

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

In re:	§	Chapter 11
	§	
EPIC COMPANIES, LLC, <i>et al.</i>	§	Case No. 19-34752
	§	
Debtor.	§	

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' NOTICE OF RULE 2004  
EXAMINATION OF SEAN ROSS ARNETTE AND REQUEST FOR  
PRODUCTION OF DOCUMENTS AND SUBPOENA DUCES TECUM**

To: Sean Ross Arnette, individually and in his capacity as a former employee of Epic Companies, LLC.

PLEASE TAKE NOTICE, that pursuant to Rule 2004 and 9016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Bankruptcy Rule 2004-1 (the "Bankruptcy Local Rules"), the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned, jointly administered bankruptcy cases of Epic Companies, LLC, *et al.*, as debtors and debtors in possession (collectively, the "Debtors"), hereby files and serves this Notice of a Rule 2004 Examination and Request for Production of Documents and Subpoena Duces Tecum of Sean Ross Arnette.

The Committee intends to conduct your examination on December 9, 2019 at 9:00 a.m., at the offices of U.S. Legal Support – Philadelphia, 1818 Market Street, Suite 1400, Philadelphia, PA 19103, or at such other time and place as agreed to by you and the Committee,. The examination will continue from day to day until completed.

You are also requested and required to produce the documents and electronic information in accordance with the instructions and as listed in Exhibit "A" attached hereto to the undersigned counsel at U.S. Legal Support – Philadelphia, 1818 Market Street, Suite 1400, Philadelphia, PA



**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that I have attempted to confer with Sean Ross Arnette regarding this Notice, via his last known, primary home phone (346) 352-8197, on the 3rd Day of December, 2019, and have not been able to establish direct contact.

/s/ Dennis L. Roossien

Dennis L. Roossien

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 3rd day of December, 2019, in addition to service accomplished via this Court's CM/ECF system, he caused to be served a true and correct copy of the foregoing document upon the party listed below, via priority delivery:

Sean Ross Arnette  
3212 N. Providence Road  
Media, Pennsylvania 19063

/s/ Jay H. Ong

Jay H. Ong

**EXHIBIT A- REQUESTS FOR DOCUMENTS**

In addition to the defined terms set forth above, for the purposes of this Examination, and the items subject to production set forth below, the Definitions (regardless of capitalization) and Instructions below shall be utilized.

**I. DEFINITIONS**

As used herein, the following terms shall have the following meanings, irrespective of capitalization:

- A. “Acqua Liana” means Acqua Liana Capital Partners, LLC.
- B. “Alabama Shipyard” means EPIC Alabama Holdings, LLC; EPIC Maritime Asset Holdings, LLC; EPIC Alabama Maritime Assets, LLC; EPIC Alabama Shipyard, LLC; EPIC Recycling Services, LLC; EPIC Alabama Recyclers, LLC.
- C. “Bankruptcy Court” means the United States Bankruptcy Court for the Southern District of Texas, Houston Division.
- D. “Clarke” means Thomas M. Clarke; Ana M. Clarke; Orinoco; Acqua Liana; and any other entity owned in whole or in part by the foregoing that was involved in any way with the Debtors or the Debtor Affiliates.
- E. “Communication” means any contact or act by which information, of any form or nature, is transmitted or conveyed from one Person to another Person or between or among two or more Persons, regardless of whether conveyed through verbal, oral, visual, written, electronic, and/or through any other mode or medium or expression.
- F. “Debtors” or “Debtor Entities” means Epic Companies, LLC; Epic Diving & Marine Services, LLC; Epic Applied Technologies, LLC; EPIC Specialty Services, LLC; Epic Alabama Steel, LLC; Epic San Francisco Shipyard, LLC; Zuma Rock Energy Services, LLC, and TSB Offshore, Inc.

- G. “Debtor Affiliates” means Ranger, Alabama Shipyard, and TSB.
- H. “Oakridge” means Oakridge Energy Partners, LLC.
- I. “Orinoco” means Orinoco Natural Resources, LLC.
- J. “Person(s)” means and includes natural persons, firms, associations, agencies, and/or other organizations and entities cognizable by law, including, without limitation, private corporations, public corporations, partnerships, unincorporated associations, firms, offices, governments, governmental or political entities, and expressly includes officers, directors, advisors, employees and agents, each in their capacities as such.
- K. “Relating To” means embodying, pertaining to, concerning, constituting, comprising, reflecting, discussing, referring to or having any logical or factual connection whatever with the subject matter in question.
- L. “Requests” means the Requests for Production of Documents set forth in Section III of this Exhibit A, collectively, with each such numbered request thereunder being a “Request”.
- M. “TSB” means TETRA Applied Technologies, LLC; TSB Offshore, Inc.; and Maritech Resources, Inc.
- N. “You” means Sean Ross Arnette.
- O. “White Oak” means White Oak Global Advisors, LLC.

## II. INSTRUCTIONS

Failure to Produce. If, for reasons other than a claim of privilege, You refuse to produce any Documents described herein, please state the grounds upon which refusal is based with sufficient specificity to permit a determination of the propriety of such refusal.

Supplementation of Production. These Requests shall be deemed to be continuing and, therefore, pursuant to the provisions of Rule 26(e) of the Federal Rules of Civil Procedure, you

shall supplement your production of Documents if subsequent to the date of the production you learn that the production was in some material respect incomplete or incorrect and that the additional or corrective Documents have not otherwise been made previously available to the Committee and its counsel.

Scope. These Requests call for the production of all original Documents that are within Your possession, custody or control, or the possession, custody, or control of any of Your agents, attorneys or other representatives. In addition, these Requests call for the production of all copies of Documents and any drafts thereof (unless identical to other copies you have produced or are producing), preliminary or otherwise, which are within Your possession, custody or control or within the possession, custody, or control of any of your agents, attorneys or other representatives.

Singular/Plural. For the purposes of these Requests, the singular shall include the plural, and the plural shall include the singular.

"And" and "Or". Such terms shall each be individually interpreted in every instance as meaning "and/or" and shall not be interpreted disjunctively to exclude any information. Similarly, "Including" shall each be interpreted in every instance as meaning "including but not limited to" and shall not be interpreted as having any exclusive meaning.

Gender. All words and phrases shall be construed as masculine, feminine, or neuter gender, according to the context, and "and" and "or" shall be construed disjunctively or conjunctively.

Tense. The past tense includes the present tense where the clear meaning is not distorted by change of tense, and *vice-versa*.

Inability to Respond. If you cannot respond to a Request in full, please respond to the extent possible, indicating the part to which you are responding and submitting any supplemental information later.

Time Frame. Unless otherwise stated below, each of the following Subject Areas and Requests for Production of Documents encompasses the period beginning January 1, 2016, and continuing through the present.

**III. REQUESTS FOR PRODUCTION**

1. All Communications between You and any party, representative, employee, agent, or officer, of White Oak Relating To the Debtors, the Debtor Affiliates, Acqua Liana, Orinoco, Oakridge, or Clarke.