

ENTERED

November 09, 2023

Nathan Ochsner, Clerk

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

In re:

STRIKE, LLC, *et al.*¹

Debtors.


)
) Chapter 11
)
) Case No. 21-90054
)
) (Jointly Administered)
)**PROTECTIVE ORDER LIMITING CLEVELANDS' DISCOVERY**

Upon consideration of the *Motion* ("Motion") for *Protective Order*, the Court finds that good cause exists to limit the Cleveland's discovery served on the Liquidating Trustee. It is therefore ORDERED THAT:

1. The Liquidating Trustee does not have to answer interrogatories 2-11, 14-15, 18, 20, 22-23, and request for production 1 (to the extent it relates to one of the interrogatories to which the Liquidating Trustee objects) in the Discovery attached as **Exhibit A** to this Order.

2. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: November 09, 2023



Marvin Isgur
United States Bankruptcy Judge

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. More information about this case may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/StrikeLLC>.

EXHIBIT A
Discovery

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

In re:)	Chapter 11
STRIKE, LLC, <i>et al.</i> ,)	Case No. 21-90054 (DRJ)
DEBTORS ¹)	(Jointly Administered)
)	

**CLEVELAND PARTIES' FIRST SET OF INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS AND
REQUESTS FOR ADMISSIONS**

Please take notice that, pursuant to Rules 7033, 7034 and 7036 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), as made applicable to this contested matter pursuant to Rule 9014(c) of the Bankruptcy Rules, Patrick Bartels, the Trustee of the Strike Liquidating Trust, is commanded to answer the foregoing Interrogatories and Request for Admissions and produce the documents and electronic information identified in the attached **Exhibit “A”** to **Baker Donelson**, 100 Vision Drive, Suite 400, Jackson, MS 39211 no later than November 8, 2023 at 5:00 p.m. CT, counsel for Billy Cleveland, Tammy Cleveland, and Circle C Investments, LLC (the “Cleveland Parties”).²

Please take further notice that the Cleveland Parties reserve their rights under the Bankruptcy Rules, to amend, supplement, and/or modify Exhibit “A” attached hereto in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and other applicable law.

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)

² The Court has approved expedited discovery in connection with the Wind-Down Debtors and Liquidating Trustee’s Emergency Motion for Order to Show Cause filed on October 16, 2023. The Hearing on the Motion is currently set for November 14, 2023.

Dated: October 31, 2023

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ**
A Professional Corporation

By: /s/ Susan C. Mathews
Susan C. Mathews
Texas Bar No. 05060650
smathews@bakerdonelson.com
1301 McKinney St., Suite 3700
Houston, Texas 77010
Telephone: (713) 650-9700
Facsimile: (713) 650-9701

- and -

D. Sterling Kidd (MB No. 103670)
(Admitted *Pro Hac Vice*)
(skidd@bakerdonelson.com)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
Post Office Box 14167
Jackson, Mississippi 39236-4167
Telephone: (601) 351-2400
Facsimile: (601) 351-2424

**COUNSEL FOR DEFENDANTS BILLY
CLEVELAND, TAMMY CLEVELAND, AND
CIRCLE C INVESTMENTS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served a true and correct copy of the foregoing
discovery requests were served electronically via email on the parties listed below.

Genevieve M. Graham
Jackson Walker LLP
1419 McKinney Suite 1900
Houston, TX 77010
ggraham@jw.com

Thomas A. Wolley, III
McCloskey, Robertson Wodley PLLC
190 T.C. Jester Blvd., Suite 400
Houston, TX 7707
rwolley@mrwpllc.com

Susan C. Mathews
Susan C. Mathews

EXHIBIT “A”

DEFINITIONS

1. “Communication” means the transmittal of information of any kind, in any form, and by any means, and therefore includes, but is not limited to, any telephone conversation, face-to-face meeting or conversation, visit, conference, internal or external discussion, or exchange of Documents. All written Communications shall include, without limitation, electronic, printed, typed, handwritten or other readable Documents, correspondence, memos, reports, contracts, both initial and subsequent, diaries, logbooks, minutes, notes, studies, surveys, forecasts, emails, text messages, and instant messages. A Document Request concerning any Communication among or between specified parties includes a request for any Communication among or between such parties, whether or not such Communication included or was directed to any other person.

2. The terms “concerning” and “relating to” (or an any variation thereof) mean describing, discussing, constituting, containing, considering, embodying, evaluating, mentioning, memorializing, supporting, collaborating, demonstrating, proving, evidencing, showing, refuting, disputing, rebutting, regarding, controverting, contradicting, made in connection with or by reason of, or derived or arising there from.

3. “You” and “Your” refer to the Wind-Down Debtors and Patrick Bartels, the Trustee of the Strike Liquidating Trust.

4. “Petition” means Plaintiff’s Original Petition filed by Patrick Bartels in the case styled *Patrick Bartels, as Trustee for the Strike Liquidating Trust v. Stephen V. Pate, et al.*, currently pending in the District Court of Harris County, Texas, docketed as Cause No. 2023-03047.

5. “Petition Date” means December 6, 2021, the date the Debtors filed their voluntary chapter 11 petitions under Chapter 11 of Title 11 of the United States Code.

6. “Petition Transactions” means all actions and inactions for which You seek recovery in the Petition.

7. “Pates” means the individuals named as defendants in the Petition.

8. “Plan” means the Debtors’ Joint Chapter 11 Plan of Liquidation of Strike, LLC and Affiliated Debtors confirmed by the Bankruptcy Court on May 17, 2023.

9. “Trust” means the Strike Liquidating Trust established pursuant to the Plan.

10. “Trustee” means Patrick Bartels.

11. “Wind-Down Debtors” refers to the Debtors as they currently exist following confirmation of the Plan and their manager, Patrick Bartels.

12. The plural includes the singular, and the singular includes the plural.

13. The use of the present tense includes the past tense, the use of the past tense shall include the present tense, and the use of any verb in any tense shall be construed as including the use of that verb in all other tenses.

14. “Document” means any medium upon which information can be recorded, and includes the original and each non-identical copy of the document. “Document” further includes all written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including but not limited to, all printouts, memoranda, letters, minutes, correspondence, notes, notebooks, books, forms, drawings, sketches, graphs, maps, charts, photographs, and other writings or data of any kind on which information is stored or from which information can be obtained. “Document” also includes Electronically Stored Information including without limitation documents, email, files, posts, images, photographs, video, video recordings, audio, audio recordings, texts, messages and all other writings, data, or data

compilations, stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation into a reasonably usable form.

INSTRUCTIONS FOR INTERROGATORIES

1. These Interrogatories are directed to the Trustee and the answers are to be completed to the best of his knowledge, by the person with the most knowledge, and based on the best knowledge of his counsel, agents, shareholders, directors, servants, investigators, employees, associates, predecessors, representatives and any other person acting or purporting to act on his behalf.

2. Each Interrogatory shall be answered separately and fully in writing, under oath, unless it is objected to, in which event the objecting party shall specifically state the ground for the objection, including, but not limited to, any privilege or other immunity upon which you are relying and shall answer to the extent the Interrogatory is not objectionable.

3. In answering each Interrogatory, identify each document, communication, or act:

- a. Relied upon in the preparation of each answer;
- b. Which forms all or part of the basis for that answer;
- c. Which corroborates the answer; or
- d. The substance of which forms all or part of the answer.

4. You may, in lieu of identifying any document or written communication, attach a true copy of such document or communication as an exhibit to the answers to these Interrogatories, including an explicit reference to the Interrogatory to which each such attached document or written communication relates.

5. If you choose to withhold identification of a document from production or inspection on the ground of privilege or other immunity from discovery, please provide the following

information: the nature of the privilege claimed (including work product), the type of document, general subject matter of the document, such other information sufficient to identify the document for a subpoena duces tecum or a document request, including its date, author, addressee or recipient, relationship between the author and addressee, present location, custodian and number of pages.

6. If you object to fully identifying an oral communication because of a privilege, you must nevertheless provide the following information:

- a. The nature of the privilege claimed (including work product);
- b. If the privilege is being asserted in connection with a claim or defense governed by state law, the state privilege rule must be invoked;
- c. The date of the oral communication;
- d. The place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and
- e. The general subject matter of the oral communication.

7. You may answer an Interrogatory in whole or in part by attaching document(s) (as defined herein) which contains the requested information. Such document(s) may, if authenticated, be a copy of the original. Any document(s) used to answer an Interrogatory may contain other information as well. The relevant portion of said document(s) must be so marked or indexed.

8. Where, in answer to an Interrogatory, it is plain that there is or was communication or notice that substantiates or relates to said answer, state whether each such communication or notice was oral or written. If written, attach a true copy thereof to your answers. If oral, identify (as defined herein) each such communication.

9. If the answer to all or any part of the Interrogatory is not presently known, or available, include a statement to that effect, furnish the information known or available, specify the nature and

extent of your inability to answer the remainder, and respond to the entire Interrogatory by supplemental answer, in writing, under oath. Please also state whatever information you have concerning the unanswered portions and identify the person(s) who may have additional knowledge or information regarding the subject.

10. For each Interrogatory, please identify the person(s) from whom the information contained in the answer was obtained and the person(s) who swears to the truth of that information.

11. Whenever, in any answer to an Interrogatory, a reference is made to one or more persons, specify by name the particular person to whom the reference is intended.

12. Where an individual Interrogatory calls for an answer that involves more than one part, each part of the answer should be clearly set forth and numbered or lettered to correspond with the appropriate subpart of that Interrogatory.

13. Each of the following Interrogatories is to be regarded as continuing to the extent permitted under the Federal Rules of Civil Procedure. If, subsequent to serving an answer to any Interrogatory and prior to the trial of this action, you obtain or become aware of additional information pertaining to that Interrogatory, you shall serve a supplemental sworn answer setting forth such information.

INTERROGATORIES

1. When did the claims which are the subject of the Petition accrue?
2. What is the approximate date that the Debtor, Strike, LCC, became insolvent as defined under 11 U.S.C. §101(32)?
3. Do you contend that any claims for breach of fiduciary duty which may have arisen prior to the date of insolvency belong to the Trust?
4. Who were the officers and directors of Strike, LLC as of February 12, 2021?
5. Who were the officers and directors of Strike HoldCo, LLC as of February 12, 2021?
6. Who were the officers and directors of Strike Capital, LLC as of the Petition Date?
7. Who owned the equity interests of Strike Capital, LLC on February 12, 2021?
8. Who owned the equity interests of Strike Capital, LLC on the Petition Date?
9. What is the factual basis for your contention that the Pates breached any applicable legal duty by paying salaries to themselves and their family members?
10. Identify by date and amount the salaries that You contend were improperly paid to Kevin Pate prior to December 11, 2020.
11. Identify by date and amount the salaries that You contend were improperly paid to Richie Pate prior to December 11, 2020
12. How did the payment of salaries to the Pates or their family members harm any of the Debtors?
13. What is the factual basis for Your contention that the Trust is the sole holder of these claims?
14. What is the factual basis for your contention that the Pates breached any applicable legal duty by employing a personal team of accountants?
15. Identify by date and amount the alleged improper payments to personal accountants.

16. How did Strike's employment of a personal team of accountants harm any of the Debtors?

17. What is the factual basis for Your contention that You are the sole owner of these claims?

18. What is the factual basis for your contention that the Pates breached any applicable legal duty with respect to the payments related to the Pate Ranches?

19. How did payments related to the Pate Ranches harm any of the Debtors?

20. Identify by date and amount the alleged improper payments related to the Pate Ranches.

21. What is the factual basis for Your contention that the Trust is the sole owner of these claims?

22. What is the factual basis for your contention that the Pates breached any applicable legal duty with respect to the Twin Timbers transaction?

23. Identify by date and amount all monetary losses from the Twin Timbers transaction sustained the Debtors prior to December 10, 2020.

24. How did the Twin Timbers transaction harm any of the Debtors?

25. What is the factual basis for Your contention that the Trust is the sole owner of these claims?

INSTRUCTIONS FOR REQUESTS FOR ADMISSION

1. Pursuant to Fed. R. Civ. P. 36 and Fed. R. Bankr. P. 7036, the Cleveland Parties serve the requests for admissions set forth below. If a matter is not admitted, the answer must specifically deny it or state in detail why the answering party cannot truthfully admit or deny it. A denial must fairly respond to the substance of the matter, and when good faith requires that a party qualify an answer or deny only part of a matter, the answer must specify the part admitted and qualify or deny the rest. The answering party may assert lack of knowledge or information as a reason for failing to admit or deny only if the party states that it has made a reasonable inquiry and that the information it knows or can readily obtain is insufficient to admit or deny.

2. In accordance with Fed. R. Civ. P. 26(e) and Fed. R. Bankr. P. 7026(e), these discovery requests are continuing in nature. If you obtain information upon the basis of which you know that a response was incorrect or incomplete when made, or such that though correct and complete when made, a response is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading, then supplementation of your response is required.

REQUESTS FOR ADMISSION

1. Admit or deny that Strike, LLC was a closely-held corporation prior to the Mill Point restructure in 2021.

2. Admit or deny that the Trustee does not hold a claim arising under the purchase agreement between the Clevelands and Strike, LLC relating to the sale of the Delta Directional business and assets to Strike, LLC.

3. Admit or deny that the Trust does not hold a claim for the Cleveland Parties' loss of their preferred distribution rights/membership rights as a result of the Debtors' corporate restructures.

4. Admit or deny that, at all times relevant to the Petition, Billy Cleveland was a member in Strike, LLC.

5. Admit or deny that, all times relevant to the Petition, Billy Cleveland was a member in Strike Capital, LLC.

6. Admit or deny that the Cleveland Parties are entitled to pursue direct claims against Pate Holdings and the Pates and any other parties for their damages arising from the Pates' actions with respect to the sale of the Delta Directional business and the transactions which eliminated the Cleveland Parties' membership interests in Strike, LLC and later, Strike Capital, LLC.

INSTRUCTIONS FOR REQUEST FOR PRODUCTION

1. Each Request is to be responded to pursuant to the instructions and definitions contained herein. The document requests seek the production of the original and all non-identical copies of the specified documents.
2. Each Request is to be set forth immediately above the answer or objection to the Request.
3. The Request to which the documents produced are responsive shall be designated.
4. No specific document request or listing of documents contained in a document request shall be construed or understood as limiting any other document request or the general language in the same Request.
5. If any requested document is alleged to be privileged or otherwise protected from discovery, you are required to state the following with regard to each document:
 - (a) its author,
 - (b) the date of its creation,
 - (c) its addressees,
 - (d) its general nature and subject matter, and
 - (e) the basis upon which it is claimed to be privileged or otherwise protected from discovery.
6. The request for production of documents shall be continuing, and you are required to supplement your Responses to this Request for Production of Documents by immediately producing for inspection and copying any requested document that comes into your possession or subject to your custody or control subsequent to the date of this Request.

REQUESTS FOR PRODUCTION

1. All Documents that You relied on in answering Interrogatory Nos. 1 through 27 above.
2. All Communications You have had with the Pates regarding whether Billy Cleveland or any of his entities own the claims at issue in the Petition.

United States Bankruptcy Court
Southern District of Texas

In re:
Strike, LLC
Capstone Infrastructure Services, LLC
Debtors

Case No. 21-90054-mi
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Nov 09, 2023

User: ADIuser
Form ID: pdf002

Page 1 of 6
Total Noticed: 110

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
++	Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. § 342(f)/Fed. R. Bank. P. 2002(g)(4).
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 11, 2023:

Recip ID	Recipient Name and Address
db	+ Capstone Infrastructure Services, LLC, 1800 Hughes Landing Blvd., Suite 500, The Woodlands, TX 77380-1684
db	#+ Crossfire, LLC, 820 Airport Road, Durango, CO 81303-8854
db	+ Delta Directional Drilling, LLC, 9027 Eastside Drive, Newtown, MS 39345-8056
db	+ Strike Global Holdings, LLC, 460 Wildwood Forest Dr., Suite 350N, Spring, TX 77380-3884
db	+ Strike HoldCo, LLC, 460 Wildwood Forest Dr., Suite 350N, Spring, TX 77380-3884
db	+ Strike, LLC, 460 Wildwood Forest Dr., Suite 350N, Spring, TX 77380-4194
aty	Barry J Sallinger, Attorney at Law, PO Box 2433, Lafayette, LA 70502-2433
aty	+ Jared A, Davidson, Taylor Wellons Politz, 1555 Poydras St., Ste 2000, New Orleans, LA 70112-3718
aty	+ John C Sims, Sims Hubbert et al, PO Box 10236, Lubbock, TX 79408-3236
aty	+ Matthew Hoffman, Hoffman & Saweris, p.c., 2777 Allen Parkway, Suite 1000, Houston, TX 77019-2165
cr	+ ARI Fleet LT, Adams and Reese LLP, c/o Richard A. Aguilar, 701 Poydras St., Suite 4500, New Orleans, LA 70139-4596
cr	+ AXIS Industrial Services, LLC, c/o Chamberlain Hrdicka, Attention: Reagan H. Tres Gibbs, III, 1200 Smith Street, Suite 1400, Houston, TX 77002-4496
cr	+ Automotive Rentals, Inc., Adams and Reese LLP, c/o Richard A. Aguilar, 701 Poydras St., Suite 4500, New Orleans, LA 70139-4596
cr	+ Bayou Technical Services LP dba Bayou Electrical S, c/o Sean M. Rooney, J D Herberger & Associates, PC, 11767 Katy Freeway, Suite 920, Houston, TX 77079-1782
cr	+ Beasley Tire Service, Inc., 2225 Crockett Street, Houston, TX 77007-3924
cr	+ Bell Supply Company, LLC, c/o Dore' Rothberg McKay, P.C., 17171 Park Row, Suite 160, Houston, TX 77084-4927
cr	+ Blackwell Enterprises, Inc., 14860 Railway Ave., 14860 Railway Ave., Wayne, OK 73095-3275
cr	+ CLM Equipment Company, Inc., 3135 Hwy. 90 East, Broussard, LA 70518-3222
cr	+ Certain Texas Taxing Entities, Perdue, Brandon, Fielder, Collins & Mott, 1235 North Loop West Suite 600, Houston, TX 77008-1772
cr	+ Charbonneau Industries, Inc., 1619 E. Richey Rd., Houston, TX 77073-3512
cr	+ Circle C Investments, LLC, c/o Susan C. Mathews; Baker, Donelson, B, 1301 McKinney Street, Suite 3700, Houston, TX 77010-3034
cr	+ Commonwealth of Pennsylvania, Department of Revenue, Office of Attorney General, 1251 Waterfront Place, Mezzanine Level, Pittsburgh, PA 15222 UNITED STATES 15222-4227
cr	+ Consolidated Electrical Distributors, Inc., c/o Andrews Myers, PC, Attn: Lisa M. Norman, 1885 Saint James Place, 15th Floor Houston, TX 77056-4176
cr	+ Cross Country Infrastructure Services Inc., Timothy R Ploch PC, 730 N Post oak Rd, Suite 100, Houston, TX 77024-4051
cr	+ Crossfire Aggregate Services, LLC, Gray Reed, c/o Paul D. Moak, 1300 Post Oak Blvd., Suite 2000 Houston, TX 77056-8000
cr	+ Deb Secrest, Commonwealth of Pennsylvania, Department of Labor and Industry, Collections Support Unit, PO Box 68568 Harrisburg, PA 17106-8568
cr	+ Elliott Electric Supply, Inc., c/o Misti L Beanland, Esq., Matthews, Shiels, Knott, LLP, 8131 LBJ Freeway, Suite 700, Dallas, TX 75251-1352
cr	+ Eloisa Barrera, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713
cr	+ Ezra Lee, Gray Reed, c/o Paul D. Moak, 1300 Post Oak Blvd., Suite 2000 Houston, TX 77056-8000
cr	+ FVL, Ltd, 1331 Lamar Street, Suite 1350, Houston, TX 77010-3036
cr	+ Ferguson Enterprises, Inc., c/o Dore Rothberg McKay, P.C., 17171 Park Row, Suite 160, Houston, TX 77084-4927
cr	+ Hilda Garza, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713
cr	+ Ignite Energy Services, LLC, c/o Allen M. DeBard, Langley & Banack, Inc., 745 E Mulberry Ave Fl 7, San Antonio, TX 78212-3141
cr	+ Ingram Readymix, Inc., 3580 FM 482, New Braunfels, TX 78132, UNITED STATES 78132-5099

District/off: 0541-4

User: ADIuser

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Date Rcvd: Nov 09, 2023

Form ID: pdf002

Total Noticed: 110

cr + Integrated Technology & Security, LLC, c/o Marc P. Henry, 6420 Wellington Place, Beaumont, TX 77706-3206

cr + J&J Excavating & Materials, Co., c/o Allen M. DeBard, Langley & Banack, Inc., 745 E. Mulberry Ave Fl 7, San Antonio, TX 78212-3141

cr + J2 Resources, LLC, c/o Misty A. Segura, Spencer Fane LLP, 3040 Post Oak Blvd., Ste. 1300, Houston, TX 77056 UNITED STATES 77056-6584

cr + JW Rentals, Inc., Ronald A. Simank, Schauer & Simank, PC, 615 N. Upper Broadway, Suite 700, Corpus Christi, TX 78401 UNITED STATES 78401-0857

cr + Jason Bynum, c/o Matthew Probus, The Probus Law Firm, 10497 Town and Country Way, #930, Houston, TX 77024-1119

cr + Jorge Rosalba, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Jose Arias, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Jose Bonilla, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Katrina Flores, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Louisiana Department of Revenue, Senior Bankruptcy Counsel, Litigation, 617 N. Third Street, Office 780, P O Box 4064 (Zip 70821-4064), Baton Rouge, LA 70802 UNITED STATES OF AMERICA 70821-4064

cr + Lumen Technologies, Inc., 100 CenturyLink Drive, Monroe, LA 71203-2041

cr + Manuel Garza, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Marathon Petroleum Company LP, c/o Ronald E. Gold, Frost Brown Todd LLC, 3300 Great American Tower, 301 E. Fourth St. Cincinnati, OH 45202-4257

cr + Maria Hernandez, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Martha Romo, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Maxim Crane Works, L.P., c/o Robert P. Franke, Clark Hill, 901 Main St., Suite 6000, Dallas, TX 75202-3748

cr + Merchants Automotive Group, Inc., c/o Timothy A. Million, Husch Blackwell LLP, 600 Travis Street, Suite 2350, Houston, TX 77002-2629

cr + Midship Pipeline Company, LLC, 700 Milam Street, Suite 1900, Houston, TX 77002-2835

cr + Myra Lamb, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr ++ OHIO DEPARTMENT OF TAXATION, BANKRUPTCY DIVISION, 30 EAST BROAD STREET, COLUMBUS OHIO 43215-3414 address filed with court., Ohio Department of Taxation, c/o Ohio Attorney General, 30 E. Broad Street 14th Floor, Columbus, OH 43215

cr + One Hughes Landing, LLC, c/o Howard Marc Spector, Spector & Cox, PLLC, 12770 Coit Road, Suite 850 Dallas, TX 75251-1364

cr + PSS Industrial Group aka Pipeline Supply & Service, 10507 Ella Blvd, Houston, Tx 77038-2333

cr + Pioneer Natural Resources USA, Inc., c/o Clayton D. Ketter, Phillips Murrah P.C., 101 North Robinson Avenue, 13th Fl, Oklahoma City, OK 73102-5523

cr + Plains All American Pipeline, L.P., c/o Law Ofc Patricia Williams Prewitt, 2456 FM 112, Taylor, TX 76574-4509

cr + Ramon Garcia, Daniels and Tredennick PLLC, 6363 Woodway Dr., Suite 700, Houston, TX 77057-1713

cr + Rental King, LLC, 3705-B South CR 1210, Midland, TX 79706-6261

cr + Scott-Macon Equipment Rental, Inc., c/o John S. Collins, Vorys, Sater, Seymour and Pease LLP, 909 Fannin St., Suite 2700, Houston, TX 77010-1009

cr + Select Environmental, LLC, c/o Thompson, O'Brien, Kappler & Nasuti., 2 Sun Court, Suite 400, Peachtree Corners, GA 30092-2865

cr + Signature Financial LLC, c/o Quilling, Selander, Lownds, et al, Attn: Frank S. Patel, 2001 Bryan Street, Suite 1800 Dallas, TX 75201-3071

cr + Smith Equipment Services, LLC, Smith Equipment Services, LLC, 201 Lakeway Dr., Brookeland, TX 75931-5695

cr + Sunbelt Tractor & Equipment Company, c/o Timothy R. Ploch, P.C., 730 N. Post Oak Rd., Suite 100, Houston, TX 77024-4051

cr + Tammy Childress Cleveland, 2357 County Road 2224, Cleveland, TX 77327-7024

cr + Tanmar Rentals, LLC, c/o Wells & Cuellar, P.C., 440 Louisiana Suite 718, Houston, TX 77002, UNITED STATES 77002-1058

cr + Texas Gold Hydraulics Inc., P.O. Box 4107, Victoria, TX 77903-4107

cr + Texas Taxing Authorities, c/o Tara LeDay, P.O. Box 1269, Round Rock, TX 78680-1269

cr + Titan Towers LP, PO Box 6972, Abilene, TX 79608-6972

cr + Valu industrial/Er Services, LLC, c/o Christian M Sternat, 1111 North Loop West, Suite 1115, Houston, Tx 77008-4700

cr + Western Oilfields Supply Co. d/b/a Rain for Rent, c/o The Gerger Law Firm PLLC, 1770 St. James Pl., Suite 105, Houston, Tx 77056-3441

cr + c/o Gary W. Coker Germer PLLC Mason Construction., P. O. Box 4915, Beaumont, TX 77704-4915

TOTAL: 73

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/Text: receivables@bottomlineequipment.com	Nov 09 2023 20:19:00	Bottom Line Equipment, LLC, P.O. Box 81217, Lafayette, LA 70598-1217
cr	Email/Text: fpdbankruptcynticesgroup@cat.com	Nov 09 2023 20:19:00	Caterpillar Financial Services Corporation, 2120 West End Avenue, Nashville, TN 37023
cr	^ MEBN	Nov 09 2023 20:16:32	Canon Financial Services, Inc., c/o Nicola G. Suglia, Esquire, Fleischer, Fleischer & Suglia, P.C., Four Greentree Centre, 601 Route 73 North, Suite 305, Marlton, NJ 08053-3475
cr	Email/Text: houston_bankruptcy@LGBS.com	Nov 09 2023 20:20:00	Cypress-Fairbanks ISD, Linebarger Goggan Blair

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			& Sampson LLP, C/O Tara L. Grundemeier, P.O. Box 3064, Houston, TX 77253-3064
op	^ MEBN	Nov 09 2023 20:18:02	Epiq Corporate Restructuring, LLC, 777 3rd Avenue, New York, NY 10017-1401
cr	Email/Text: houston_bankruptcy@LGBS.com	Nov 09 2023 20:20:00	Harris County, Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, Post Office Box 3064, Houston, TX 77253-3064
cr	Email/Text: houston_bankruptcy@LGBS.com	Nov 09 2023 20:20:00	Jefferson County, Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, P.O. Box 3064, Houston, TX 77253-3064
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Val Verde County, 112 E. Pecan Street, Suite 2200, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	McMullen County, 112 E. Pecan Street, Suite 2200, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Loving County, 711 Navarro, Ste. 300, San Antonio, Tx 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Ector CAD, 711 Navarro, Ste. 300, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Frio Hospital District, 112 E Pecan Street, Suite 2200, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Dilley ISD, 112 E. Pecan Street, Suite 2200, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Zavala CAD, 112 E. Pecan Street, Suite 2200, San Antonio, TX 78205
cr	Email/Text: sanantonio.bankruptcy@publicans.com	Nov 09 2023 20:19:00	Reeves County, 112 E. Pecan Street, Suite 2200, San Antonio, TX 78205
cr	+ Email/Text: jarrod.martin@chamberlainlaw.com	Nov 09 2023 20:19:00	Messner Contracting Group, LLC, c/o Jarrod B. Martin, Chamberlain Hrdlicka, 1200 Smith Street, Suite 1400, Houston, TX 77002-4496
cr	+ Email/Text: MarcsBankruptcyUnit@michigan.gov	Nov 09 2023 20:20:00	Michigan Department of Treasury, P.O. Box 30754, Lansing, MI 48909-8254
cr	+ Email/Text: lmbkr@pbfc.com	Nov 09 2023 20:19:00	Midland County, c/o Laura J. Monroe, Perdue, Brandon, Fielder, Collins & Mott, PO Box 817, Lubbock, TX 79408-0817
cr	Email/Text: houston_bankruptcy@LGBS.com	Nov 09 2023 20:20:00	Montgomery County, Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, Post Office Box 3064, Houston, TX 77253-3064
cr	+ Email/Text: Austin.Bankruptcy@lgbs.com	Nov 09 2023 20:19:00	Normangee ISD, c/o Diane W. Sanders, Linebarger Goggan Blair & Sampson, LLP, P.O. Box 17428, Austin, TX 78760-7428
cr	+ Email/Text: mbrimage@akingump.com	Nov 09 2023 20:19:00	Official Committee of Unsecured Creditors of Strik, c/o Marty L. Brimage, Jr., Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675
cr	+ Email/Text: schristianson@buchalter.com	Nov 09 2023 20:19:00	Oracle America, Inc., Buchalter, A Professional Corporation, c/o Shawn M. Christianson, 425 Market St., Suite 2900, San Francisco, CA 94105-2491
intp	Email/Text: bcd@oag.texas.gov	Nov 09 2023 20:19:00	Railroad Commission of Texas, c/o Office of the Attorney General, Bankruptcy & Collections Division, P. O. Box 12548, Austin, TX 78711-2548
cr	+ Email/Text: ssoule@hallestill.com	Nov 09 2023 20:20:00	Rock-It Natural Stone, Inc., c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705
cr	Email/Text: lwalpole@semicrawlers.com		

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		Nov 09 2023 20:19:00	Sunbelt Equipment Marketing, Inc., 500 Davenport Drive, College Station, TX 77845
cr	+ Email/Text: Credit@summit.com		
		Nov 09 2023 20:20:00	Summit Electrical Supply Company, Inc., 8718 W. Little York Road, Suite #100, Houston, TX 77040-4154
cr	Email/Text: collections.pacer@twc.texas.gov		
		Nov 09 2023 20:20:00	TEXAS WORKFORCE COMMISSION, REGULATORY INTEGRITY DIVISION - SAU, 101 EAST 15TH STREET, ROOM 556, AUSTIN, TX 78778-0001
cr	+ Email/Text: AGBankRevenue@ag.tn.gov		
		Nov 09 2023 20:19:00	TN Dept of Revenue, c/o TN Atty General's Office, Bankruptcy Division, PO Box 20207, Nashville, TN 37202-4015
cr	^ MEBN		
		Nov 09 2023 20:16:57	Texas Comptroller of Public Accounts, Revenue Acco, Callan C. Searcy, PO Box 12548, Austin, TX 78711-2548
cr	^ MEBN		
		Nov 09 2023 20:16:56	Texas Comptroller of Public Accounts, Revenue Acco, Callan Searcy, PO Box 12548, Austin, TX 78711-2548
cr	+ Email/Text: zfanucchi@ceflegalsa.com		
		Nov 09 2023 20:19:00	Texas First Rentals LLC, c/o Zachary J.Fanucchi, Caldwell East & Finlayson PLLC, 700 N ST MARY'S STREET, SUITE 1825, SAN ANTONIO, TX 78205-3545
cr	+ Email/Text: ssoule@hallestill.com		
		Nov 09 2023 20:20:00	The Williams Companies, Inc., c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705
cr	+ Email/Text: ssoule@hallestill.com		
		Nov 09 2023 20:20:00	Transcontinental Gas Pipe Line Company, c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705
cr	+ Email/Text: beanland@mssattorneys.com		
		Nov 09 2023 20:19:00	United Rentals (North America), Inc., c/o Misti L. Beanland, 8131 LBJ Freeway, Suite 700, Dallas, TX 75251-1352
cr	+ Email/Text: ssoule@hallestill.com		
		Nov 09 2023 20:20:00	Williams Field Services, Inc., c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705
cr	+ Email/Text: ssoule@hallestill.com		
		Nov 09 2023 20:20:00	Williams Ohio Valley Midstream, LLC, c/o Steven W. Soule, Hall, Estill, Hardwick, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3708
cr	+ Email/Text: ssoule@hallestill.com		
		Nov 09 2023 20:20:00	Williams Partners L.P., c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705

TOTAL: 37

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
tr		Patrick Bartels
cr		ACE American Insurance Company
cr		AIPCF VII LLC
cr		Acadian Pipeline Systems
cr		Acuren Inspection, Inc.
intp		Akin Gump Strauss Hauer & Feld LLP
cr		Ardent Services, LLC
cr		Aspen American Insurance Company
cr		BP America Production Company
cr		BP Exploration and Production, Inc.
cr		BP Products North America, Inc.
cr		BPX Midstream LLC
cr		Billy Cleveland

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cr Boyd Company
 cr Brandon & Clark Inc
 cr Brazoria County Tax Office
 cr Brazoria County, et al
 intp Buckeye Partners, L.P., Buckeye Terminals, LLC, Bu
 cr C-Dive, LLC
 cr Clty of Cleburne
 cr Chevron U.S.A. Inc.
 cr Chubb Companies
 cr Circle C Properties of Mississippi, LLC
 cr Circle C Properties, LLC
 cr Claudia Frost
 cr Cleburne ISD
 intp Cleveland Brothers Equipment Co., Inc.
 cr Colorado Department of Revenue
 cr Cyclone Services LLC
 cr DMD Fabrication & Services, Inc.
 cr Dakota Utility Contractors, LLC
 cr Damone N. Eddy as Administrator for the Estate of
 cr Deere Credit, Inc and John Deere Financial, f.s.b
 cr Deere Credit, Inc.
 cr Delta Fuel Services
 cr Diamond G Inspection, Inc
 cr Eagle Capital Corporation
 cr Elite Supply Partners, Inc.
 cr Empire Services, Inc.,
 cr Enbridge Inc.
 cr Energy Transfer LP
 cr Enterprise Crude Pipeline LLC
 cr Enterprise Field Services LLC
 cr Enterprise Pelican Pipeline, L.P.
 cr Enterprise Products Operating LLC
 cr Enterprise Texas Pipeline LLC
 cr Ford Frost
 cr Frederick Robinson
 cr Goliad County
 cr Graybar Electric Company, Inc.
 cr Gulf & Ship Island Railroad, LLC
 cr H&E Equipment Services, Inc., c/o Hicks Law Group PLLC, 325 N. St. Paul Street, Suite 4400, Dallas
 cr Hard Rock Directional Drilling, LLC
 cr Hidalgo County
 cr IDV NPID, LP
 cr Illinois Truck & Equipment Co., Inc.
 cr Industrial Electric Service, Inc.
 cr JPH Holdings, LLC d/b/a JP Services
 cr Jim Wells CAD
 cr Johnson County
 cr Joseph Montie
 cr Kirby-Smith Machinery, Inc., Hicks Law Group PLLC, 325 N. St. Paul Street, Suite 4400, Dallas
 cr Leonides Gonzalez
 cr Magellan GP, LLC
 cr Magellan Midstream Partners, L.P.
 cr Magellan Pipeline Company, L.P.
 cr Magellan Pipeline GP, LLC
 cr Magellan Pipelines Holdings, L.P.
 cr Mears Group, Inc.
 cr Miller Concrete Construction, LLC
 cr NFG Midstream Clermont LLC
 cr National Fuel Gas Distribution Corporation
 cr National Fuel Gas Supply Corporation
 cr Nueces County
 cr Perspective Talent LLC
 cr Phillips 66 Company

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intp		ProGro Environmental, LLC
cr		Ravan, Inc. d/b/a Tru-Tek Drilling and d/b/a Ravan
cr		Sequel Electrical Supply, LLC
cr		South Texas NGL Pipelines, LLC
intp		Speed Technical Services, LLC
cr		Sunbelt Rentals, Inc.
cr		Texas ReExcavation LC
cr		Top Line Rental
cr		Volvo Financial Services, a division of VFS US LLC
intp		W. D. Wright Contracting Inc
cr		WESTCHESTER FIRE INSURANCE COMPANY
cr		Westchester Fire Insurance Company
cr		White Supply, LLC
cr		Wilmington Trust, National Association, as Junior
cr		Woodlands-Sarofim #1 LTD
cr		Yak Mat, LLC
aty	##+	Tech Con Trenching, Inc., Sanderford & Carroll, P.C., 2110 Birdcreek Drive, Temple, TX 76502, UNITED STATES 76502-1020
cr	##+	Komatsu Financial Limited Partnership, c/o Kane Russell Coleman Logan PC, Attn: Demetri J. Economou, 5051 Westheimer, Suite 1000, Houston, TX 77056-5749

TOTAL: 92 Undeliverable, 0 Duplicate, 2 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 11, 2023

Signature: /s/Gustava Winters