

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

)	Chapter 11
In re:)	
)	Case No. 20-12088 (MFW)
)	
MEA RemainCo Holdings, LLC, <i>et al.</i> ,)	(Jointly Administered)
)	
Debtors. ¹)	
)	Re: Docket No: 568
)	

**CERTIFICATION OF COUNSEL REGARDING FIRST OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE LIQUIDATION TRUSTEE TO CERTAIN
(I) LATE FILED CLAIMS AND (II) INSUFFICIENT DOCUMENTATION CLAIMS
PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1**

The undersigned hereby certifies as follows:

1. On October 6, 2021, Terry S. Park in his capacity as the Liquidation Trustee (the “**Liquidation Trustee**”) of the MEA RemainCo Holdings, LLC (f/k/a Energy Alloys Holdings, LLC) Liquidation Trust (the “**Liquidation Trust**”), filed the *First Omnibus Objection (Non-Substantive) of the Liquidation Trustee to Certain (I) Late Filed Claims and (II) Insufficient Documentation Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-I* (the “**First Omnibus Objection**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). A proposed form of order (the “**Proposed Order**”)

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 Pineroft Drive, P.O. Box
 8819, The Woodlands, TX 77380.

granting the relief requested in the First Omnibus Objection was attached to the First Omnibus Objection as **Exhibit A**.

2. Pursuant to the First Omnibus Objection and the *Notice of Objection* filed with the First Omnibus Objection, responses to the First Omnibus Objection were to be filed and served by no later than October 20, 2021 at 4:00 p.m. (ET) (the “**Response Deadline**”).

3. Prior to the Response Deadline, the Liquidation Trustee received an informal response (the “**Response**”) from claimant Texas Comptroller of Public Accounts (the “**Texas Comptroller**”). The Liquidation Trustee has not received any other responses or objections to the First Omnibus Objection, and no other responses or objections thereto appear on the Court’s docket in these chapter 11 cases.

4. The Liquidation Trustee has resolved the Response by preparing a revised form of Proposed Order (the “**Revised Order**”).² The Liquidation Trustee has also agreed to extend the Response Deadline to November 10, 2021 at 4:00 p.m. (ET) solely with respect to the claim of the Texas Comptroller. The Revised Order has been circulated to the Texas Comptroller and the Texas Comptroller does not object to the entry of the Revised Order. A copy of the Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

² The Liquidation Trustee has removed Schedule 2 from the Revised Order. The Liquidation Trustee reserves all rights with respect to the claim asserted by the Texas Comptroller, including the right to include such claim on a future omnibus claims objection.

WHEREFORE, the Liquidation Trustee respectfully requests that the Revised Order, attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: October 21, 2021
Wilmington, Delaware

/s/ Scott D. Jones

Scott D. Cousins (No. 3079)

Scott D. Jones (No. 6672)

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*Counsel to Terry S. Park, solely in his capacity
as the Liquidation Trustee of the MEA
RemainCo Holdings, LLC (f/k/a Energy Alloys
Holdings, LLC) Liquidation Trust*