

ENTERED

September 07, 2021

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: EPIC COMPANIES, LLC, Debtors.¹	§ § Chapter 11 § § Case No. 19-34752 § § (Jointly Administered) §
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**STIPULATION AND AGREED ORDER RESOLVING LIQUIDATING
TRUSTEE’S OBJECTION TO CLAIM NO. 250 FILED
BY MARITIME AND TRANSPORT SERVICES LTD.
[Relates to Docket No. 811 and 884]**

Jeffrey T. Varsalone, in his capacity as the Liquidating Trustee for the Epic Companies, LLC Trust and Maritime and Transport Services Ltd (the “Claimant”, and collectively with the Liquidating Trustee, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, on August 26, 2019 (the “Petition Date”), Epic Companies, LLC (“Epic”) and certain of its subsidiaries (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”).

WHEREAS, on October 3, 2019, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, including Requests for Payment under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates* [Docket No. 226], which established

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Epic Companies, LLC (1473), Epic Diving & Marine Services, LLC (2501), Epic Applied Technologies, LLC (5844), Epic Specialty Services, LLC (8547), Epic Alabama Steel, LLC (6835), Epic San Francisco Shipyard, LLC (5763) and Zuma Rock Energy Services, LLC (1022). The mailing address of the Debtors is: P.O. Box 79625, Houston, Texas 77279-9625.

November 6, 2019 as the general claims bar date and February 24, 2020 as the governmental bar date.

WHEREAS, on February 13, 2020, the Debtors filed the *Joint Plan of Liquidating of Epic Companies, LLC and its Debtor Subsidiaries under Chapter 11 of the Bankruptcy Code* [Docket No. 581] (the “Plan”).

WHEREAS, on April 8, 2020, the Court confirmed the Plan.

WHEREAS, on April 13, 2020, the Effective Date of the Plan occurred.

WHEREAS, under the Plan, the Liquidating Trustee was appointed and is vested with, among other things, the authority and duty to resolve the claims against the Debtors.

WHEREAS, on November 7, 2019, the Claimant filed Claim No. 250 (the “Claim”) against Epic Companies, LLC (“Epic”) asserting an unsecured claim for \$1,002,439.94 for outstanding balances related to services performed, port charges, and reimbursable expenses under various contracts between the Claimant and Ranger Offshore, Inc. (“Ranger”).

WHEREAS, on April 19, 2021, the Liquidating Trustee filed his *Objection to Claim No. 250 Filed by Maritime and Transport Services Ltd.* [Docket No. 811] (the “Objection”).

WHEREAS, on May 19, 2021, the Parties entered into a stipulation [Docket No. 832] extending the Claimant’s deadline to respond to the Objection through and including June 19, 2021.

WHEREAS, on June 21, 2021, the Parties entered into a stipulation [Docket No. 871] extending the Claimant’s deadline to respond to the Objection through and including June 25, 2021.

WHEREAS, the Parties agree that to resolve the Objection, the Claimant shall have one allowed general unsecured claim in the amount of \$652,033.31 against Epic, and the Claimant agrees to waive any other claims that it had, has, or may have against the Debtors.

Accordingly, it is hereby STIPULATED, AGREED, and ORDERED that:

1. The Claimant shall have one allowed Class 5 General Unsecured Claim in the amount of \$652,033.31 against Epic (the “Allowed Claim”).

2. Except for the Allowed Claim, all other claims that the Claimant had, has, or may have against the Debtors are disallowed with prejudice.

3. This Stipulation and Agreed Order constitutes the entire agreement between the Parties with respect to the subject matter hereof and supersedes all prior discussions, agreements, and understandings, both written and oral, among the Parties with respect thereto.

4. This Stipulation and Agreed Order shall be binding upon the Parties’ successors, agents, assigns, including bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.

5. The undersigned represent that they are authorized to execute this Stipulation on behalf of the representative party for whom they have signed.

6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation and Agreed Order, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation and Agreed Order.

STIPULATED AND AGREED TO BY:

<p>PORTER HEDGES LLP</p> <p>By: <u>/s/ M. Shane Johnson</u> John F. Higgins (TX 09597500) Eric M. English (TX 24062714) M. Shane Johnson (TX 24083263) 1000 Main Street, 36th Floor Houston, Texas 77002 Telephone: (713) 226-6000 Fax: (713) 226-6248</p> <p>COUNSEL FOR LIQUIDATING TRUSTEE</p>	<p>MARITIME AND TRANSPORT SERVICES LTD.</p> <p>By: <u>/s/ David W. Parham</u> Akerman LLP David W. Parham 2001 Ross Avenue Suite 3600 Dallas, Texas 75201 Telephone: (214) 720-4300 Fax: (214) 981-9339</p> <p>MARITIME AND TRANSPORT SERVICES LTD.</p>
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IT IS SO ORDERED.

Signed: September 07, 2021.



DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court
Southern District of Texas

In re:
Epic Companies, LLC
Epic Alabama Steel, LLC
Debtors

Case No. 19-34752-drj
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Sep 07, 2021

User: ADIuser
Form ID: pdf002

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Total Noticed: 42

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 09, 2021:

Recip ID	Recipient Name and Address
db	+ Epic Alabama Steel, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Epic Applied Technologies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Epic Companies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Epic Diving & Marine Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Epic San Francisco Shipyard, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Epic Specialty Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
db	+ Zuma Rock Energy Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
aty	+ Andrew V. Tenzer, PaulHastings, LLP, 600 Travis Street, 58th Floor, Houston, TX 77002-3009
aty	+ David L Bateman, Bateman Law Firm, 6700 Jefferson Hwy, Bldg 3, Baton Rouge, LA 70806-8287
aty	+ Michael S Waskiewicz, Burr Forman LLP, 50 N Laura Street, Ste 3000, Jacksonville, FL 32202-3658
cr	+ Abe's Boat Rentals, Inc., Wilbur J. Babin, Jr., Bankruptcy Trustee, 3027 Ridgelake Dr, Metairie, LA 70002-4924
intp	+ Alliance Offshore, LLC, c/o David F. Waguespack, 1100 Poydras Street, Suite 3100, New Orleans, LA 70163 USE 70163-1102
cr	+ American Longshore Mutual Association, Ltd. throug, c/o Leann O. Moses, 1100 Poydras Street, Suite 3100, New Orleans, LA 70163-1102
cr	+ Brian M. Jackson, 8 Tanager Trail, The Woodlands, TX 77381-3121
cr	+ Chalos & Co, P.C., Chalos & Co, P.C., 7210 Tickner Street, Houston, TX 77055, UNITED STATES 77055-6935
cr	##+ David Wright, 28019 Buena Way, Spring, Tx 77386-2819
cr	+ Deep Delta, LLC, Timothy Thriffiley, P.O. Box 7125, Belle Chasse, LA 70037-7125
intp	+ Fairways Offshore Exploration, Inc., c/o McDowell Hetherington LLP, Attention: Jarrod B. Martin, 1001 Fannin, Suite 2700, Houston, TX 77002-6774
cr	+ Forum US, Inc., c/o Bradley Arant Boulton Cummings, LLP, Attn: Chris Glenos, 1819 5th Avenue North, Birmingham, AL 35203-2119
cr	+ Frederick J. Guidry, c/o Jason Welborn, P. O. Box 2053, Lafayette, LA 70502-2053
cr	+ Greene's Energy Group, LLC, 440 Louisiana, Suite 718, Houston, TX 77002, UNITED STATES 77002-1058
cr	+ Gulf Oceanic Marine Contractors, Inc., P.O. Box 99, Bourg, LA 70343-0099
cr	+ Louisiana Department of Revenue, Senior Bankruptcy Counsel, Litigation, 617 N. Third Street, Office 780, P O Box 4064 (Zip 70821-4064), Baton Rouge, LA 70802 UNITED STATES OF AMERICA 70821-4064
cr	+ McMoran Oil & Gas, LLC, Locke Lord LLP, Omer F. Kuebel, III, Bradley C. Knapp, 601 Poydras St., Suite 2660 New Orleans, LA 70130-6032
cr	+ New Industries, LLC, c/o Barnet B. Skelton, Jr., 815 Walker, Suite 1502, Houston, TX 77002-5832
intp	+ Offshore Domestic Group, LLC, c/o McDowell Hetherington LLP, Attention: Jarrod B. Martin, 1001 Fannin, Suite 2700, Houston, TX 77002-6774
cr	+ Offshore Express, Inc., C/O Jarrod Martin, 1200 Smith Street, Suite 1400, Houston, TX 77002-4496
intp	+ Offshore Express, LLC, c/o McDowell Hetherington LLP, Attention: Jarrod B. Martin, 1001 Fannin, Suite 2700, Houston, TX 77002-6774
cr	+ Offshore Technical Solutions, LLC, 690 S. Hollywood Rd, Houma, LA 70360-3226
cr	+ RTD Services, c/o David K. Bissinger, Bissinger, Oshman & Williams LLP, 2229 San Felipe, Suite 1500, Houston, TX 77019-5648
cr	+ Taylors International Services, Inc., C/O Stephen C. Jackson, 1901 6th Ave North, 2400 Regions/Harbert Plaza, Birmingham, AL 35203
cr	+ Texas Comptroller of Public Accounts, Christopher S. Murphy, c/o Sherri K. Simpson, Paralegal, P.O. Box 12548, Austin, TX 78711-2548
intp	+ Triton Heavy Lift Services, LLC, c/o David F. Waguespack, 1100 Poydras Street, Suite 3100, New Orleans, LA 70163-1102
intp	+ White Oak Global Advisors, LLC, PaulHastings, LLP, c/o Peter S. Burke, 515 South Flower Street, 25th Floor Los Angeles, CA 90071-2228
cr	+ Williams Field Services-Gulf Coast Company, L.P., c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200 Tulsa, OK 74103-3705
cr	+ Wilson Heavy Industry Co. Ltd., 2925 Briarpark Dr., Suite 675, Houston, TX 77042-3781

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cr + Wright's Well Control Services LLC, 28019 Buena Way, Spring, Tx 77386-2819

TOTAL: 37

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/Text: c.rodrique@bluewaterrubber.com	Sep 07 2021 21:03:00	Bluewater Rubber & Gasket Company, 1119 Barrow Street, P O Drawer 190, Houma, LA 70361-0190
cr	Email/Text: david.cedro@danos.com	Sep 07 2021 21:02:00	Danos, L.L.C., 3878 West Main Street, Gray, LA 70359
cr	Email/Text: controller@dhdoffshore.com	Sep 07 2021 21:02:00	DHD Offshore Services, LLC, 7889 Hwy 182 E, Morgan City, LA 70380
cr	Email/Text: houston_bankruptcy@LGBS.com	Sep 07 2021 21:03:00	Harris County, Linebarger Goggan Blair & Sampson LLP, C/O John P. Dillman, PO Box 3064, Houston, TX 77253-3064
cr	Email/Text: BANKRUPTCY@DOR.MS.GOV	Sep 07 2021 21:03:00	MISSISSIPPI DEPARTMENT OF REVENUE, P. O. BOX 22808, JACKSON, MS 39225-2808

TOTAL: 5

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Lugenbuhl, Wheaton, Peck, Rankin & Hubbard
aty		Norton Rose Fulbright US LLP
cr		Acadiana Rubber & Gasket Co.
cr		Acqua Liana Capital Partners, LLC
cr		Aqueos Corporation
cr		Austin Waterman
cr		Bay Point Capital Partners II, LP
cr		Blue Cross Blue Shield of Texas, a Division of Hea
cr		Bollinger Fourchon, LLC
cr		Bordelon Marine, LLC
cr		Candy Apple, LLC
cr		Curtin Maritime Corporation
cr		Cypress Energy Partners L.P.
cr		Dan Bunkering (America) Inc.
cr		Echo Offshore, LLC
cr		Entier USA Inc.
op		Epiq Corporate Restructuring, LLC
cr		Express Supply and Steel, LLC
cr		Freeport-McMoRan Oil & Gas LLC
cr		Fugro USA Marine, Inc.
cr		Garber Bros, Inc.
cr		Goliath Offshore Holdings PTE.LTD, in pesonam
cr		Gulf Coast Manufacturing, LLC
op		Hilco Industrial, LLC
app		Hilco Valuation Services, LLC
cr		ITC Global, Inc.
cr		Industrial Diesel Services, Inc.
cr		Integra Services Technologies Inc
op		Jeffrey T. Varsalone, Liquidating Trustee
cr		M/V Nor Goliath, in rem
cr		MARMAC LLC
cr		MM Industrial Fabrication, LLC
cr		Medsafe, Inc. and W. Joe Shaw, Ltd.
intp		Modern American Recycling Service, Inc.

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intp		Mule Services, LLC
cr		National Oilwell Varco, L.P. d/b/a NOV Quality Tub
cr		Oceanwide Cypress Ltd.
cr		Oceanwide Netherlands BV
cr		Oceanwide Texas, Inc.
cr		Stephanie Daniels
cr		Stern Offshore, B.V.
cr		The Official Committee of Unsecured Creditors
intp		The Ultimate Software Group Inc.
cr		United States of America
intp		Vertex Services, LLC
cr		Work Boat Electric Services, Inc.
cd	*+	Epic Applied Technologies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
cd	*+	Epic Companies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583
cc	*+	Wright's Well Control Services LLC, 28019 Buena Way, Spring, Tx 77386-2819
aty	##+	Nicholas A Bassett, Paul Hastings LLP, 875 15th Street, N.W., Washington, DC 20005-2258
intp	##+	Arena Offshore LP, Arena Offshore LP, 4200 Research Forest Drive, Suite 500, The Woodlands, TX 77381, UNITED STATES 77381-4224
cr	##+	Javeler Marine Services LLC, P.O. Box 137, Delcambre, LA 70528-0137

TOTAL: 46 Undeliverable, 3 Duplicate, 3 Out of date forwarding address

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 09, 2021

Signature: /s/Joseph Speetjens