

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

In re:)	
)	Chapter 11
)	
STRIKE, LLC, <i>et al.</i> ¹)	Case No. 21-90054 (DRJ)
)	
Debtors.)	(Jointly Administered)
)	Re Docket Nos. 200, 465

**SUPPLEMENTAL DECLARATION OF ANDREW O’NEILL IN SUPPORT OF
DEBTORS’ APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS ATTORNEY TO
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Andrew O’Neill, pursuant to 28 U.S.C. § 1746, declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of White & Case LLP (“**White & Case**” or the “**Firm**”), an international law firm, which maintains offices for the practice of law at, among other locations, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606-4302. I am a member in good standing of the Bar of the State of Illinois, and I have been admitted to practice in Illinois. There are no disciplinary proceedings pending against me.

2. I submit this supplemental declaration (the “Supplemental Declaration”) on behalf of White & Case in further support of the *Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* [D.I. 200] (the “Application”) and to supplement the disclosures set forth in the

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors’ federal tax identification number, are: Strike, LLC (2120); Strike HoldCo, LLC (0607); Delta Directional Drilling, LLC (9896); Strike Global Holdings, LLC (4661); Capstone Infrastructure Services, LLC (0161); and Crossfire, LLC (7582). The location of Debtor Strike, LLC’s principal place of business and the Debtors’ service address is: 1800 Hughes Landing Boulevard, Suite 500, The Woodlands, Texas 77380. Additional information regarding this case may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/StrikeLLC>.

Declaration of Andrew O'Neill in Support of the Debtors' Application for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date [D.I. 200, Ex. A] (the "Initial Declaration") in accordance with Bankruptcy Rule 2014(a) and as required under the *Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition* [D.I. 465] ("Retention Order").²

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein.³

WHITE & CASE'S DISINTERESTEDNESS

4. In connection with my Initial Declaration, White & Case obtained from the Debtors and their agents the names of individuals and entities that may be parties in interest in these Chapter 11 Cases (the "Potential Parties in Interest"), which were first listed on Schedule 2 attached to the Initial Declaration. White & Case searched its database for connections to the entities listed on Schedule 2 to the Initial Declaration. The results of White & Case's searches of the Potential Parties in Interest were set forth in the Initial Declaration and Schedule 3 attached thereto, which identified that White & Case currently represents or has represented within the last three (3) years, certain individuals, entities, or their affiliates who are Potential Parties in Interest in matters unrelated to the Debtors, the Chapter 11 Cases, or such entities' claims against and interests in the Debtors.

5. The Initial Declaration also disclosed that none of the Potential Parties in Interest

² Capitalized terms used but not otherwise defined here have the meanings ascribed to such terms in the Application.

³ Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

represented more than 1% of White & Case's revenue for the twelve-month period through January 2022.

ADDITIONAL DISCLOSURES

6. As I stated in the Initial Declaration, White & Case has reviewed and will continue to review its files periodically during these Chapter 11 Cases with respect to known and newly identified parties in interest. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

7. Since the Petition Date, White & Case has updated those conflicts searches and searched additional parties as White & Case becomes aware of additional Potential Parties in Interest ("Supplemental Potential Parties in Interest"). White & Case has worked with the Debtors and their professionals to obtain names of individuals and entities that may be Supplemental Potential Parties in Interest in these Chapter 11 Cases, and such parties are listed on **Schedule 1** hereto, categorized for ease of reference.⁴

8. White & Case has searched on its electronic database for its connections to the Supplemental Potential Parties in Interest listed on Schedule 1. The information listed on Schedule 1 may have changed without White & Case's knowledge and may change during the pendency of these Chapter 11 Cases. Accordingly, White & Case will update this Supplemental Declaration as necessary and when White & Case becomes aware of additional material information.

⁴ The categorization of an entity is neither a concession as to whether such entity has a valid claim against the Debtors nor as to the nature of such claim. To the extent that a Supplemental Potential Party in Interest falls under more than one category, such Supplemental Potential Party in Interest is included in only one category. Furthermore, the inclusion of a Supplemental Potential Party in Interest within one or more categories is for convenience only and is not, and shall not be construed as, an acknowledgement or admission regarding any Supplemental Potential Party in Interest, including with respect to any claims or relationships that such Supplemental Potential Party in Interest may have with the Debtors.

9. Based on these searches, White & Case has identified certain Supplemental Potential Parties in Interest or their apparent affiliates that White & Case represents, or has represented within the last three (3) years, as a client in matters unrelated to the Debtors, the Chapter 11 Cases, or such entities' claims against or interests in the Debtors.⁵ The table attached hereto as **Schedule 2** lists the Supplemental Potential Parties in Interest identified through these searches as current or former clients of White & Case and the status of the matters in which White & Case represents or represented such Supplemental Potential Parties in Interest or their apparent affiliates, as applicable.

10. Furthermore, in relation to connections searches previously conducted on the Potential Parties in Interest disclosed in the Initial Declaration, White & Case may have opened new matters representing existing Potential Parties in Interest or their apparent affiliates on matters unrelated to the Debtors, the Chapter 11 Cases, or such entities' claims against or interests in the Debtors. As such, White & Case re-ran searches in its electronic database for the Potential Parties in Interest that were previously reviewed in the Application and the Initial Declaration.

11. Based on its periodic review of its files, the table attached hereto as **Schedule 3** identifies certain Potential Parties in Interest or their apparent affiliates that White & Case currently represents, or has represented since the filing of my Initial Declaration, in matters unrelated to the Debtors, the Chapter 11 Cases, or such entities' claims against or interests in the Debtors. In each instance, White & Case's representation related to matters unrelated to the Debtors, the Chapter

⁵ The term "client" means an entity listed as a client or affiliate of a client in an active or closed matter in White & Case's conflicts search system. To the extent that a Supplemental Potential Party in Interest falls under more than one category, such Supplemental Potential Party in Interest is disclosed below in only one category. Furthermore, the inclusion of a Supplemental Potential Party in Interest within one or more categories in the Application or this Declaration is for convenience only and is not, and shall not be construed as, an acknowledgment or admission regarding any Supplemental Potential Party in Interest, including with respect to any claims or relationships that such Supplemental Potential Party in Interest may have with the Debtors.

11 Cases, or such entities' claims against or interests in the Debtors.

12. None of the current or former clients listed on Schedules 2 and 3 represents more than 1% of White & Case's revenue for the twelve-month period from January 2021 through January 2022.

13. Moreover, it has come to my attention that Jason Perri, a partner at American Industrial Partners, the purchaser of substantially all of the Debtors' assets, is married to a White & Case partner in the Private Wealth & Family Offices group. The White & Case partner has no involvement in these Chapter 11 Cases. Out of an abundance of caution, White & Case has instituted formal screening measures to screen the White & Case partner from all aspects of White & Case's representation of the Debtors. I do not believe that this connection impacts White & Case meeting the disinterestedness standard under the Bankruptcy Code and White & Case has disclosed this connection out of an abundance of caution.

14. Thus, to the best of my knowledge, (i) White & Case is a "disinterested person" under section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors' estates, and (ii) White & Case has no connection with any of the Debtors, their affiliates, their creditors, or any other party in interest, or their respective attorneys and accountants, the United States Trustee for the Southern District of Texas or any person employed in the office of the same, or any judge of the United States Bankruptcy Court or District Court for the Southern District of Texas or any person in the offices of the same, except as may be disclosed in the Initial Declaration and this Declaration.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: February 18, 2022
Chicago, Illinois

Respectfully submitted,

/s/ Andrew O'Neill

Andrew O'Neill

Partner

WHITE & CASE LLP

Schedule 1

Supplemental Potential Parties in Interest List

Bank

Citibank, N.A.

Landlords and Lease Counterparties

4200 Morgantown Industrial Park, LLC
ARI Fleet LT
Automotive Rentals, Inc.
Flowood Drive Forest Properties I, L.P.
Grayson Wilmeth

Litigants

Bellsouth Telecommunications, LLC
Billy Cleveland
Corey Sechrist
Crossfire Aggregate Service LLC
Debra A. Stern
John A. Stern
Katie A. Sechrist
Keivonter Lewis

Ordinary Course Professionals

Bradley Arant Boult Cummings, LLP
Butler Snow
Eversheds Sutherland (US) LLP
Fulbright & Jaworski, LLP
Grant Thornton
Jones Walker, LLP
KE Andrews
Mayer Brown
Ogletree Deakins Nash Smoak & Stewart,
PC
Quan Law Group, LLC

Other Interested Parties

Acuren Inspection, Inc.
Beasley Tire Service, Inc.
Bell Supply Company, LLC
Brandon & Clark, Inc.
Crossfire Aggregate Services, LLC

Diamond G Inspection, Inc.
Ferguson Enterprises, Inc.
Gulf & Ship Island Railroad, LLC
Integrated Technology and Security, LLC
Messner Contracting Group, LLC
Smith Equipment Services, LLC
Tanmar Rentals, LLC

Rule 2019 Parties

Charbonneau Industries, Inc.
Perspective Talent LLC
Titan Towers, LP

Significant Creditors

Allison Lippert
Bottom Line Equipment, LLC
Claudia Wilson Frost
Consolidated Electrical Distributors, Inc.
Damone N. Eddy
Eloisa Barrera
Empire Services Inc.
Estate of Stephanie Eddy
Ford J. Frost
H&E Equipment Services, Inc.
IDV NPID, LP
Ingram Readymix, Inc.
Jorge Rosalba
Jose Bonilla
Katrina Flores
Marathon Petroleum Company LP
Martha Romo
Maria Hernandez
Myra Lamb
Nicholas Ali
Plains All American Pipeline, L.P.
Ramon Garcia
Select Environmental, LLC
Texas Gold Hydraulics Inc.
Top Line Rental, LLC
Transcontinental Gas Pipe Line Company
Tru-Tek Drilling

Williams Field Services, Inc.
Williams Partners L.P

Significant Customer Contracts

Advantek Shelby County, LLC
BASA Resources, Inc.
Carolina Gas Transmission, LLC
Delek Logistics Operating, LLC
DIRC Homes, LLC
DTM Louisiana Gathering, LLC
East Mississippi Electric Power Association
Enable Gas Transmission Co LLC
Enable Midstream Partners, LP
ETC Intrastate Procurement Co
ETC NGL Transport, LLC
ETC Northeast Pipeline, LLC
ETC Texas Pipeline, LTD
Florida Gas Transmission Company, LLC
Gemini Carthage Pipeline, LLC
Gulfterra Energy Partners, L.P.
Henkels & McCoy, Inc.
Houston Pipe Line Company, LP
Howard Midstream Energy Partners, LLC
Infratech Corporation
Live Oak Midstream Partners, LLC
Mockingbird Midstream Gas Services, LLC
Montana-Dakota Utilities Co.
National Fuel Gas Distribution Corporation
NorthStar Energy Services, Inc.
Panhandle Eastern Pipe Line Company, LP
Petroleum Fuels Company
R&D Land Improvements, LLC
Rosen USA
ROWC Energy Services, LLC
RT Ellis Pipeline Services
SemGas, LP
SemGroup
SICK PCA
Stateline Processing, LLC

Sunoco Partners Marketing & Terminals
L.P.
Sunoco Pipeline L.P.
Texas Pipeline Webb County Lean System,
LLC
Transwestern Pipeline Company, LLC
Trunkline Gas Company, LLC
UGI Utilities, Inc.
Upton Assets, LLC
WPS Industries Group

Significant Vendors

3-Gis LLC
4 Warriors Hydro Excavating
Big B Crane LLC
Black Gold Energy Services
Blackbeard Direction, LLC
Blue Eagle Oilfield Services LLC
Bobcat Heavy Civil LLC
C&W Underground Drilling LLC
Chaparral Industries Inc.
Dmd Fabrication & Services Inc.
E.L. Farmer & Co.
Equipmentsshare.com
Flow-Zone LTD
Foster Fence LTD
H-2 Enterprises LLC
Illinois Truck & Equipment
Industrial Electric Services Inc.
Intero Integrity Services US LLC
IV Kings Rig Technicians
JM Underground LLC
Klaus, Inc.
LA Construction and Drilling LLC
Legacy Construction LLC
Maxim Crane Works LP
McNorton Dewatering Inc.
Millbar Hyrdo-Test Inc.
Mrc Globale
Nickel Rock LLC

Petrolink USA, LLC
PMP Directional LLC
Professional Fiber Works LLC
Rain for Rent
Raymond Construction
Redi Services LLC
Rental King LLC
RK Payroll Solutions Inc.
Rockin E Construction
S2W Contracting LLC
Simpson Fiber LLC
Sorto Directional Boring LLC
Speed Technical Services LLC
SS Communications & Fiber Optics
Standard Rig Solutions LLC
Techcorr USA Management LLC
Texas Waste Control.com Inc.
Tongate Farm & Ranch
Topwater Energy Solutions LLC
Toro Complete Services Inc.
TruHorizon Environmental Solutions
TS Pipeline Services LLC
Valu Industrial ER Services LLC
West Texas Boring Company
Worldwide Machinery

Montgomery County MUD #67 TX
Montgomery County TX
Nueces County TX
Port Freeport TX
Reeves County TX
Special Road and Bridge District TX
Sweeny Community Hospital District TX
Sweeny Independent School District TX
Tennessee Attorney General's Office
Val Verde County TX
West Brazoria County Drainage District #11
TX
Zavala CAD TX

Taxing and Regulatory Authorities

Brazoria County Emergency Services
District #2 TX
Brazoria County TX
Chambers County Tax Office TX
City of Cleburne, Cleburne ISD TX
Commonwealth of Pennsylvania
Cypress-Fairbanks ISD TX
Dilley ISD TX
Frio Hospital District TX
Goliad County TX
Harris County TX
Hidalgo County TX
Jefferson County TX
La Pryor Independent School District TX
Midland County TX

Schedule 2**Results of the Connections Search on Supplemental Parties in Interest Listed on Schedule 1**

Category	Open Unrelated Client Matter(s)	Closed Unrelated Client Matter(s)
Bank	Citibank, N.A.	
Ordinary Course Professionals	Grant Thornton	
Significant Creditors	Marathon Petroleum Company LP	
Significant Customer Contracts	Carolina Gas Transmission, LLC Delek Logistics Operating, LLC Howard Midstream Energy Partners, LLC	
Significant Vendors	Worldwide Machinery	

Schedule 3**Results of the Updated Connections Search for Existing Potential Parties in Interest**

Category	Open Unrelated Client Matter(s)	Closed Unrelated Client Matter(s)
Insurance Parties	Axis Insurance Company/Axis Capital Limited	
Landlords and Lease Counterparties	Caterpillar Financial Services	
Lenders	Met Life Siemens Financial Services, Inc.	
Note Purchasers	OEP Crossfire LLC	
Significant Contract Counterparties	Buckeye Partners, LP Energy Transfer Partners, LP TC Energy Corporation BPX Energy	
Significant Customers	Bassell USA Inc. BP America Production Co. Lone Star NGL Pipeline LP Lyondell Chemical Company TransCanada USA Operations Inc.	
Significant Vendors	Wilmington Trust, Nat'l Assn Fidelity Investment Inst. Opera. Co. LLC	
Taxing and Regulatory Authorities	Wells Fargo Equipment Finance	
Utility Providers	Dominion Energy First Energy Corp. West Penn Power	