIST 24	WALLER-HARRIS ESD 200
HC EMERG SRV DIST 25	

**18. United States Bankruptcy Judges and Staff in the District of Delaware**

The Honorable Brendan L. Shannon	Donna Grottini
The Honorable Christopher S. Sontchi,	Janet Moore
Chief Judge	Jill Walker
The Honorable John T. Dorsey	Karen Strupczewski
The Honorable Karen B. Owens	Laura Haney
The Honorable Laurie Selber Silverstein	Laurie Capp
The Honorable Mary F. Walrath	Lora Johnson
Cacia Batts	Marquetta Lopez
Catherine Farrell	Rachel Bello
Cheryl Szymanski	Rachel Werkheiser
Claire Brady	Robert Cavello
Danielle Gadson	Sherry Scaruzzi

**19. United States Trustee for the District of Delaware and Key Staff Members**

Benjamin Hackman	Diane Giordano
Christine Green	Dion Wynn
David Buchbinder	Edith A. Serrano
David Villagrana	Hannah M. McCollum
Denis Cooke	Holly Dice

James R. O'Malley  
Jane Leamy  
John Schanne  
Joseph McMahon  
Juliet Sarkessian  
Karen Starr  
Lauren Attix  
Linda Casey  
Linda Richenderfer

Michael Panacio  
Nyanquoi Jones  
Ramona Vinson  
Richard Schepacarter  
Rosa Sierra  
Shakima L. Dortch  
T. Patrick Tinker  
Timothy J. Fox, Jr.

**20. Clerk of Court and Deputy for the District of Delaware**

Stephen Grant  
Una O'Boyle