

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

In re:)	Chapter 11
)	
CSH WINDDOWN, INC., et al.,)	Case No. 18-11272 (LSS)
)	
Debtors.)	

**CERTIFICATE OF COUNSEL REGARDING REVISED ORDER
GRANTING THE WIND-DOWN ADMINISTRATOR’S MOTION TO ADDRESS
UNLIQUIDATED SECURED CLAIMS OF CERTAIN INSURANCE COMPANIES**

The undersigned counsel to Beane Associates, Inc. (the “Wind-Down Administrator”), the wind-down administrator appointed in the above-captioned chapter 11 cases filed by the above-captioned debtors (collectively, the “Debtors”) pursuant to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation Proposed by the Debtors [D.I. 479] (the “Plan”), hereby certifies as follows:

1. On August 30, 2021, the Wind-Down Administrator filed the *Wind-Down Administrator’s Motion to Address Unliquidated Secured Claims of Certain Insurance Companies* (the “Insurance Motion”) [D.I. 819].

2. On September 17, 2021, a hearing was held to consider the Insurance Motion. During the hearing, the Court expressed concerns about paragraph 6 of the order accompanying the Insurance Motion, specifically regarding whether currently known secured, priority or administrative expense claims were adequately reserved for.

3. After extensive discussions, the parties to the Insurance Motion, namely the Wind-Down Administrator, Wells Fargo and the Insurance Companies, have agreed on a revised form of order (the “Revised Proposed Order”) which, the parties believe, appropriately addresses the Court’s concerns.

4. Attached as Exhibit A is the Revised Proposed Order, and as Exhibit B is a redline of the Revised Proposed Order, highlighted against the original proposed form of order.

WHEREFORE, on behalf of the Wind-Down Administrator, the undersigned respectfully request that the Court enter the Revised Proposed Order for the Insurance Motion at its earliest convenience.

Respectfully Submitted,

**McELROY, DEUTSCH MULVANEY &
CARPENTER LLP**

Dated: October 7, 2021

/s/ David P. Primack

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Administrator*