

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

In re:	)	Chapter 11
	)	
	)	Case No. 20-12088 (MFW)
	)	
MEA RemainCo Holdings, LLC, <i>et al.</i> ,	)	(Jointly Administered)
	)	
Debtors. <sup>1</sup>	)	<b>Re: Docket No: 569</b>
	)	

**CERTIFICATION OF COUNSEL REGARDING SECOND OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE LIQUIDATION TRUSTEE TO CERTAIN  
(I) MISCLASSIFIED CLAIMS AND (II) NO LIABILITY CLAIMS  
PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1**

The undersigned hereby certifies as follows:

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 *Second Omnibus Objection (Substantive) of the Liquidation Trustee to Certain (I) Misclassified Claims and (II) No Liability Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 569] (the “**Second Omnibus Objection**”).<sup>2</sup> A proposed form of order (the

<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined shall have the meanings ascribed to such term in the Second Omnibus Objection.

“**Proposed Order**”) granting the relief requested in the Second Omnibus Objection was attached to the Second Omnibus Objection as **Exhibit A**.

On October 27, 2021, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) held a hearing (the “**Hearing**”) to consider the relief requested in the Second Omnibus Objection. In accordance with the Court’s ruling at the Hearing, the Liquidation Trustee has revised the Proposed Order (the “**Revised Proposed Order**”) and Schedule 2 to the Proposed Order to add the “Additional Notes” column to the No Liability Claims which provides additional information supporting the Liquidation Trustee’s assertion of no liability. In addition, the Liquidating Trustee has removed Claim Nos. 3 and 8 pending further analysis of those claims. The Revised Proposed Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

*[Remainder of page left intentionally blank]*

WHEREFORE, as the Liquidation Trustee did not receive any responses to the Second Omnibus Objection and has revised the Proposed Order in accordance with the Court's ruling at the Hearing, the Liquidation Trustee respectfully requests that the Revised Proposed Order, attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: November 3, 2021  
Wilmington, Delaware

*/s/ Scott D. Jones*

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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*