

ENTERED 10/22/2019

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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IN RE:	
EPIC COMPANIES, LLC, et al.	
Debtors ¹	

Chapter 11 Case No. 19-34752 (Jointly Administered)

ORDER GRANTING MOTION FOR ENTRY OF AGREED ORDER FOR RELIEF FROM AUTOMATIC STAY

(Docket No.222)

CAME ON to be considered Austin Waterman's Motion for Entry of Agreed Order

for Relief from Automatic Stay.

The Court finds that notice of the Motion and the hearing thereof, to the extent needed, were properly served. The Court after considering to the extent appropriate the pleadings, the evidence, and arguments of counsel, hereby finds that such Motion should be granted. It is therefore,

ORDERED, ADJUDGED, AND DECREED that: (1) Team Trident, LLC has agreed to defend and indemnify Debtors Epic Companies, LLC and Epic Diving & Marine Services, LLC in Cause No. 2019-01604 in the 129th Judicial District Court of Harris County, Texas, *Austin Waterman v. Epic Companies, LLC, Epic Diving & Marine Services, LLC, Team Trident, LLC and Aries Marine Corporation* (the "State Court Case"); and (2) that Team Trident, LLC has agreed not to file or assert any claim related to the State Court Case against the Debtors.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Epic Companies, LLC (1473), Epic Diving & Marine Services, LLC (2501), Epic Applied Technologies, LLC (5844), EPIC Specialty Services, LLC (8547), Epic Alabama Steel, LLC (6835), Epic San Francisco Shipyard, LLC (5763) and Zuma Rock Energy Services, LLC (1022). The address of the Debtors' headquarters is: 1080 Eldridge Parkway, Suite 1300, Houston, Texas 77077.

It is further ORDERED, ADJUDGED, AND DECREED that Austin Waterman's Motion for Entry of Agreed Order for Relief from Automatic Stay is **GRANTED** and that the automatic stay imposed by 11 U.S.C. § 362 is hereby **LIFTED**, immediately under Bankruptcy Rule 4001(a)(3) upon the entry of this Order, solely to permit Austin Waterman: (1) to prosecute his claims against Debtors Epic Companies, LLC (1473) and Epic Diving and Marine Services, LLC (2501) to final judgment in the State Court Case and (2) to execute, levy, and collect upon such final judgment as may be obtained in the State Court Case against available third party insurers, indemnifiers, and insurance proceeds.

Signed: October 18, 2019

DAVID R. JONES

UNITED STATES BANKRUPTCY JUDGE

APPROVED AND ENTRY REQUESTED:

/s/ Ryan E. Chapple Ryan E. Chapple (SBN 24036354) rchapple@cstrial.com CAIN & SKARNULIS PLLC 400 W. 15th Street, Suite 900 Austin, Texas 78701 512-477-5000 512-477-5011—Facsimile ATTORNEY FOR MOVANT AUSTIN WATERMAN

/s/ Shane M. Johnson John F. Higgins jhiggins@porterhedges.com Shane M. Johnson sjohnson@porterhedges.com **PORTER HEDGES LLP** 1000 Main Street, 36th Floor Houston, Texas 77002 713-226-6000 713-228-1331—Facsimile **ATTORNEY FOR DEBTORS EPIC COMPANIES, LLC EPIC DIVING & MARINE SERVICES, LLC** *electronically signed with permission

/s/ Suzanne Sharpless

David J. Plavnicky <u>djplav@pkmtexas.com</u> Suzanne E. Sharpless <u>sharpless@pkmtexas.com</u> **PLAVNICKY KINZEL MAKOWSKI LLP** 5300 Memorial Drive, Suite 675 Houston, Texas 77007 713-658-1111 713-658-8253—Facsimile **ATTORNEY FOR TEAM TRIDENT, LLC** *electronically signed with permission Case 19-34752 Document 332 Filed in TXSB on 10/24/19 Page 4 of 5

United States Bankruptcy Court Southern District of Texas

In re: Epic Companies, LLC Epic Alabama Steel, LLC Debtors Case No. 19-34752-drj Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4 User: aalo Page 1 of 2 Date Rcvd: Oct 22, 2019 Form ID: pdf002 Total Noticed: 29 Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 24, 2019. +Epic Alabama Steel, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 +Epic Applied Technologies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 +Epic Companies, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 db db db db +Epic Diving & Marine Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 +Epic San Francisco Shipyard, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-25 +Epic Specialty Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 +Zuma Rock Energy Services, LLC, 1080 Eldridge Parkway, Suite 1300, Houston, TX 77077-2583 db Houston, TX 77077-2583 db db +Andrew V. Tenzer, PaulHastings, LLP, 600 Travis Street, 58th Floor, aty Houstno, TX 77002-3009 +Michael S Waskiewicz, Burr Forman LLP, 50 N Laura Street, Ste 3000. aty Jacksonville, FL 32202-3658 +Thomas M Dupont, 5900 Highway 90 East, Broussard, LA 70518-5701 aty +American Longshore Mutual Association, Ltd. throug, c/o Leann O. Moses, 1100 Poydras Street, cr Suite 3100, New Orleans, LA 70163-1102 intp +Arena Offshore LP, Arena Offshore LP, 4200 Research Forest Drive, Suite 500, The Woodlands, TX 77381, UNITED STATES 77381-4224 +Chalos & Co, P.C., Chalos & Co, P.C., 7210 Tickner Street, Houston, TX 77055, cr UNITED STATES 77055-6935 UNITED STATES 7/055-6935
+Danos, L.L.C., 3878 West Main Street, Gray, LA 70359-6203
+David Wright, 28019 Buena Way, Spring, Tx 77386-2819
+Fairways Offshore Exploration, Inc., c/o McDowell Hetherington LLP, Attention: Jarrod B. Martin, 1001 Fannin, Suite 2700, Houston, TX 77002-6736
+Frederick J. Guidry, c/o Jason Welborn, P. O. Box 2053, Lafayette, LA 70502-2053
+Gulf Oceanic Marine Contractors, Inc., P.O. Box 99, Bourg, LA 70343-0099
Way Industrias LLC
A Compared P. Skelten Jr. cr cr intp cr cr +New Industries, LLC, c/o Barnet B. Skelton, Jr., Houston, TX 77002-5832 815 Walker, Suite 1502, cr intp +Offshore Domestic Group, LLC, c/o McDowell Hetherington LLP, Attention: Jarrod B. Martin, 1001 Fannin, Suite 2700, Houston, TX 77002-6736 ffshore Express, LLC, c/o McDowell Hetherington LLP, 1001 Fannin, Suite 2700, Houston, TX 77002-6736 +Offshore Express, LLC, Attention: Jarrod B. Martin, intp House Faining, Suffe 2000, Houseon, RX / Nov2-0530
 Hoffshore Technical Solutions, LLC, 690 S. Hollywood Rd, Houma, LA 70360-3226
 Taylors International Services, Inc., C/O Stephen C. Jackson, 1901 6th Ave North, 2400 Regions/Harbert Plaza, Birmingham, AL 35203
 +White Oak Global Advisors, LLC, PaulHastings, LLP, c/o Peter S. Burke, Control Contro cr cr intp 515 South Flower Street, 25th Floor, Los Angeles, CA 90071-2228 +Williams Field Services-Gulf Coast Company, L.P., c/o Stever 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705 c/o Steven W. Soule, cr Hall, Estill, et al., +Wright's Well Control Services LLC, 28019 Buena Way, Spring, Tx 77386-2819 cr Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. cr +E-mail/Text: c.rodrigue@bluewaterrubber.com Oct 22 2019 22:12:14 Bluewater Rubber & Gasket Company, 1119 Barrow Street, P O Drawer 190, Houma, LA 70361-0190 E-mail/Text: accounting@dhdoffshore.com Oct 22 2019 22:10:03 DHD Offshore Services, LLC, cr 7889 Hwy 182 E, Morgan City, LA 70380 E-mail/Text: houston_bankruptcy@LGBS.com Oct 22 2019 22:12:24 Harris County, cr Linebarger Goggan Blair & Sampson LLP, C/O John P. Dillman, PO Box 3064, Houston, TX 77253-3064 TOTAL: 3 ***** BYPASSED RECIPIENTS (undeliverable, * duplicate) ***** aty Norton Rose Fulbright US LLP cr Acadiana Rubber & Gasket Co. Aqueos Corporation cr Austin Waterman cr cr Blue Cross Blue Shield of Texas, a Division of Hea Bollinger Fourchon, LLC cr Bordelon Marine, LLC Candy Apple, LLC cr cr Curtin Maritime Corporation cr Cypress Energy Partners L.P. cr Dan Bunkering (America) Inc. cr cr Echo Offshore, LLC op Epiq Corporate Restructuring, LLC cr Express Supply and Steel, LLC Fugro USA Marine, Inc. cr cr Garber Bros, Inc. Goliath Offshore Holdings PTE.LTD, in pesonam cr Industrial Diesel Services, Inc. cr M/V Nor Goliath, in rem cr MM Industrial Fabrication, LLC cr cr Medsafe, Inc. and W. Joe Shaw, Ltd.

District/off: 0541-4		User: aalo	Page 2 of 2	Date Rcvd: Oct 22, 2019		
		Form ID: pdf002	Total Noticed: 29			
	***** BYPASSED R	ECIPIENTS (continued) **	* * *			
cr	National Oilwell Varco, L.P. d/b/a NOV Quality Tub					
cr	Oceanwide Cypress Ltd.					
cr	Oceanwide Netherlands BV					
cr	Oceanwide Texas, Inc.					
cr	Stern Offshore, B.V.					
crcm	The Official Committee of Unsecured Creditors					
intp	Vertex Services, LLC					
cr	Work Boat E	lectric Services, Inc.				
				TOTALS: 29, * 0, ## 0		

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 24, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 22, 2019 at the address(es) listed below: NONE.

TOTAL: 0