

**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)
)

**NOTICE OF TWENTY NINTH OMNIBUS
CLAIMS OBJECTION [DOCKET NO. 1551]**

This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case. You should immediately contact the objecting party to resolve the dispute. If you do not reach an agreement, you must file a response to this objection and send a copy of your response to the objecting party within 30 days after the objection was served on you. Your response must state why the objection is not valid. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

A hearing will be conducted on this matter on April 29, 2024 at 10:00 a.m. prevailing Central Time, in Courtroom 404, 4th floor, 515 Rusk Street, Houston, Texas 77002. You may participate in the hearing either in person or by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 954554. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Isgur's home page. The meeting code is "JudgeIsgur". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Important Information Regarding the Objection

Grounds for the Objection. By the Omnibus Objection, the Debtors or the Liquidating Trustee, as applicable, are seeking to **reduce and/or reclassify** your claim(s) on the grounds that your claim(s) fail to sufficiently specify the asserted claim amount, is incorrectly or improperly classified, is partially satisfied, or seeks recovery of amounts for which the Debtors are not liable.

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>.

The claim(s) subject to the Omnibus Objection may be found on the schedules attached to the Omnibus Objection, a copy of which has been provided with this notice.

Objection Procedures. On March 17, 2022, the United States Bankruptcy Court for the Southern District of Texas (the “Court”) entered an order [Docket No. 867] approving procedures for filing and resolving objections to claims asserted against the Debtors in these chapter 11 cases (the “Objection Procedures”).²

Resolving the Objection

Parties Required to File a Response. If you disagree with the Omnibus Objection filed with respect to your claim, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

Response Contents. Each Response must contain the following (at a minimum):

1. a caption with the name of the Court, the name of the Debtors, the case number, and the title of the objection to which the Response is directed;
2. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection;
3. copies of documentation or other evidence of your claim not previously filed with proof of such claim on which your Response is based (excluding confidential, proprietary, or other protected information, copies of which ***must*** be provided to the counsel to the Liquidating Trustee, subject to appropriate confidentiality constraints, if any); and
4. the following contact information for the responding party:
 1. the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant’s attorney or designated representative to whom the attorneys for the Debtors or the Liquidating Trustee, as applicable, should serve a reply to the Response, if any; or
 2. the name, address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court and served so as to be ***actually received*** by 4:00 p.m. (prevailing Central Time) on April 27, 2024 (the “Response Deadline”).

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors or the Liquidating Trustee, as applicable, resolving the objection to a claim (as described in the Objection Notice), failure to timely file and serve a**

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection Procedures.

Response as set forth herein or to appear at the Hearing may affect your rights and may result in the Court granting the Omnibus Objection without further notice or hearing. Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing on the Objection

Date, Time, and Location. A hearing (the “Hearing”) on the Omnibus Objection will be held on April 29, 2024, at 10:00 a.m. prevailing Central Time, before the Honorable Marvin Isgur, United States Bankruptcy Judge, in Courtroom 404, 515 Rusk, Houston, Texas 77002. The Hearing may be adjourned to a subsequent date in these chapter 11 cases in the Debtors’ or the Liquidating Trustee’s, as applicable, sole discretion and with notice to the affected party. **You must attend the Hearing if you disagree with the Omnibus Objection and have filed a Response.** In the sole discretion of the Debtors or the Liquidating Trustee, as applicable, the initial setting on a contested claim for which (a) a Response is filed in accordance with the proposed response procedures but such Response is not resolved prior to the Hearing, and (b) an appearance is made at the Hearing, may be heard at the Hearing or treated as a status conference provided prior notice is given to the affected parties. If a subsequent hearing is determined to be necessary, the Debtors or the Liquidating Trustee, as applicable, shall file with the Court and serve on the affected claimants a notice of the subsequent hearing (the date of which shall be determined in consultation with the affected claimant(s)) or announce such adjournment on the record.

Discovery. If the Debtors or the Liquidating Trustee, as applicable, determine that discovery is necessary in advance of a Hearing on an Omnibus Objection, the Debtors or the Liquidating Trustee, as applicable, will serve notice on the affected claimant and its counsel of record that the scheduled Hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda for the Hearing, or may be provided by separate notice.

Additional Information

Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings (the “Pleadings”) filed in these chapter 11 cases are available at no cost at the Debtors’ Claims and Noticing Agent’s website <https://dm.epiq11.com/case/strikellc/info>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court’s website at <https://ecf.txsb.uscourts.gov/>. A login identification and password to the Court’s Public Access to Court Electronic Records (“PACER”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.uscourts.gov>. **Please do not contact the Court to discuss the merits of any claim or any objection filed with respect thereto.**

Reservation of Rights

Nothing in any omnibus objection or objection notice is intended or shall be deemed to constitute (a) an admission as to the validity of any prepetition claim against a Debtor entity; (b) a waiver of any right of any Debtor, the Liquidating Trustee, or any other party in interest to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this motion or any order granting the relief requested by this

motion; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of any right of any Debtor, the Liquidating Trustee, or any other party in interest under the Bankruptcy Code or any other applicable law.

Dated: March 28, 2024

Respectfully submitted,

McCLOSKEY ROBERSON WOOLLEY, PLLC

By: /s/ Thomas A. Woolley, III

Timothy M. McCloskey

SBOT: 13417650

tmccloskey@mrwpllc.com

Thomas A. Woolley, III

SBOT: 24042193

rwoolley@mrwpllc.com

Carissa N. Brewster

SBOT: 24122933

cbrewster@mrwpllc.com

190 T.C. Jester Blvd., Suite 400

Houston, Texas 77007

713-337-3900

713-337-3915 (fax)

**ATTORNEYS FOR THE WIND-DOWN DEBTORS
AND THE LIQUIDATING TRUSTEE**

Certificate of Service

I certify that on May 28, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, I caused a copy of the foregoing document and a copy of Docket No. 1551 to be served by First Class Mail to the attached service list.

/s/ Thomas A. Woolley, III

Thomas A. Woolley, III

Service List for Notice of Twenty-Ninth Omnibus Claims Objection

A & A PORTA POTTIES
PO BOX 469
SCOTTSBLUFF, NE 69363

ALL WAYS SAFE LLC
159 S MCDONALD ST
MCDONALD, PA 15057

ALLWASTE INDUSTRIAL SERVICES LLC
C/O PORTER HEDGES LLP
ATTN AARON J POWER
1000 MAIN ST, 36TH FL

BELL SUPPLY COMPANY LLC
C/O DORE ROTHBERG MCKAY PC
17171 PARK ROW, STE 160
HOUSTON, TX 77084

BILL'S SERVICE COMPANY
308 OHIO ST
PO BOX 684
KNOX, PA 16232

CANON FINANCIAL SERVICES INC
C/O FLEISCHER FLEISCHER & SUGLIA PC
601 RTE 73 N, STE 305
MARLTON, NJ 08053

CASTRO, ERIK D
3662 CASTLE RIVER DR
CORPUS CHRISTI, TX 78410

DOUBLE D CONSTRUCTION INC
ATTN DYLAN LAYSER
120 S FT ZELLERS RD
NEWMANSTOWN, PA 17073

HALL'S SAFETY EQUIPMENT CORP
139 GASPER RD, STE A
GROVE CITY, PA 16127-5801

JML MANAGEMENT INC
ATTN MIKE LOUT
748 STATE HWY 7 W
CENTER, TX 75935

MITCHELL WATER SYSTEM INC
PO BOX 70458
TUSCALOOSA, AL 35407-0458

NFL HOLDINGS LP
D/B/A HOUSTON TAXANS
C/O SUNIL JAMAL
TWO NRG PARK
HOUSTON, TX 77054-1573

P&L TESTING LLC
PO BOX 1107
GIDDINGS, TX 78942

PROGRO ENVIRONMENTAL LLC
C/O SPILMAN THOMAS & BATTLE PLLC
ATTN JULIAN E NEISER
301 GRANT ST, STE 3440
PITTSBURGH, PA 15219

ACTION TRUCKING COMPANY
1306 E ANDERSON RD
HOUSTON, TX 77047

BURNETT SPECIALISTS
PO BOX 973940
DALLAS, TX 75397-3940

ILLINOIS DEPARTMENT OF REVENUE
PO BOX 19035
SPRINGFIELD, IL 62794-9035

NORTHEAST GAS SERVICE INC
27 MCDERMOTT PL
BERGENFIELD, NJ 07621

HAYMON, JAMES F
606 CARPENTER RD
WINNFIELD, LA 71483

HI PERFORMANCE CARWASH LLC
PO BOX 777
IGNACIO, CO 81137

HOVIS AUTO & TRUCK SUPPLY INC
1000 CHAMPION DR
MERCER, PA 16137-4016

SIMON CONTRACTORS OF SOUTH
DAKOTA INC
PO BOX 2720
RAPID CITY, SD 57709

SOMERSET WELDING & STEEL INC
10558 SOMERSET PIKE
SOMERSET, PA 15501

US BANK NA
D/B/A US BANK EQUIPMENT FINANCE
1310 MADRID ST
MARSHALL, MN 56258

WOLVERINE MAT LLC
1177 17 MILE RD
CEDAR SPRINGS, MI 49319