

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF KENTUCKY**

In re:)	
)	Chapter 11
)	
Cambrian Holding Company, Inc., <i>et al.</i> ,)	Case No. 19-51200 (GRS)
)	
Debtors.)	(Jointly Administered)
)	
)	Honorable Gregory R. Schaaf
)	

RULE 2019 NOTICE OF MULTIPLE REPRESENTATION

Walther, Gay & Mack, PLC (“WGM”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, gives notice¹ that it has been engaged to represent the following creditors in relation to the captioned Chapter 11 case, as follows:

1. WGM, by and through Jonathan L. Gay, and Stephen Barnes, have been engaged herein to represent Kentucky Coal Employers’ Self-Insurance Guaranty Fund (“Kentucky Coal”), P.O. Box 910623, Lexington KY 40591. Kentucky Coal has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. Kentucky Coal asserts claims against the Debtors, which are filed of public record.

2. WGM, by and through Stephen Barnes, have been engaged to represent Meritain Health, Inc. (“Meritain”), c/o Hon. Payam Khodadadi, McGuireWoods, LLP, 1800 Century Park East, 8th Floor, Los Angeles, California 90067. Meritain has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. Meritain is the target of a

¹ - Bankruptcy Rule 2019 requires disclosure when a “group” represents multiple creditors “acting in concert to advance their common interests[.]” FRBP 2019(b)(1). The creditors represented by WGM are not acting in concert to advance their common interests and accordingly WGM does not believe that Rule 2019 requires disclosure. Nevertheless, out of an abundance of caution WGM has disclosed the representation.

preferential transfer demand and asserts claims against the Debtors, which are filed of public record.

3. WGM, by and through Stephen Barnes, have been engaged to represent River Rose, LLC (“River Rose”), c/o William Griffith, 397 Little Card Road, Mouthcard, Kentucky 41548. River Rose has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. River Rose is the target of a preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

4. WGM, by and through Stephen Barnes, Esq., have been engaged to represent SPK Enterprises, Inc. (“SPK”), c/o Stanley Belcher, P. O. Box 4320, Pikeville, Kentucky 41502. SPK has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. SPK is the target of a preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

5. WGM, by and through Stephen Barnes, Esq., have been engaged to represent Woodman Three Mine, Inc. (“Woodman”), c/o John Freeman, 2412 Feds Creek Road, Steele, Kentucky 41566. Woodman has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. Woodman is the target of a preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

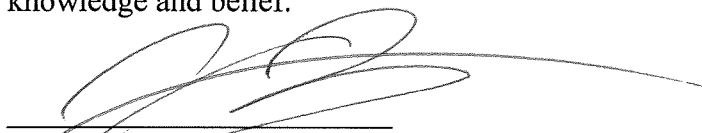
6. WGM, by and through Stephen Barnes, Esq., have been engaged to represent Black Pearl Mining, Inc. (“Black Pearl”), c/o Ricky Lucas, 14551 Elkhorn Gap Road, Shelby Gap, Kentucky 41563. Black Pearl has been advised of, and consented to, WGM’s representation of multiple entities in this Bankruptcy case. Black Pearl is the target of a

preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

7. WGM, by and through Stephen Barnes, Esq., have been engaged to represent Maggard Sales & Service, Inc. ("Maggard"), c/o Archie K. Maggard, 7915 South Fork Road, Pound, Virginia 24279. Maggard has been advised of, and consented to, WGM's representation of multiple entities in this Bankruptcy case. Maggard is the target of a preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

8. WGM, by and through Stephen Barnes, have been engaged to represent KP Trucking, LLC ("KP Trucking"), c/o Tina Prater, 337 Right Fork of Greasy Creek, Shelbyana, Kentucky 41562. KP Trucking has been advised of, and consented to, WGM's representation of multiple entities in this Bankruptcy case. KP Trucking is the target of a preferential transfer demand and may assert claims against the Debtors, which are filed of public record to the extent such claims exist.

9. The undersigned verifies that the foregoing is true and correct to the best of his knowledge and belief.



STEPHEN BARNES

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

The foregoing document was acknowledged, subscribed, and sworn to before me this 3rd day of August, 2021, by Stephen Barnes.

DIANE M. CHARLES

NOTARY PUBLIC

ID # 602213

Commonwealth of Kentucky

My Commission Expires June 28, 2022

Diane M. Charles
NOTARY PUBLIC
STATE AT LARGE, KENTUCKY

My commission expires: 6-28-2022

Respectfully submitted,

Dated: August 3, 2021

/s/ Stephen Barnes

Stephen Barnes, Attorney

KY Bar ID No.: 89762

Walther Gay & Mack PLC

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COUNSEL FOR KENTUCKY COAL

EMPLOYERS' SELF-INSURANCE

GUARANTY FUND, MERITAIN

HEALTH, INC., RIVER ROSE, LLC,

SPK ENTERPRISES, INC., WOODMAN THREE

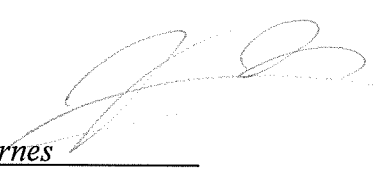
MINE, INC., BLACK PEARL MINING, INC.,

MAGGARD SALES & SERVICE, INC., and KP

TRUCKING, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2021, a true and correct copy of the foregoing was served electronically through the Court's ECF system upon all Filing Users accepting Notice of Electronic Filing.


/s/ Stephen Barnes

COUNSEL FOR KENTUCKY COAL
EMPLOYERS' SELF-INSURANCE
GUARANTY FUND, MERITAIN
HEALTH, INC., RIVER ROSE, LLC,
SPK ENTERPRISES, INC., WOODMAN THREE
MINE, INC., BLACK PEARL MINING, INC.,
MAGGARD SALES & SERVICE, INC., and KP
TRUCKING, LLC