

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WILLIAMS INDUSTRIAL SERVICES
GROUP INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10961 (BLS)

(Jointly Administered)

**NOTICE OF *SECOND AMENDED*² AGENDA FOR THE HEARING SCHEDULED FOR
SEPTEMBER 7, 2023, AT 2:00 P.M. (ET)³**

**THE HEARING WILL BE CONDUCTED IN-PERSON AND BY ZOOM.
PARTICIPANTS APPEARING BY ZOOM ARE REQUIRED
TO REGISTER NO LATER THAN WEDNESDAY, SEPTEMBER 6, 2023, AT 4:00 P.M.
(ET) PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:**

<https://debuscourts.zoomgov.com/meeting/register/vJltdu-trzgoH8MROCRM6VItefiwHZ4G7NA>

**AFTER REGISTERING, YOU WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING INFORMATION ABOUT JOINING THE MEETING.**

AUDIO FOR THE HEARING WILL BE PROVIDED BY ZOOM ONLY.

I. MATTERS GOING FORWARD

1. Motion for Entry of an Order (I) Approving Bidding Procedures for the Sale of Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Debtors' Authority to Sell, (III) Scheduling Bid Deadlines and an Auction, (IV)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Williams Industrial Services Group Inc. (1378), Williams Industrial Services Group, LLC (2666), Williams Industrial Services, LLC (0406), Williams Plant Services, LLC (9575), Williams Specialty Services, LLC (9578), WISG Electrical, LLC (6918), Construction & Maintenance Professionals, LLC (0925), Williams Global Services, Inc. (3708), Steam Enterprises, LLC (9177), GPEG LLC (5707), Global Power Professional Services, Inc. (2550), WISG Canada Ltd. (B.N. 6518), WISG Nuclear Ltd. (B.N. 3510), and WISG Electrical Ltd. (B.N. 2116). The location of the Debtors' corporate headquarters and service address is: 200 Ashford Center N, Suite 425, Atlanta, GA 30338.

² **Amended items are in bold.**

³ All motions and other pleadings referenced herein are available online at either of the following web addresses: <https://dm.epiq11.com/WilliamsIndustrialServicesGroup> or <https://dm.epiq11.com/WISGRP>.

Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief [[D.I. 33](#); 7/24/23].

Objection Deadline: September 5, 2023, at 5:00 p.m. (ET). Extended to September 6, 2023, for Bechtel in relation to cure objection amount. Extended to September 6, 2023, for Harco National Insurance Company in relation to the sale motion.

Related Pleadings:

- A. Order (I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief [[D.I. 196](#); 8/19/23].
- B. Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [[D.I. 203](#); 8/22/23].
- C. Notice of Auction Cancellation and Designation of Successful Bidder [[D.I. 231](#); 8/30/23].
- D. Declaration of Steven E. Birchfield in Support of the Debtors' Sale Motion and EnergySolutions Nuclear Services, LLC's Adequate Assurance of Future Performance [[D.I. 243](#); 8/31/23].
- E. Second Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [[D.I. 249](#); 9/1/23].
- F. Notice of Successful Bidder's Assumption and Assignment of Executory Contracts and Unexpired Leases [[D.I. 289](#); 9/5/23].
- G. Amended Notice of Successfully Bidder's Assumption and Assignment of Executory Contracts and Unexpired Leases [[D.I. 300](#); 9/7/23].**
- H. Notice of Filing Revised Proposed Order (A) Approving the Sale of Assets Free and Clear of All Claims, Liens, Rights, Interests, and Encumbrances, (B) Authorizing the Debtors to Perform Their Obligations Under the Purchase Agreement and Other Transaction Documents, (C) Authorizing and Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (D) Granting Related Relief [[D.I. 301](#); 9/7/23].**

Sale Objections Received: Informal comments from Cigna, the Committee, the Lenders and the U.S. Trustee.

Cure Objection Received:

- A. Objection of the Consolidated Edison Company of New York, Inc. to Notice to Contract Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases [[D.I. 257](#); 9/1/23].
- B. Response by Southern Nuclear Operating Company to Debtor's Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [[D.I. 263](#); 9/1/23].
- C. Tennessee Valley Authority's Limited Objection to Debtors' Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [[D.I. 288](#); 9/5/23].
- D. Objection of Bechtel Power Corporation to Sale and Assumption of Related Executory Contracts and Unexpired Leases [[D.I. 292](#); 9/6/23].
- E. Informal comments received from: Bad Day Fabrications; Hudson Elevator Group; Sunbelt Rentals; United Rentals; WestRock; Martin Marietta Materials; UKG; SolCyber; Southern Nuclear Operating Company; and the Official Committee of Unsecured Creditors.

Status: This matter is going forward with respect to the sale. The hearing on cure objections has been adjourned to September 20, 2023, at 10:30 a.m. (ET). **The objections of Bechtel Power Corporation and Consolidated Edison Company of New York have been resolved.**

- 2. Motion for an Order Approving the Debtors' (A) Key Employee Retention Program, (B) Key Employee Incentive Program, and (C) Granting Certain Related Relief [[D.I. 162](#); 8/15/23].

Objection Deadline: At the hearing.

Related Pleadings:

- A. Order Shortening Notice Period for and Scheduling Expedited Hearing on Motion for an Order Approving the Debtors' A) Key Employee Retention Program, (B) Key Employee Incentive Program, and (C) Granting Certain Related Relief [[D.I. 195](#); 8/19/23].
- B. Notice of Motion for an Order Approving the Debtors' (A) Key Employee Retention Program, (B) Key Employee Incentive Program, and (C) Granting Certain Related Relief [[D.I. 197](#); 8/21/23].

Objections Received:

- A. Objection of the United States Trustee to Debtors' Motion for an Order Approving the Debtors' (A) Key Employee Retention Program, (B) Key Employee Incentive Program, and (C) Granting Certain Related Relief [[D.I. 242](#); 8/30/23].
- B. The Official Committee of Unsecured Creditors' Objection and Reservation of Rights to the Debtors' Motion for Entry of an Order Approving the Debtors' (A) Key Employee Retention Program, (B) Key Employee Incentive Program, and (C) Granting Certain Related Relief [[D.I. 261](#); 9/1/23].

Status: This matter is going forward.

- 3. Debtors' Expedited Motion for Entry of an Interim and Final Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in Williams Industrial Services Group Inc.; and (B) Granting Related Relief [[D.I. 227](#); 8/29/23].

Objection Deadline: At the hearing.

Related Pleadings:

- A. Notice of Interim and Final Hearings with Respect to Expedited Motion for (I) Entry of an Interim and Final Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in Williams Industrial Services Group Inc.; and (II) Granting Related Relief [[D.I. 240](#); 8/30/23].
- B. Certification of Counsel Regarding the Interim Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in Williams Industrial Services Group Inc.; and (B) Granting Related Relief [[D.I. 298](#); 9/7/23].

Objections Received: Informal comments from the U.S. Trustee.

Status: **The Debtors have submitted a revised form of interim order under certification of counsel reflecting the resolution of this matter.**

Dated: September 7, 2023
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

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