

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

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Re: Docket No. 600

**SUPPLEMENTAL DECLARATION OF LAURA MARCERO IN
SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF YELLOW CORPORATION, *ET AL.*
TO RETAIN AND EMPLOY HURON CONSULTING SERVICES LLC
AS FINANCIAL ADVISOR, *NUNC PRO TUNC* TO AUGUST 21, 2023**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), I, Laura Marcero, declare under penalty of perjury that:

1. I am a Managing Director of Huron Consulting Services LLC (“Huron”), a professional services firm with numerous offices throughout the country. I am duly authorized to make this supplemental declaration (the “Supplemental Declaration”) on behalf of Huron.

2. I submit this Supplemental Declaration to supplement the disclosures included in my original declaration, dated September 18, 2023 (the “Initial Declaration”) that was attached as Exhibit C to the *Application of the Official Committee of Unsecured Creditors of Yellow Corporation, et al. to Retain and Employ Huron Consulting Services LLC as Financial Advisor, Nunc Pro Tunc to August 21, 2023* [Docket No. 600] (the “Application”).²

3. I have personal knowledge of each of the facts stated in this Supplemental Declaration, except for those facts stated on information and belief and, as to those facts, I am

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

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

informed and believe them to be true. If called as a witness, I would testify as to the matters set forth below based upon my personal knowledge.

A. Huron Affiliates

4. The following entities are subsidiaries or affiliates of Huron (collectively, the “Huron Affiliates”):

- *Active Huron Affiliates:*
 - Huron Consulting Group Inc.
 - Huron Consulting Group Holdings LLC
 - Huron Transaction Advisory LLC
 - Huron Managed Services LLC
 - Huron Advisors Canada Limited
 - Huron Consulting Services UK LTD (f/k/a Pope Woodhead & Associates Limited)
 - Huron Eurasia India Private Limited
 - Innosight Holdings, LLC
 - Innosight Consulting, LLC
 - Huron Aviation One LLC
 - Huron Aviation Two LLC
 - Innosight International, LLC
 - Innosight Consulting Asia-Pacific Pte. Ltd.
 - Innosight Consulting SARL
 - Huron Saudi Limited
- Huron Affiliates in the process of dissolution or merger into the foregoing active Huron Affiliates:
 - Studer Holdings, Inc.
 - The Studer Group, LLC
 - Huron Management Services LLC
 - Huron Demand LLC
 - Huron Consulting Saudi Limited

5. I am informed that relationships information for each of the Huron Affiliates listed above is included in the database which was the basis of the relationship disclosure in the Initial Declaration.

6. Neither Huron nor any of the Huron Affiliates: (i) manage any investment vehicles; (ii) have any investments in the Debtors or their affiliates; (iii) control, manage, administer or

supervise any investments or investment vehicles with respect to the Debtors or any investments in the Debtors; or (iv) perform any investment activities for its own profit or for its employees.

7. No Huron personnel assigned to this engagement is a direct holder of any of the Debtors' securities.

8. It is possible that certain of Huron's employees, managing directors, board members, equity holders or an affiliate of any of the foregoing may own interests in mutual funds or other investment vehicles (including various types of private funds) that own the Debtors' or other parties in interest's debt or equity securities or other financial instruments, including bank loans and other obligations. Typically, the holders of such interests have no control over investment decisions related to such investment funds or financial instruments. Further, Huron's internal policies prohibit its employees from personally trading in the Debtors' securities.

B. Huron's Disinterestedness

9. As described herein and in the Initial Declaration, Huron engaged in a detailed review process to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest materially adverse to the Chapter 11 Cases. The search included all matters involving all Huron Affiliates. All connections that Huron discovered between Huron and the Potentially Interested Parties are disclosed in **Schedule 2** to the Initial Declaration.

10. Based on the results of its review, Huron does not have a relationship with any of the Potentially Interested Parties in matters related to these Chapter 11 Cases. Huron has provided and could reasonably be expected to continue to provide services unrelated to these Chapter 11 Cases to its current clients in matters involving the individuals and entities listed on **Schedule 1** to the Initial Declaration.

11. To the best of my knowledge, neither Huron nor any of Huron's principals have entered into any agreements, express or implied, with any other party in interest, including the Debtors, any creditor or any attorney for such party in interest in these Chapter 11 Cases: (a) for the purpose of sharing or fixing fees or other compensation to be paid to any such party in interest or its attorneys for services rendered in connection therewith; (b) for payment of such compensation from the assets of the estates in excess of the compensation allowed by this Court pursuant to the applicable provisions of the Bankruptcy Code; or (c) for payment of compensation in connection with these Chapter 11 Cases other than in accordance with the applicable provisions of the Bankruptcy Code.

12. Except as otherwise set forth in the Initial Declaration or herein, insofar as I have been able to determine, neither I nor Huron represents any interest adverse to the estates or any class of creditors.

13. If Huron discovers additional information requiring disclosure, Huron will promptly file a supplemental disclosure with this Court as required by Bankruptcy Rule 2014.

14. Huron reserves the right to supplement this Supplemental Declaration in the event that Huron discovers any facts bearing on matters described in this Supplemental Declaration regarding Huron's employment by the Committee.

I declare under penalty of perjury that the foregoing is true and correct. This Supplemental Declaration is made subject to the penalties of 28 U.S.C. § 1746 relating to unsworn falsifications to authorities.

Dated: September 28, 2023

By: Laura Marcero
Laura Marcero
Managing Director
Huron Consulting Services LLC