

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**SUPPLEMENTAL DECLARATION OF MARY E. MULLIGAN IN SUPPORT OF
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER PURSUANT TO
11 U.S.C. § 327(e) OF BANKRUPTCY CODE AND FED. R. BANKR. P. 2014 AND
2016 AUTHORIZING EMPLOYMENT AND RETENTION OF
FRIEDMAN KAPLAN SEILER & ADELMAN LLP AS SPECIAL
LITIGATION COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION
*NUNC PRO TUNC TO THE PETITION DATE***

I, Mary E. Mulligan, being duly sworn, hereby state as follows:

1. I am a partner at the firm of Friedman Kaplan Seiler & Adelman LLP ("Friedman Kaplan" or the "Firm"), a law firm specializing in complex commercial litigation and white collar criminal defense work, with a wide range of experience and expertise in defending institutional and individual clients in trials and other judicial proceedings, with its principal offices at 7 Times Square, New York, New York 10036. I am admitted in, practicing in, and a member in good standing of, the bar of the State of New York and the bar of the United States District Court for the Southern District of New York.

2. On June 30, 2022, the above-captioned debtor and debtor in possession (the "Debtor") filed the *Application for Entry of an Order Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Employment and Retention of Friedman Kaplan Seiler & Adelman LLP as Special Litigation Counsel to the Debtor and Debtor in Possession Nunc Pro*

¹ The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Tunc to the Petition Date [Docket No. 12] (the “Retention Application”).² In support of the Application, the Debtor submitted the *Declaration of Mary E. Mulligan In Support of Debtor’s Application for Entry of an Order Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Employment and Retention of Friedman Kaplan Seiler & Adelman LLP as Special Litigation Counsel to the Debtor and Debtor in Possession* Nunc Pro Tunc to the Petition Date (the “Mulligan Declaration”), which was attached to the Application as **Exhibit B**.

3. I submit this declaration to supplement the Mulligan Declaration (the “Supplemental Declaration”). Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

Services To Be Provided

4. The Debtor seeks to retain Friedman Kaplan to render necessary services relating to the CVA Litigation during the pendency of this chapter 11 case. The professional services that Friedman Kaplan will render include:

- (a) advising and assisting the Debtor with respect to the CVA Litigation-related matters;
- (b) drafting and/or reviewing any pleadings, motions, or other documents in connection with the CVA Litigation; and
- (c) performing additional ancillary services in the chapter 11 case, including attending hearings and/or mediation sessions; performing legal research; preparing for and participating in meetings of the Debtor’s board of directors; communicating and meeting with parties in the chapter 11 case; and engaging in potential litigation and discovery, if necessary, in the chapter 11 case ((a) through (c) collectively, the “Special Litigation Counsel Matters”).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Retention Application.

Professional Compensation

5. Notwithstanding anything to the contrary in the Application or the Engagement Letter,³ Friedman Kaplan has agreed (a) to be compensated for all postpetition services at its then applicable standard hourly rates less a discount of 25%, which currently range from \$775 per hour to \$1,900 for partners; \$550 to \$750 for associates; \$650 to \$1,800 for counsel and senior counsel; and \$275 to \$350 for law clerks and legal assistants, and (b) that all of the True-Up Fees that have been incurred prior to the Petition Date will be treated as a general unsecured claim in this chapter 11 case in the amount of \$1,508,495.00. Friedman Kaplan is willing to provide this substantial discount to the Debtor because of the unique and extraordinary circumstances of this chapter 11 case and the Debtor's status as a not-for-profit organization doing critical work in New York City.

Supplemental Disclosures

6. Since the filing of the Mulligan Declaration, Friedman Kaplan has conducted a further review of potential connections and relationships between Friedman Kaplan and parties in interest in this chapter 11 case within the categories set forth in an amended **Schedule 1** hereto (the "**Amended Potential Parties in Interest**") to determine that Friedman Kaplan did not have a prior representation that precluded its representation of the Debtor with respect to the Special Litigation Counsel Matters.

³ Friedman Kaplan was originally engaged by the Debtor to provide services in connection with potential civil litigation pursuant to an initial engagement letter dated January 29, 2019 (the "**Initial Letter**"). Under the terms of the Initial Letter, Friedman Kaplan billed at hourly rates in effect on December 31, 2018, with a 25% discount and, prior to the commencement of any civil litigation, a cap on monthly fees. On June 12, 2020, Friedman Kaplan and the Debtor executed a revised engagement letter ("**Engagement Letter**"), which superseded the Initial Letter. Under the terms of the Engagement Letter, which was retroactively effective as of January 1, 2020, Friedman Kaplan agreed to a special fee arrangement for its representation of the Debtor in the CVA Litigation. This fee arrangement was designed to take into account the Debtor's status as a not-for-profit organization doing critical work in New York City, that was facing mounting financial pressure as a result of the allegations of decades-ago misconduct asserted in the CVA Claims. Pursuant to the Engagement Letter, Friedman Kaplan agreed to bill the Debtor at a substantial reduction of its hourly rates and in consideration of this reduction, Friedman Kaplan and the Debtor agreed to a true-up, described in paragraph 7 of the Mulligan Declaration [Doc 12, Ex. B].

7. The records upon which this investigation is based are maintained by Friedman Kaplan in the ordinary course of business and are believed to be accurate. To the extent that I become aware hereafter that any such records or other information contained herein is not accurate or complete, I will promptly apprise the Court.

8. Based upon a review of the foregoing information, neither I, Friedman Kaplan, nor any partner, counsel or associate of Friedman Kaplan represents any entity other than the Debtor in connection with this chapter 11 case. In addition, to the best of my knowledge after due inquiry, neither I, Friedman Kaplan, nor any partner, counsel, or associate of Friedman Kaplan represents any party in interest in this chapter 11 case in matters related to this chapter 11 case.

9. Based upon a review of the foregoing information, Friedman Kaplan, and the partners, counsel and associates of Friedman Kaplan, presently represent, may have represented in the past, and may represent in the future, certain of the Amended Potential Parties-in-Interest (or affiliates of the Amended Potential Parties-in-Interest) that are claimants of and/or members of the Debtor and/or are parties-in-interest in this case, in matters wholly unrelated to the chapter 11 case. To the best of my knowledge, all such entities and the nature of Friedman Kaplan's representation of, or connections to, such entities are set forth on **Schedule 2** to this Declaration. Based upon such review, to the best of my knowledge, Friedman Kaplan does not hold or represent an interest adverse to the Debtor or its estate in the matters for which Friedman Kaplan is proposed to be retained.

10. Friedman Kaplan appears in cases, proceedings, and transactions involving many different attorneys, accountants, financial consultants, and financial advisors, some of which have represented in the past, represent now or may represent in the future claimants or other parties-in-interest in this case. Friedman Kaplan is not aware of any connection it has with such attorneys,

accountants, financial consultants, and investment bankers that would be adverse to the Debtor or its estate.

11. In addition to the foregoing, after reasonable inquiry, we conducted a supplemental review of potential connections and relationships between Friedman Kaplan and the potential parties in interest listed on **Schedule 1** hereto. Based on such review, except as set forth on **Schedule 2** attached hereto, I do not believe there is any connection between Friedman Kaplan and any party in interest listed on **Schedule 1**, including any connection with the U.S. Trustee or any person employed by the Office of the U.S. Trustee, other than Friedman Kaplan's usual and customary interactions and connections with the U.S. Trustee and the persons employed by the Office of the U.S. Trustee which arise in the ordinary course of business.

12. To the extent that I become aware of any additional connections that may be relevant to Friedman Kaplan's representation of the Debtor, I will promptly file a supplemental declaration.

[Remainder of page intentionally left blank.]

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 and belief.

Dated: August 9, 2022

/s/ Mary E. Mulligan

Mary E. Mulligan

Partner, Friedman Kaplan Seiler & Adelman LLP

Schedule 1

Amended Potential Parties in Interest

Amended Potential Parties in Interest

DEBTOR AND NON-DEBTOR AFFILIATES AND RELATED ENTITIES

MADISON SQUARE BOYS & GIRLS CLUB, INC.

MADISON SQUARE BOYS & GIRLS CLUB FOUNDATION, INC.

MSBGC-NYC SUPPORT CORPORATION

SOUTHERN DISTRICT OF NEW YORK BANKRUPTCY JUDGES

CHIEF JUDGE MARTIN GLENN

JUDGE LISA G. BECKERMAN

JUDGE SHELLEY C. CHAPMAN

JUDGE ROBERT D. DRAIN

JUDGE JAMES L. GARRITY, JR.

JUDGE DAVID S. JONES

JUDGE SEAN H. LANE

JUDGE CECELIA G. MORRIS

JUDGE MICHAEL E. WILES

STAFF FOR SOUTHERN DISTRICT OF NEW YORK BANKRUPTCY JUDGES

ALEXANDER KASNETZ

ANDRES BARAJAS

ANNIE ZIESING

BRENDA ROBIE

BRIAN HARKINS

CHANTEL BARRETT

CHRISTIAN RIBEIRO

CHRISTINE AZZARO

DANIEL HARKINS

DEANNA ANDERSON

DOROTHY LI

FRANCES FREDERICKS

FRANCIS O'ROURKE

GREG WHITE

JACQUELINE DEPIEROLA

JACQUELINE TRAN

JAMIE EISEN

JENNA MACDONALD

LESLIE KAN

LESLIE WYBIRAL

LIZA EBANKS

LORRAINE ECHEVARRIA

LYNDA CALDERON

MEREDITH MITNICK

MICHAEL BLACKMON

MICHAEL CONTINO

MICHELLE SANNEY

PATRICK CHEN
PUCCIA KARRA
ROBERT CARRASCO
TAYLOR JONES
TRACEY MERCADO
VANESSA ASHMEADE,
WILLIE RODRIGUEZ

STAFF FOR THE OFFICE OF THE UNITED STATES TRUSTEE FOR REGION 2

ALABA OGUNLEYE
ANDREA B. SCHWARTZ
ANDY VELEZ-RIVERA
ANNIE WELLS
BENJAMIN J. HIGGINS
BRIAN S. MASUMOTO
ERCILIA A. MENDOZA
GREG M. ZIPES
ILUSION RODRIGUEZ
JAMES GANNONE
LINDA A. RIFFKIN
MADELEINE VESCOVACCI
MARK BRUH
MARY V. MORONEY
NADKARNI JOSEPH
PAUL K. SCHWARTZBERG
RICHARD C. MORRISSEY
SHANNON SCOTT
SHARA CORNELL
SUSAN ARBEIT
SYLVESTER SHARP
TARA TIAN TIAN
VICTOR ABRIANO

GOVERNMENTAL/REGULATORY AGENCIES

DORMITORY AUTHORITY OF THE STATE OF NEW YORK
NEW YORK CITY DEPARTMENT OF YOUTH AND COMMUNITY DEVELOPMENT
NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION
NEW YORK STATE ALLIANCE FOR THE PREVENTION OF SEXUAL ABUSE
NEW YORK STATE CHILD AND ADULT CARE FOOD PROGRAM
NEW YORK STATE OFFICE OF ALCOHOLISM AND SUBSTANCE ABUSE SERVICES
NEW YORK STATE OFFICE OF CHILDREN AND FAMILY SERVICES
NEW YORK STATE OFFICE OF THE ATTORNEY GENERAL
OFFICE OF JUVENILE DELINQUENCY PROGRAM
UNITED STATES DEPARTMENT OF JUSTICE – OFFICE OF JUSTICE PROGRAMS

BANKRUPTCY AND CERTAIN ORDINARY COURSE PROFESSIONALS

EPIQ CORPORATE RESTRUCTURING

FINSBURY LLC

FRIEDMAN KAPLAN SEILER & ADELMAN LLP

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

PILLSBURY WINTHROP SHAW PITTMAN LLP

TENEO CAPITAL LLC

BANKS, INVESTMENT MANAGERS, AND SECURED LENDERS

BANK OF AMERICA

BROWN BROTHERS

CARVER BANK

CITI BANK

FIDELITY

JP MORGAN

JPMORGAN - CHILDS TRUST

LAMB FINANCIAL SERVICES

MERRILL LYNCH

NONPROFIT FINANCE FUND

PINNACLE SECURITIES

PNC BANK

RUANE CUNNIFF & GOLDFARB

RUANE CUNNIFF & GOLDFARB - SEQUOIA FUND

TRUFUND

VANGUARD

CURRENT & FORMER TRUSTEES, DIRECTORS, OFFICERS

ADAM L. REEDER

ALBERT R. DOWDEN

ALLISON SHURE

BARBARA A. TAYLOR

BARRY BREGMAN

BARRY RODRIGUES

BILL FEEHAN

BRIAN HOESTEREY

BRUCE GELB

DANIEL L. MOSLEY

DANIEL T. DONNELLY

DAVID FIELDS

DAVID J. GOLDRING

DAVID PECKER

DONALD C. DEVINE

ELIZABETH VELEZ

ERIC FRANDSON

FRANK FORTINO

FRED ARGIR

FRED PICCIRILLO
HEATHER BELLINI
HOPE KNIGHT
JARRETT TURNER
JEFFREY DOLD
JEFFREY VOLLING
JERRY M. SESLOWE
JOHN BINNIE
JOHN GELB
JOHN MCDONOUGH
JOHN STARR
JOSEPH GANTZ
JOSH NOVAK
JUSTIN MARCUS
JUSTIN NUNEZ
KEITH FLEISCHMAN
KENNETH B. MARLIN
KENNETH HALCOM
LEO P. ARNABOLDI III
LEO P. ARNABOLDI, JR
LISA SHALETT
MATTHEW PETERSEN
MICHAEL GELTZEILER
MICHAEL PUGH
MITCHELL SCHERZER
MYLES GILLESPIE
NATHAN SLEEPER
NICHOLAS F. TOMMASINO
NICK RUDD
OBA MCMILLAN
PATRICK GADSON
PATRICK GALLAGHER
PETER SCHEMAN
PETER SERPICO
POPPY HARLOW
RICHARD EADDY
RICHARD PORTER
ROBBIN MELE GAUDIERI
RON PORTER
ROY WEATHERS
SEAN WOODROFFE
STEPHEN GALLUCCI
STEVE ELBAUM
STEVEN MELTON
STEVEN MIYAO
STEVEN S. ELBAUM

STUART LEMPert
T. KENNETH FARRELL
THOMAS FORTIN
THOMAS MURPHY, SR.
TIM MCCHRISTIAN
TREVOR FENNELL
VANESSA TOUMA
VICTOR F. GANZI
WILLIAM E. FLAHERTY
WILLIAM F. GLAVIN, JR
WILLIAM G. PARRETT

INSURANCE PROVIDERS

ARGONAUT INSURANCE CO.
CHUBB GROUP
CHURCH MUTUAL INSURANCE CO.
EMPIRE BLUECROSS BLUESHIELD
FEDERAL INSURANCE COMPANY
HALLMARK SPECIALTY INSURANCE CO.
PHILADELPHIA INSURANCE COMPANY
RSUI LANDMARK AMERICAN INSURANCE CO.
STARSTONE NATIONAL INSURANCE CO.

LANDLORD

NATIONAL MULTIPLE SCHLEROSIS SOCIETY

LITIGATION PARTIES AND COUNTERPARTIES AND COUNSEL¹

A.B.
A.F.
A.G.
AARON HUMPHREY
ALFRED FALZON
AMONDO SAPIRO
ANDREW CAWLEY
ANTHONY VARUOLA
ANTOWNE FRAZIER
ARNOLD GLIM
ARTHUR TREMERE
AVAN LOGAN
B.D.

¹ The individual plaintiffs' names are consistent with the names or pseudonyms reflected in public filings. While Friedman Kaplan reviewed the actual names of each individual plaintiffs for its conflicts process, for the purposes of their inclusion on this Schedule 1, only the plaintiffs' pseudonyms are used, where applicable, consistent with the Confidentiality Procedures approved under the *Order (I) Authorizing and Approving Special Noticing and Confidentiality Procedures, (II) Authorizing and Approving Procedures for Providing Notice of Commencement, and (III) Granting Related Relief* [Docket No. 32].

BRIAN TATE
C.C.
C.D.
CARL MINUSKIN
C.R.
C.S.
CHRISTOPHER CLARK
CLEVELAND WHITE
COLIN MOSS
D.C.
D.M.
DENNIS FARLEY
DERRICK WELCH
DEXTER BLACKMAN
E.C. [950404/2020]
E.M. [70172/2021E]
E.M. [950681/2020]
E.M.R.
EDDY STWAERD
E.T.
EDWARD HUNTER
EDWARD TOFANI
EDWIN VELEZ
EMILE BLACKMAN
EMMANUEL FALZON
ENZO OMBRAMONTI
ERIC LEBRON
ERIC ROSADO
FRANK BITETTO
FRANK PESCE
G.F.
G.R.
GEORGE DANIELLO
GERALD CARSON
GUSTAVE CHAPPORY
HARRY WADE
HECTOR BUSH
HENRI BONNER
HENRY KING
I.R.
IKEM LOGAN
ISRAEL DIAZ
JOSEPH FARAGUNA
J.A.M.
J.C.
J.G.

J.L.
J.R.
JAMES PAIGE
JAMES SULLIVAN
JAY SAPIRO
JOHN DOE
JOHN MARKS
JOHNNY GARCIA
JONATHAN DRECHSLER
JOSEPH CIAPPA
JOSEPH FALZON
JOSEPH GALLO
JOSEPH GENTILE
JOSEPH MCBRIDE
JOSEPH O'BRIEN
JOSEPH P. SALAMONE, JR.
JOSEPH VARUOLA
JULIO ROSADO
K.P.
K.R.
KENNETH GRANT
L.B.
L.R.
LAWRENCE DAVIS
LAWRENCE NOLAN
LEON POWELL
LOUIS HEREDIA
M.H.
M.S.
MARC TAYLOR
"MARIA HOFFMAN"
MARK THOMPSON
MATTHEW SPENCER
MICHAEL CUSUMANO
MICHAEL DANIELLO
MICHAEL FAYE
MICHAEL JACOBS
MICHAEL PAIGE
N.B.A.
NEFTALI CENTENO
NEFTALI CEMENTENO
PERRY POWELL
PETER CAMILLERI
PHILLIP HARRIS
R.A.
R.B.

R.C.
R.F.
R.F. II
R.M.
R.S.
RAMON ACOSTA
RAMOS REYES
RANDALL JAMES
RENZO BUSETTI
RICHARD VESPI
ROBERT LIGUORI
ROBERT O'LEARY
ROBERT RAMIREZ
ROBERT SERRINGER
ROBERTO GONZALEZ
ROGER WELCH
RONALD PROKOPIAK
S.R. [950449/2020]
S.R.
SAMUEL CASTRILLO
PETER STUCZ
STEVEN SORGE
T.F.
DAVID TOFANI
ROBERT TOFANI
TERRENCE BROWNE
TERRENCE LOGAN
THE ESTATE OF EMMANUEL WILLIAM SORGE
THOMAS LOGERFO
THOMAS M. LUKAS
TYRONE LOGAN
VITO PESCE
WILLIAM MCFIELD
WILLIAM SORGE
Z.Y.
ABEND & SILBER, PLLC
ABRAHAM, WATKINS, NICHOLS, SORRELS, AGOSTO & AZIZ
ANDREOZZI & ASSOCIATES, P.C.
BLEAKLEY PLATT & SCHMIDT, LLP
CUTI HECKER WANG LLP
DUNDON ADVISERS LLC
GRANT & EISENHOFER, P.A.
HACH ROSE SCHIRIPPA & CHEVERIE, LLP
HARNICK AND HARNICK, P.C.
HERMAN LAW FIRM
JEFF ANDERSON & ASSOCIATES, P.A.

LEVY KONIGSBERG LLP
LOWEY DANNENBERG, P.C.
MARCOWITZ LAW FIRM
MERSON LAW, PLLC
PACHULSKI STANG ZIEHL & JONES LLP
PFAU COCHRAN VERTETIS AMALA PLLC
RAPHAELSON & LEVINE LAW FIRM, P.C.
ROCKEFELLER UNIVERSITY
ROPES & GRAY LLP
SEEGER WEISS LLP
SILVER & KELMACHER, LLP
SLATER SLATER SCHULMAN LLP
THE MARSH LAW FIRM, PLLC
THE SIMPSON TUEGEL FIRM
WEITZ & LUXENBERG
WILLIAMS CEDER LLC

**SIGNIFICANT VENDORS, UTILITIES, CONTRACT COUNTERPARTIES, AND UCC
LIEN COUNTERPARTIES**

42ND STREET LESSEE LLC
501 AUCTION LLC
ABRAR QAIUM
ADP, INC.
ADT SECURITY SERVICES
ADVANCE CLADDING CONSTRUCTION COMPANY
AFA PROTECTIVE SYSTEMS, INC.
AFLAC NEW YORK
AIA, ALERA GROUP
ALDA BUILDING COMPANY LLC
ALEX DONNER ENTERTAINMENT, CORP.
ALL AMERICAN SCHOOL BUS CORP.
ALLIED ASBESTOS SERVICE LLC
ALLSTATE LIFE INSURANCE COMPANY
ALLSTATE SERVICES GROUP LLC
AMAZON CAPITAL SERVICES
AMERICAN EXPRESS
AMERIFLEX
ANTHEM LIFE & DISABILITY INSURANCE CO.
APPRAISERS AND PLANNERS INC.
ARAMARK
AUTHNET GATEWAY
AV DESIGN INTEGRATION
BABY DUNK
BALLARD SPAHR LLP
BASE TECHNOLOGIES, INC.
BCM ONE

BEL-AQUA POOL SUPPLY INC.
BETHANY HDFC
BKD, LLP
BLACKBAUD
BOYS & GIRLS CLUB OF HARLEM
BOYS & GIRLS CLUBS OF AMERICA
BROADWAY UNLOCKED
BRONX AQUATICS & SAFETY INC.
BSN SPORTS INC
CABLEVISION
CARDWORKS ACQUIRING
CHARTER COMMUNICATIONS
CHURCH MUTUAL
CITY OF FINANCE COMMISSIONER
CLASSY, INC.
CON EDISON
CONNEY SAFETY
CREATIVE ART WORKS
CROWN AWARDS
CROWN CASTLE FIBER LLC
CROWN JANITORIAL
CROWN TROPHY, INC.
CT CORPORATION
CYA, INC
DAWELL CONSULTING LLC
DE LAGE LANDEN FINANCIAL SERVICES, INC.
DELL BUSINESS CREDIT
DELOITTE CONSULTING LLP
DINOSAUR RESTAURANTS LLC
DRAIN KLEEN SEWER SERVICES INC.
EDELMAN SULTAN KNOX WOOD ARCHITECTS LLP
EFFICIENT COMBUSTION & COOLING CORP.
EL RAVEN PRODUCTIONS
EMPIRE FIRE SYSTEMS LLC
ENGIE
EXTRA SPACE STORAGE
FEDERAL EXPRESS CORP.
FIRST ADVANTAGE BACKGROUND SERVICES CORP.
FIRSTMARK SERVICES
FLYER MIKE DESIGNS, LLC
FOUR SEASONS PROMOS, LLC
FRANKIE'S CARNIVAL TIME, INC.
FUZE, INC.
GEM MECHANICAL LLC
GIVESMART US, INC.
GO CHARITY

GOTHAM ARCHITECTURAL GLASS & SIGN
GRACI PAVING ASSOCIATES INC.
GROWTH AND DEVELOPMENT SERVICES, INC.
HANZEL LI
HELIUM PLUS EAST INC.
HILLMANN CONSULTING, LLC
HSO PRODUCTIONS INC.
HYDRO LANE, INC.
IF IT'S WATER, INC.
INDEPENDENT ELEVATOR INSPECTIONS, INC
INLAND PRINTING COMPANY
INSURANCE ARCHAEOLOGY GROUP
INTEGRATED AQUATICS ENGINEERING
J & L SERVICE NYC INC.
JMV CONSULTING ENGINEERING, P.C.
JOHN TODD
JUNK PROS
KAUFMAN IRON WORKS
KIDS IN SEATS INC.
KIPS BAY BOYS & GIRLS CLUB
KNIGHT MARKETING CORP.
KONE INC.
KVL AUDIO VISUAL SERVICES, INC
LAMB INSURANCE SERVICES
LAWLESS & MANGIONE
LAWYERS ALLIANCE FOR NEW YORK
LEADER ELECTRIC COMPANY
LEAF COMMERCIAL CAPITAL
LIBERTY COCA-COLA BEVERAGES LLC
LIBERTY INDUSTRIAL GAS & WELDING
LIBERTY SCIENCE CENTER
LIGHTHOUSE DOCUMENT TECHNOLOGIES, INC.
LOM PROPERTY CONSULTING LLC
MAGIC MECHANICAL
MAMA FOUNDATION FOR THE ARTS, INC.
METROPOLIS GROUP INC.
METROPOLITAN LIFE
METROTECH SYSTEMS
MILLIMAN
MUTUAL SECURITY SERVICES, INC.
NARDELLO & CO LLC
NATIONAL FIRE EXTINGUISHER CO.
NATIONAL GRID
NATIONAL MULTIPLE SCLEROSIS SOCIETY
NEW YORK BUSINESS SYSTEMS
NEW YORK CITY WATER BOARD

NEW YORK DEPARTMENT OF LAW
NEW YORK STATE ALLIANCE
NFOCUS SOLUTIONS
NOBLE ELEVATOR COMPANY INC.
NONPROFIT SOLUTIONS NETWORK CORP.
NOTES FOR NOTES
NOVAK FRANCELLA LLC
NUVISION SOLUTIONS LLC
NY STATE ALLIANCE
NYC FIRE DEPARTMENT
NYC WATER BOARD
NYS DEPT. OF ENVIRONMENTAL CONSERVATION
ORKIN INC.
ORKIN PEST CONTROL
OUTREACH DEVELOPMENT CORP.
PADUANO & WEINTRAUB LLP
PITNEY BOWES GLOBAL FINANCIAL
PITNEY BOWES PURCHASE POWER
PLYWOOD PICTURES LLC
POL. WIRE TECH INC.
POLAR AIR CONDITIONING INC.
QUILL CORPORATION
REGINA CATERERS INC.
ROBINSON'S INDUSTRIAL GAS AND EQUIPMENT CORP.
ROTO ROOTER PLUMBING SERVICES
RT TRANSPORTATION & TOURS, LLC
S&S WORLDWIDE, INC.
S.D.L. APPLIANCE REPAIR SERVICE
SBW, INC.
SEAN KERSHAW
SEND IN THE CLOWNS ENTERTAINMENT
SERVICE MECHANICAL INC.
SHELTERPOINT LIFE INSURANCE CO.
SIGMA
SLEEPY HOLLOW COUNTRY CLUB
SOLVE IT SIMPLE LLC
STAPLES
STAPLES ADVANTAGE
STAR GROUP PRODUCTIONS
SUNESYS ENTERPRISE LLC
SWOOP
SYSCO METRO NEW YORK LLC
THE COTOCON GROUP
THE METRO GROUP, INC.
TIME WARNER CABLE
TOTAL AQUARIUMS INC.

TOWER ELEVATOR CONSULTING & TESTING LLC
TOYOTA FINANCIAL SERVICES
TRANSPERFECT LEGAL SOLUTIONS
TREMONT ELECTRIC SUPPLY COMPANY
TRI WELD INDUSTRIES, INC.
TWI-LAQ INDUSTRIES, INC.
ULINE
UNITED STAFFING SOLUTIONS, INC.
UNITED WAY
VAL WIRING CORP.
VENABLE LLP
VERIZON WIRELESS
WEBSTER LOCK & HARDWARE CO.

Schedule 2

Amended Connections to Potential Parties in Interest

Matched Entity	Connection to Debtor	Connection to Friedman Kaplan¹
NYC Water Board	Significant Vendors, Utilities, Contract Counterparties, and UCC Lien Counterparties	Former Client

¹ The term “former client” means any entity listed as a client, or related to a client, in the Friedman Kaplan conflicts search system where the matter is reported as closed within the last three (3) years.