

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION**

IN RE:	:	CASE NO. 19-51200
	:	
CAMBRIAN HOLDING COMPANY, INC. et al,	:	CHAPTER 11
	:	(Joint Administration Granted)
	:	
DEBTORS.	:	JUDGE GREGORY R. SCHAAF

AFFIDAVIT CONCERNING MOTION FOR RELIEF FROM STAY
(Related Doc. No. 585, 599)

The undersigned counsel, on behalf of creditor Kentucky Employers' Mutual Insurance Company ("KEMI"), after being duly sworn, states as follows:

1. I am over the age of 18, of sound mind, and in all respects qualified to make the statements set forth in this Affidavit.

2. Pursuant to this Court's Order entered October 11, 2019 [Doc. No. 599], I state that the Motion for Relief From Stay is, upon information and belief, relevant to Debtor Cambrian Holding Company, Inc. (Case No. 19-51200), as said Debtor is the named insured under the relevant insurance policy. Said Debtor is indicated in the policy as being the employer of all workers to whom coverage is provided, with said policy listing all known locations, upon information and belief, at which Debtor employees may be employed.

Further, the affiant sayeth not.

Dated this 14th day of October, 2019.

FOWLER BELL PLLC

/s/ Matthew D. Ellison

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**ATTORNEYS FOR KENTUCKY
EMPLOYERS' MUTUAL INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this the 14th day of October, 2019, electronically in accordance with the method established under this Court's CM/ECF Administrative Procedures upon all parties in the electronic filing system in this case, including the United States Trustee and Debtors' counsel, and counsel for the Unsecured Creditors' Committee.

/s/ Matthew D. Ellison

**ATTORNEYS FOR KENTUCKY
EMPLOYERS' MUTUAL INSURANCE
COMPANY**