

4. Each of the Lien Claimants acquired lien rights for services and materials supplied to the properties owned by the Debtors prior to the filing of the above-captioned bankruptcy cases. The Lien Claimants have filed proofs of claim in these bankruptcy cases, as detailed on the attached Exhibit "A".

5. Each of the Lien Claimants has requested that Fabyanske and Blank Rome represent them in connection with their lien claims asserted in these bankruptcy cases, and Fabyanske and Blank Rome have been retained pursuant to written agreements to provide representation in connection with such matters.

6. Upon information and belief, neither Fabyanske nor Blank Rome hold any claims against or interests in the Debtors.

7. An amended and supplemental Statement setting forth any material changes in the facts contained herein will be filed should any changes occur. I reserve the right to revise, supplement or amend this Statement at any time in the future.

8. This Statement is made solely for disclosure purposes pursuant to Federal Rule of Bankruptcy Procedure 2019, and nothing herein is, or should be construed as, an admission, acknowledgement, or waiver by or on behalf of any of the Lien Claimants.

I declare under penalty of perjury that the statements made herein are true and correct, to the best of my knowledge, information and belief.

Dated: June 13, 2017

/s/ Paul R. Ratelle
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Northern Industrial Erectors, Inc., Lakehead
Constructors, Inc., Tristan Fabricators, LLC, and
Hammerlund's Champion Steel, Inc., n/k/a Champion
Steel Minnesota, Inc.*

Exhibit A

Tristan Fabricators LLC, Claim No. 152 in the amount of \$438,702.25
Address: PO Box 308, Grand Rapids, MN 55744

Hammerlund's Champion Steel, Inc., n/k/a Champion Steel Minnesota, Inc., Claim No. 127 in
the amount of \$2,403,010.29
Address: 703 Pellet Ave., PO Box 280, Keewatin, MN 55753

Northern Industrial Erectors, Inc., Claim No. 162 in the amount of \$18,621,151.50
Address: PO Box 308, Grand Rapids, MN 55744

Rice Lake Contracting Corp., Claim No. 120 in the amount of \$6,591,548.03
Address: 22360 County Road 12, PO Box 517, Deerwood, MN 56444

A.W. Kuettel & Sons, Inc., Claim No. 123 in the amount of \$256,775.81
Address: 3930 Airpark Boulevard, Duluth, MN 55811

Lakehead Constructors, Inc., Claim No. 124 in the amount of \$2,531,068.62
Address: 2916 Hill Ave., Superior, Wisconsin 54880

Hammerlund Construction, Inc., Claim No. 140 in the amount of \$8,333,733.03
Address: 40 County Rd. 63, Grand Rapids, MN 55744

Edwards Oil, Inc., Claim No. 125 in the amount of \$700,007.17
Address: 820 N. Hoover Rd., Virginia, MN 55792

Parson's Electric, LLC, Claim No. 122 in the amount of \$2,152,426.59
Address: 5960 Main St. NE., Minneapolis, MN 55432