

**Exhibit B**

**White Declaration**

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

*In re*

HOSPITALITY INVESTORS TRUST, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 21-10831 (CTG)

(Joint Administration Requested)

**DECLARATION OF  
ROBERT WHITE IN SUPPORT  
OF DEBTORS' APPLICATION FOR ENTRY  
OF AN ORDER (I) AUTHORIZING THE RETENTION  
AND EMPLOYMENT OF JEFFERIES LLC AS INVESTMENT  
BANKER FOR THE DEBTORS AND DEBTORS IN POSSESSION  
PURSUANT TO 11 U.S.C. §§ 327(a) AND 328(a), EFFECTIVE AS OF THE  
PETITION DATE AND (II) WAIVING CERTAIN TIME-KEEPING REQUIREMENTS**

I, Robert White, hereby declare under penalty of perjury that, to the best of my knowledge and belief, and after reasonable inquiry, the following is true and correct:

1. I am a Managing Director at Jefferies LLC ("Jefferies"), an investment banking and financial advisory firm with principal offices located at 520 Madison Avenue, New York, New York 10022, as well as at other locations worldwide.

2. I submit this Declaration (this "Declaration") in support of the application (the "Application")<sup>2</sup> of the above-captioned debtors and debtors in possession in these proceedings (collectively, the "Debtors") for an order authorizing the Debtors to retain and employ Jefferies as

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<sup>1</sup> The Debtors in these chapter 11 cases (these "Chapter 11 Cases"), along with the last four digits of each Debtor's federal tax identification number, are: Hospitality Investors Trust, Inc. (3668) and Hospitality Investors Trust Operating Partnership, L.P. (0136). The Debtors' executive offices are located at Park Avenue Tower, 65 East 55th Street, Suite 801, New York, NY 10022.

<sup>2</sup> Capitalized terms used in this Declaration and not immediately defined have the meanings given to such terms in the Application.

their investment banker, effective as of the Petition Date, pursuant to the terms and subject to the conditions of the Engagement Letter.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and, if called as a witness, I would testify thereto. Certain of the disclosures herein, however, relate to matters within the personal knowledge of other professionals at and representatives of Jefferies and are based on information provided by such professionals.

### **JEFFERIES' QUALIFICATIONS**

4. I believe that Jefferies and the professionals it employs are uniquely qualified to advise the Debtors on the matters for which Jefferies is proposed to be employed in a cost-effective, efficient, and timely manner.

5. Jefferies is a registered broker-dealer with the United States Securities and Exchange Commission and a member of the Boston Stock Exchange, the International Stock Exchange, the Financial Industry Regulatory Authority, the Pacific Stock Exchange, the Philadelphia Stock Exchange, and the Securities Investor Protection Corporation. Jefferies was founded in 1962 and is a wholly-owned subsidiary of Jefferies Group LLC, which, together with its affiliates, has gross assets of approximately \$51 billion and approximately 4,000 employees in more than 30 offices around the world.

6. Jefferies provides a broad range of corporate advisory services to its clients including, without limitation, services relating to the following: (a) general financial advice; (b) mergers, acquisitions, and divestitures; (c) special committee assignments; (d) capital raising; and (e) corporate restructurings. Jefferies and its senior professionals have extensive experience in the reorganization and restructuring of troubled companies, both out of court and in chapter 11 proceedings. Jefferies has advised debtors, creditor and equity constituencies, and purchasers in

numerous reorganizations in the United States and worldwide. Since 2007, Jefferies has been involved in over 250 restructurings representing more than \$550 billion in restructured liabilities.

7. Jefferies was engaged by the Debtors in June 2020<sup>3</sup> to explore restructuring alternatives. As a result, Jefferies is familiar with the Debtors' corporate and capital structure, management, business operations, and potential investor universe. In addition, Jefferies advised the Debtors prior to the Petition Date regarding certain in- and out-of-court restructuring alternatives, and ultimately advised the Debtors in preparation for these Chapter 11 Cases. Thus, the Debtors believe that Jefferies is both well qualified and uniquely able to advise the Debtors in these Chapter 11 Cases.

8. Jefferies has extensive experience in reorganization cases and has an excellent reputation for services it has rendered in large and complex chapter 11 cases on behalf of debtors, creditors, and creditors' committees throughout the United States. Jefferies has advised on the following chapter 11 cases, among others: *In re Mallinckrodt plc*, Case No. 20-12522 (JTD) (Bankr. D. Del. Jan. 13, 2021); *In re Bouchard Transportation Co., Inc.*, Case No. 20-34682 (DRJ) (Bankr. S.D. Tex. Jan. 14, 2021); *In re Valaris plc*, Case No. 20-34114 (MI) (Bankr. S.D. Tex. Nov. 04, 2020); *In re Foresight Energy LP*, Case No. 20-41308-659 (Bankr. E.D. Mo. Apr. 7, 2020); *In re Melinta Therapeutics, Inc.*, Case No. 19-12748 (LSS) (Bankr. D. Del. Feb. 7, 2020); *In re EP Energy Corp.*, Case No. 19-35654 (MI) (Bankr. S.D. Tex. Jan. 8, 2020); *In re Dura Automotive Systems, LLC*, Case No. 19-12378 (KBO) (Bankr. D. Del. Dec. 3, 2019); *In re Synergy Pharmaceuticals Inc.*, Case No. 18-14010 (JLG) (Bankr. S.D.N.Y. Mar. 7, 2019); *In re Westmoreland Coal Company*, Case No. 18-35672 (DRJ) (Bankr. S.D. Tex. Dec. 6, 2018); *In re Mission Coal Company, LLC*, Case No. 18-04177-TOM11 (Bankr. N.D. Ala. Nov. 30, 2018); *In*

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<sup>3</sup> The Engagement Letter amended and restated a prior letter dated June 12, 2020.

*re Claire's Stores, Inc.* Case No. 18-10584 (MFW) (Bankr. D. Del. Aug. 3, 2018); *In re Gibson Brands, Inc.*, Case No. 18-11025 (CSS) (Bankr. D. Del. June 6, 2018); *In re iHeartMedia*, Case No. 18-31274 (MI) (Bankr. S.D. Tex. May 30, 2018); *In re Armstrong Energy, Inc.*, Case No. 17-47541-659 (Bankr. E.D. Mo. Jan. 16, 2018); *In re Real Industry, Inc.*, Case No. 17-12464 (KJC) (Bankr. D. Del. Dec. 19, 2017); *In re Goodman Networks, Inc.*, Case No. 17-31575 (MI) (Bankr. S.D. Tex. Apr. 20, 2017); *In re BCBG Max Azria Global Holdings, LLC*, Case No. 17-10466 (SCC) (Bankr. S.D.N.Y. Mar. 29, 2017); *In re Peabody Energy Corp.*, Case No. 16-42529 (BSS) (Bankr. E.D. Mo. June 17, 2016); *In re Aspect Software Parent, Inc.*, No. 16-10597 (MFW) (Bankr. D. Del. Apr. 21, 2016); *In re Sundevil Power Holdings, LLC*, No. 16-10369 (KJC) (Bankr. D. Del. Apr. 7, 2016); *In re Arch Coal, Inc.*, Case No. 16-40120 (TFE) (Bankr. E.D. Mo. Mar. 21, 2016); *In re Alpha Natural Res., Inc.*, No. 15-33896 (KRH) (Bankr. E.D. Va. Oct. 16, 2015); *In re Patriot Coal Corp.*, No. 15-32450 (KLP) (Bankr. E.D. Va. July 9, 2015).

### **JEFFERIES' DISINTERESTEDNESS**

9. In connection with its retention by the Debtors, Jefferies undertook to determine whether Jefferies: (a) has any connection with the Debtors, their affiliates, their creditors, or any other parties in interest in these Chapter 11 Cases; or (b) has an interest adverse to the interests of the Debtors' estates or of any class of creditors or equity security holders.

10. To check potential connections with the Debtors and other parties in interest in these Chapter 11 Cases, Jefferies has searched to determine whether it had any relationships with the entities identified by the Debtors and its representatives as potential parties in interest listed on **Schedule 1** hereto (the "**Potential Parties in Interest**"). Specifically, Jefferies entered the names of the Potential Parties in Interest into a database containing the names of Jefferies' current and former investment banking clients. To the extent that this inquiry has revealed that certain

Potential Parties in Interest were current or former investment banking clients of Jefferies within the past three years, these parties have been identified on a list (the “Client Match List”) annexed hereto as **Schedule 2**. Through the information generated from the aforementioned inquiry and through follow-up inquiries to Jefferies professionals responsible for certain clients listed on the Client Match List, Jefferies has determined that its representation of the clients on the Client Match List, if any, concerned matters unrelated to the Debtors. As to the Potential Parties in Interest not identified on the Client Match List, Jefferies has not been employed by or rendered advisory services to any such parties within the past three years.

11. As part of its diverse global activities, Jefferies is involved in numerous cases, proceedings, and transactions involving many different attorneys, accountants, investment bankers, and financial consultants, some of whom may represent claimants and parties in interest in these Chapter 11 Cases. Further, Jefferies has in the past, and may in the future, advise and/or be represented by several attorneys, law firms and other professionals, some of whom may be involved in these Chapter 11 Cases. Finally, Jefferies has in the past, and will likely in the future, be working with or against other professionals involved in these Chapter 11 Cases in matters wholly unrelated to these Chapter 11 Cases. Based upon our current knowledge of the professionals involved in these Chapter 11 Cases, and, to the best of my knowledge, none of these business relationships constitute interests adverse to the interests of the Debtors’ estates or of any class of creditors or equity security holders in matters upon which Jefferies is to be employed, and none are in connection with these Chapter 11 Cases.

12. Jefferies is a global investment banking firm with broad activities covering, in addition to its investment banking and financial advisory practice, trading in equities, convertible securities, and corporate bonds. With more than 80,000 customer accounts and thousands of

relationships and transactions around the world, it is possible that one or more of Jefferies' clients or a counterparty to a securities transaction may hold a claim or interest or otherwise be Potential Parties in Interest in these Chapter 11 Cases and that Jefferies and/or its affiliates may have other business relationships and/or connections with such Potential Parties in Interest. Further, as a major market maker in equity securities as well as a major trader of corporate bonds and convertible securities, including those of creditors or parties in interest in these Chapter 11 Cases, Jefferies regularly enters into securities transactions with other registered broker-dealers as a part of its daily activities. Some of these counterparties may be creditors, equity holders, or other parties in interest in these Chapter 11 Cases. Jefferies believes that none of these business relationships constitute interests adverse to the interests of the Debtors' estates or of any class of creditors or equity security holders in matters upon which Jefferies is to be employed, and none are in connection with these Chapter 11 Cases.

13. In addition, as of the date hereof, Jefferies and its affiliates have thousands of employees worldwide. It is possible that certain of Jefferies' and its affiliates' respective directors, officers and employees may have had in the past, may currently have, or may in the future have connections to (a) the Debtors, (b) the Potential Parties in Interest, and/or (c) funds or other investment vehicles that may own debt or securities of the Debtors or other Potential Parties in Interest. Furthermore, in addition to the parties listed on **Schedule 2**, Jefferies may also represent, or may have represented, affiliates, equity holders, and/or sponsors of the Potential Parties in Interest. Certain of the Potential Parties in Interest may also be vendors or insurers of Jefferies and/or have other non-investment banking relationships with Jefferies. Jefferies may also represent, or may have represented in the past, committees or groups of lenders or creditors in connection with certain restructuring or refinancing engagements, which committees or groups

include, or included, entities that appear on the Potential Parties in Interest list. Jefferies believes that none of these business relationships constitute interests adverse to the interests of the Debtors' estates or of any class of creditors or equity security holders in matters upon which Jefferies is to be employed, and none are in connection with these Chapter 11 Cases.

14. Certain affiliates of Jefferies serve as managers for a number of investment vehicles (collectively, the "Managed Funds"). The Managed Funds are principally intended for investments by third parties unrelated to Jefferies. However, such investors may also include financial institutions (some of which may be parties in interest in these Chapter 11 Cases), affiliates of Jefferies, or their respective officers and employees (some of whom may be Jefferies' employees providing services in connection with these Chapter 11 Cases). Jefferies' employees working in connection with these Chapter 11 Cases have no control over or involvement in investment decisions made for the Managed Funds. With respect to the Managed Funds, Jefferies makes the following additional disclosures:

- (a) Among other things, the Managed Funds are (i) active direct investors in a number of portfolio companies (the "Equity Investments") and (ii) investors in a variety of debt instruments and mezzanine loans or similar securities (the "Income Investments") and, together with the Equity Investments, the "Portfolio Holdings"; and
- (b) The fund managers of the Managed Funds maintain control over investment decisions with respect to the Portfolio Holdings. Many financial institutions and parties in interest who may be involved in these Chapter 11 Cases may also be investors in the Managed Funds. Moreover, the Managed Funds may invest from time to time in Portfolio Holdings relating to the Debtors or parties in interest in these Chapter 11 Cases. In order to comply with securities laws and to avoid any appearance of impropriety, the employees of the Managed Funds are strictly separated from the employees of Jefferies. Jefferies maintains a strict separation between its employees assigned to these Chapter 11 Cases and employees involved in the management of Jefferies' investment banking division, on the one hand, and other employees of Jefferies (e.g., sales and trading employees) and its affiliates (including the employees of the Managed Funds), on the other hand. This separation is maintained through the use of information walls. These information walls include physical and technological barriers, compliance, and surveillance mechanisms, and

policies and procedures designed to prevent confidential information from being shared improperly. Consequently, as no confidential information concerning the Debtors is permitted to be communicated to any persons working for the Managed Funds, Jefferies does not believe that the relationships outlined above constitute interests adverse to the estates or render Jefferies not disinterested in these Chapter 11 Cases.

15. In addition, as part of its regular business operations, Jefferies may trade securities and other instruments of the Debtors on behalf of third parties (some of whom may be parties in interest in these Chapter 11 Cases). Jefferies may also trade securities and other instruments of the Potential Parties in Interest on behalf of itself and/or its affiliates or third parties. Any and all such trading operations and market making activities are separated from Jefferies' investment banking department, and its managing directors and employees (including the investment banking professionals working on these Chapter 11 Cases), by an information barrier, and no Jefferies professionals providing services to the Debtors will be involved with such trading operations and market making activities in any capacity.<sup>4</sup> Jefferies, moreover, shall not own or hold securities of the Debtors on behalf of itself and/or its affiliates while employed by the Debtors.

16. The Debtors have numerous creditors and relationships with a large number of individuals and entities that may be parties in interest in these Chapter 11 Cases. Consequently, although every reasonable effort has been made to discover Jefferies' connections with the Potential Parties in Interest, Jefferies is unable to state with certainty whether any of its clients or an affiliated entity of a client holds a claim or otherwise is a party in interest in these Chapter 11 Cases. If Jefferies discovers any information that is contrary or pertinent to the statements made herein, Jefferies will promptly disclose such information to the Court. Additionally, as noted above, Jefferies is part of a global investment banking firm and thus has several legally separate and

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<sup>4</sup> These information barriers include physical and technological barriers, compliance and surveillance mechanisms and policies and procedures designed to prevent confidential information from being shared improperly.

distinct foreign and domestic affiliates. Although employees of certain affiliates may sometimes assist Jefferies in connection with a restructuring engagement, as Jefferies is the only entity being retained in these Chapter 11 Cases, we have researched only the electronic client files and records of Jefferies, not of all of its affiliates, to determine connections with any Potential Parties in Interest.

17. Jefferies does not advise, has not advised, and will not advise any entity other than the Debtors in matters related to these Chapter 11 Cases. Jefferies will, however, continue to provide professional services to entities or persons that may be creditors of the Debtors or parties in interest in these Chapter 11 Cases, provided that such services do not relate to, or have any direct connection with, these Chapter 11 Cases or the Debtors.

18. Except as otherwise set forth herein, to the best of my knowledge, information, and belief, Jefferies: (a) is not a creditor, equity security holder, or an insider of the Debtors; and (b) was not, within two years before the Petition Date, a director, officer, or employee of any of the Debtors. In addition, none of the Jefferies' professionals expected to assist the Debtors in these Chapter 11 Cases are related or connected to any United States Bankruptcy Judge for the District of Delaware, the U.S. Trustee, or any person employed by the U.S. Trustee.

#### **PROFESSIONAL COMPENSATION**

19. During the 90-day period prior to the commencement of these Chapter 11 Cases, Jefferies was paid in the ordinary course certain fees and expense reimbursements. Specifically, (i) on March 5, 2021 Jefferies was paid \$150,000 on account of its February Monthly Fee, (ii) on April 4, 2021 Jefferies was paid \$150,748.43 on account of its March Monthly Fee and related expense reimbursements, (iii) on April 15, 2021 Jefferies was paid \$150,342.35 on account of its

April Monthly Fee and related expense reimbursements, and (iv) on May 4, 2021 Jefferies was paid \$160,063.22 on account of its May Monthly Fee and related expense reimbursements.

20. The Fee and Expense Structure set forth in the Application is consistent with Jefferies' typical fee for work of this nature. The fees are set at a level designed to compensate Jefferies fairly for the work of its professionals and assistants and to cover fixed and routine overhead expenses. It is Jefferies' policy to charge its clients for all disbursements and expenses incurred in the rendition of services.

21. It is not the general practice of investment banking firms to keep detailed time records similar to those customarily kept by attorneys. Jefferies' restructuring professionals, when formally retained in chapter 11 cases, and when required by local rules, do, and in these Chapter 11 Cases will, keep time records in half-hour increments describing their daily activities and the identity of persons who performed such tasks. Jefferies will also supplement this information with a list of the non-restructuring professionals who assist the restructuring department on this matter but who do not, as a matter of general practice, keep records in the same manner.

22. The Fee and Expense Structure is comparable to those generally charged by investment banking firms of similar stature to Jefferies and for comparable engagements, both in and out of court, and reflect a balance between a fixed, monthly fee, and a contingency amount which are tied to the consummation and closing of a transaction as contemplated in the Engagement Letter.

23. The Engagement Letter was negotiated at arm's length and in good faith, and I believe that the provisions contained therein are reasonable terms and conditions of Jefferies' employment by the Debtors. With respect to the Engagement Letter's indemnification provisions, unlike the market for other professionals that a debtor or committee may retain, indemnification is

a standard term of the market for investment bankers. The indemnity, moreover, is comparable to those generally obtained by investment banking firms of similar stature to Jefferies and for comparable engagements, both in and out of court.

24. Other than as set forth above and in the Engagement Letter, there is no proposed arrangement between the Debtors and Jefferies for compensation to be paid in these Chapter 11 Cases. Jefferies has no agreement with any other entity to share any compensation received, nor will any be made, except as permitted under section 504(b)(1) of the Bankruptcy Code.

25. The foregoing constitutes the statement of Jefferies pursuant to section 504 of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 5002.

*[Remainder of page intentionally left blank]*

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 20, 2021

Respectfully submitted,

/s/ Robert White

Robert White  
Managing Director  
Jefferies LLC

**Schedule 1**

**Potential Parties in Interest**

**Debtors and Trade Names**

HOSPITALITY INVESTORS TRUST, INC.  
F/K/A AMERICAN REALTY CAPITAL HOSPITALITY TRUST, INC.  
HOSPITALITY INVESTORS TRUST OPERATING PARTNERSHIP, L.P.  
F/K/A AMERICAN REALTY CAPITAL HOSPITALITY OPERATING  
PARTNERSHIP, L.P.

**Non-Debtor Subsidiaries and Affiliates**

HIT SWN OWNER HOLDCO, LLC  
HIT PORTFOLIO NBL, LLC  
HIT NBL NTC OWNER GP, LLC  
HIT NBL HYP SCHIL OWNER, LLC  
HIT SWN TRS HOLDING, LLC  
HIT SWN TRS, LLC  
HIT NBL CY CBSOH OWNER, LLC  
HIT NBL NTC OWNER GP, LLC  
HIT NBL HH ATLGA OWNER, LLC  
HIT NBL MNTCA001 OWNER, LP  
HIT SWN CRS NTC TRS GP, LLC  
HIT SWN CRS NTC TRS, LP

**Cash Management Bank**

WELLS FARGO

**Case Professionals**

EPIQ BANKRUPTCY SOLUTIONS, LLC  
POTTER ANDERSON & CORROON, LLP  
PRICEWATERHOUSECOOPERS INC.  
KPMG INTERNATIONAL LIMITED  
JEFFERIES GROUP, LLC  
CLEARY GOTTLIEB STEEN & HAMILTON, LLP  
MORRISON & FOERSTER, LLP  
YOUNG CONAWAY STARGATT & TAYLOR, LLP

**Current and Former Directors and Officers of the Debtor**

JONATHAN MEHLMAN  
BRUCE RIGGINS  
PAUL C. HUGHES  
STANLEY R. PERLA  
ABBY M. WENZEL  
STEPHEN P. JOYCE  
EDWARD A. GLICKMAN  
LOWELL G. BARON  
BRUCE G. WILES

**Current Officer Employees**

AMI BABLA  
SITSOFE BAETA  
AARON DEYERLE  
BRIAN DOOLEY  
MATTHEW FEINBERG  
KELLY REYES  
JAMES SHERRON  
YAXI ZHOU  
TIM BOWES  
JODIE CHENG  
KYUNGMIN CHO  
MARK FOWLER  
KERI KOEHLER  
CHRIS LOHMEIER  
PAUL REYNOLDS  
MARTIN SEANOR  
MICHAEL STEIN  
ANDREW TREVENEN  
VANESSA ROMEU  
TARA KEATING BROOKS

**Governmental and Regulatory Agencies**

INTERNAL REVENUE SERVICES (IRS)  
UNITED STATES SECURITIES AND EXCHANGE COMMISSION (SEC)

**Insurers and Issuers of Surety Bonds**

BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY  
ALLIANZ GLOBAL RISKS US INSURANCE COMPANY  
CONTINENTAL CASUALTY COMPANY  
RSUI INDEMNITY COMPANY  
CAPITOL SPECIALTY INSURANCE CORPORATION  
HUDSON INSURANCE COMPANY  
FEDERAL INSURANCE COMPANY  
LLOYD'S OF LONDON  
INDEMNITY INSURANCE COMPANY OF NORTH AMERICA  
ACE PROPERTY AND CASUALTY INSURANCE COMPANY  
MARKEL INSURANCE COMPANY  
GEMINI INSURANCE COMPANY  
ASSOCIATED INDUSTRIES INSURANCE CO, INC.  
COLUMBIA CASUALTY COMPANY  
ENDURANCE RISK SOLUTIONS ASSURANCE CO.  
ARGONAUT INSURANCE COMPANY  
XL SPECIALTY INSURANCE COMPANY  
US SPECIALTY INSURANCE COMPANY  
BEAZLEY GROUP

ACE AMERICAN INSURANCE COMPANY  
MARSH USA INC.

LIBERTY MUTUAL INSURANCE COMPANY  
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA  
HARTFORD FIRE INSURANCE COMPANY

**Judges of the United States Bankruptcy Court for the District of Delaware**

CHIEF JUDGE CHRISTOPHER S. SONTCHI  
JUDGE JOHN T. DORSEY  
JUDGE KAREN B. OWENS  
JUDGE BRENDAN L. SHANNON  
JUDGE LAURIE SELBER SILVERSTEIN  
JUDGE MARY F. WALRATH  
JUDGE ASHLEY M. CHAN  
JUDGE J. KATE STICKLES  
JUDGE CRAIG T. GOLDBLATT

**Landlords**

FIFTH STREET HOTEL, LLC  
ISTAR DALLAS GL, LP  
S&S ASSOCIATES LLC  
NEW OWNERS VESTAVIA LLC  
GOVERNOR PLAZA ASSOCIATES  
GLENWOOD SQUARE SHOPPING CENTER ASSOCIATES, LLC  
VIRGINIA TECH FOUNDATION, INC.  
BRE PARK AVENUE TOWER OWNER, LLC

**Lenders**

MORGAN STANLEY BANK, N.A.  
CITI REAL ESTATE FUNDING INC.  
DEUTSCHE BANK AG, NEW YORK BRANCH  
GOLDMAN SACHS MORTGAGE COMPANY  
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION  
MORGAN STANLEY MORTGAGE CAPITAL HOLDINGS LLC  
CITIGROUP GLOBAL MARKETS REALTY CORP  
LADDER CAPITAL FINANCE LLC  
GERMAN AMERICAN CAPITAL CORPORATION  
CITIBANK, N.A.  
BBVA USA  
CTBC BANK CO., LTD., NEW YORK BRANCH  
WILMINGTON TRUST, NATIONAL ASSOCIATION  
US BANK NATIONAL ASSOCIATION  
NONGHYUP BANK  
CC6 INVESTMENTS LTD  
NC GARNET FUND, L.P.  
GOLDMAN SACHS BANK USA

**Litigation Parties**

ROBERT CARL DAVIS  
ROSE M. JONES  
CARL SCOTT SCHULER  
ASHLEA BRANDON

**Major Benefits Providers**

INSPERITY PEO SERVICES, L.P.

**Office of the United States Trustee**

LAUREN ATTIX  
DAVID BUCHBINDER  
LINDA CASEY  
DENIS COOKE  
JOSEPH CUDIA  
HOLLY DICE  
SHAKIMA L. DORTCH  
TIMOTHY J. FOX, JR.  
DIANE GIORDANO  
CHRISTINE GREEN  
BENJAMIN HACKMAN  
RAMONA HARRIS  
NYANQUOI JONES  
JANE LEAMY  
HANNAH M. MCCOLLUM  
JOSEPH MCMAHON  
JAMES R. O'MALLEY  
MICHAEL PANACIO  
LINDA RICHENDERFER  
JULIET SARKESSIAN  
RICHARD SCHEPACARTER  
EDITH A. SERRANO  
ROSA SIERRA  
KAREN STARR  
T. PATRICK TINKER  
DAVID VILLAGRANA  
DION WYNN

**Other Potential Parties in Interest**

HILTON HOTELS CORP.  
MARRIOTT INTERNATIONAL INC.  
HYATT HOTELS CORP.  
MCKIBBON HOTEL MANAGEMENT, INC.  
HAMPTON INNS MANAGEMENT LLC  
HOMEWOOD SUITES MANAGEMENT LLC  
INNVENTURES IVI, LP

CRESTLINE HOTELS & RESORTS

**Plan Sponsor**

BROOKFIELD STRATEGIC REAL ESTATE PARTNERS II HOSPITALITY REIT  
II LLC  
BSREP II HOSPITALITY II SPECIAL GP OP LLC

**Potential Creditors**

ADAM'S COOLING INC.  
ALL FLORIDA MECHANICAL SERVICES, INC.  
ARENT FOX LLP  
AMERICAN RENOVATIONS OF INDIANA  
BELFOR USA GROUP  
CAPITAL CITY LINENS  
CONTINENTAL GIRBAU INC.  
DBS ASSOCIATES, INC.  
DESIGN ONE STUDIO LLC  
NATIONAL SECURITIES CLEARING CORPORATION  
ED'S SUPPLY COMPANY, INC.  
ELDRIDGE SERVICES, INC.  
HD SUPPLY FACILITIES MAINTENANCE, LTD  
HEAD HEATING AND AIR CONDITIONING LLC  
HOMESITE INSURANCE COMPANY  
INSIGHT DIRECT USA, INC.  
JARVIO PLASTERING, INC.  
JOHNSON CONTROLS FIRE PROTECTION LP  
M3 MECHANICAL, INC.  
MPH  
MEDIA TEMPLE, INC.  
NATIONAL AIR CORP.  
PRINTSCAN LLC  
RENOVIA  
REACT MOBILE, INC.  
ROSE PAVING COMPANY  
RUTLEDGE ECENIA, P.A.  
SCOTT EQUIPMENT LLC  
SHERWIN-WILLIAMS CO.  
SPINZONE LAUNDRY  
THYSSENKRUPP ELEVATOR CORPORATION  
TEBARCO MECHANICAL CORPORATION  
TOPE'S TREE SERVICE, INC.  
ASSA ABLOY HOSPITALITY, INC.  
WICOX & SAVAGE, P.C.  
WHEELER MECHANICAL SERVICES, LLC

**Taxing Authorities**

INTERNAL REVENUE SERVICE  
ALABAMA DEPARTMENT OF REVENUE  
ARIZONA DEPARTMENT OF REVENUE  
GEORGIA DEPARTMENT OF REVENUE  
MINNESOTA DEPARTMENT OF REVENUE  
NEW MEXICO TAXATION AND REVENUE DEPARTMENT  
OREGON DEPARTMENT OF REVENUE  
SOUTH CAROLINA DEPARTMENT OF REVENUE  
RHODE ISLAND DIVISION OF TAXATION  
INDIANA DEPARTMENT OF REVENUE  
OHIO DEPARTMENT OF TAXATION  
NEW YORK DEPARTMENT OF TAXATION AND FINANCE  
KENTUCKY DEPARTMENT OF REVENUE  
CALIFORNIA FRANCHISE TAX BOARD  
NEW MEXICO TAXATION AND REVENUE DEPARTMENT  
IDAHO STATE TAX COMMISSION  
LOUISIANA DEPARTMENT OF REVENUE  
MASSACHUSETTS DEPARTMENT OF REVENUE  
MARYLAND COMPTROLLER  
DELAWARE DEPARTMENT OF FINANCE  
NORTH CAROLINA DEPARTMENT OF REVENUE  
TENNESSEE DEPARTMENT OF REVENUE  
TEXAS COMPTROLLER

**Top 20 Creditors**

ALBUQUERQUE PLUMBING HEATING & COOLING, INC  
ARCTIC ENGINEERING CO., INC.  
CAPITOL DOCUMENT SOLUTIONS LLC  
DALTON SERVICE, INC.  
FRIEDRICH AIR CONDITIONING CO. LTD  
HUNTON ANDREWS KURTH LLP  
KEITH LAWSON SERVICES, LLC  
LG FULFILLMENT- PONTE VEDRA BEACH FLORIDA  
LEGACY HEATING & AIR CONDITIONING  
MARYLAND MECHANICAL SYSTEMS INC.  
POWER OUTAGE SERVICES COMPANY, LLC  
PEACH STATE ROOFING, INC.  
GUEST SUPPLY LLC

**Utility Providers**

ATLANTECH ONLINE, INC.  
TIME WARNER CABLE ENTERPRISE, LLC  
COGENT COMMUNICATIONS, INC.  
FUSION CLOUD COMPANY, LLC

**Schedule 2**

**Client Match List**

Citigroup  
Deutsche Beteiligungs AG  
Goldman Sachs Merchant Banking  
Goldman Sachs  
Hilton Grand Vacations, Inc.  
Brookfield Asset Management