

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

In re:

MEA RemainCo Holdings, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-12088 (MFW)

(Jointly Administered)

Re: Docket Nos. 559, 560, 563, 564 & 565

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER
AWARDING FINAL ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES**

The undersigned hereby certifies as follows:

1. On September 2, 2021 and September 3, 2021, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals*, entered October 13, 2020 [Docket No. 109] and the *Order (I) Approving the Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation on a Final Basis and (II) Confirming the Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation*, entered June 28, 2021 [Docket No. 508], McDermott Will & Emery LLP, BDO Consulting Group LLC, a Division of BDO USA, LLP, Epiq Corporate Restructuring, LLC, Akin Gump Strauss Hauer & Feld LLP, and Richards, Layton & Finger, P.A. (each, an “**Applicant**” and collectively, the “**Applicants**”) filed their final fee applications [Docket Nos. 559, 560, 563, 564

¹ The Debtors, together with the last four digits of each Debtor's federal tax identification number, are MEA RemainCo Holdings, LLC (f/k/a Energy Alloys Holdings, LLC) (4144); MEA RemainCo, L.L.C. (f/k/a Energy Alloys, L.L.C.) (0377); MEA RemainCo Louisiana, LLC (f/k/a/ Energy Alloys Louisiana, LLC) (0623); MEA RemainCo Canada Holding, L.L.C. (f/k/a Energy Alloys Canada Holding, L.L.C.) (0382); MEA RemainCo Services, L.L.C. (f/k/a Energy Alloys Services, L.L.C.) (4284); MEA RemainCo Cayman Holding, L.L.C. (f/k/a Energy Alloys Cayman Holding, L.L.C.) (3484); MEA RemainCo Mexico Holding Co. – Majority, LLC (f/k/a Energy Alloys Mexico Holding Co. – Majority, LLC) (9165); MEA RemainCo Mexico Holding Co. – Minority, LLC (f/k/a 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.

and 565] (each, a “**Final Fee Application**” and collectively, the “**Final Fee Applications**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”).

2. Pursuant to the Final Fee Applications, objections to each of the Final Fee Applications, if any, were to be filed and served no later than September 23, 2021 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”). The Applicants received no responses or objections to the Final Fee Applications prior to the Objection Deadline. The hearing to consider approval of the Final Fee Applications is currently scheduled for October 27, 2021 at 11:30 a.m. (prevailing Eastern Time).

3. Given the lack of objections to the approval of the Final Fee Applications, the Debtors prepared a proposed form of order (the “**Final Fee Order**”) approving the Final Fee Applications. A copy of the Final Fee Order is attached hereto as **Exhibit A**. The Final Fee Order has been circulated without objection to the Office of the United States Trustee for the District of Delaware. The Final Fee Order has also been circulated to counsel to the Liquidation Trustee (as defined in the *Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* [Docket No. 508-1]) and each Applicant, and the aforementioned parties do not object to the Bankruptcy Court’s entry of the Final Fee Order.

WHEREFORE, the Debtors respectfully request that the Final Fee Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Bankruptcy Court.

Dated: October 20, 2021
Wilmington, Delaware

RICHARDS, LAYTON & FINGER, P.A.

/s/ J. Zachary Noble
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