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Proposed Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

- ☒ NEVADA COPPER, INC.
- ☒ NEVADA COPPER CORP.
- ☒ NC DITCH COMPANY LLC
- ☒ NC FARMS LLC
- ☒ LION IRON CORP.
- ☒ 0607792 B.C. LTD.

Debtors.¹

Lead Case No.: 24-50566-hlb
 Chapter 11

Jointly Administered with:
 Case No.: 24-50567-hlb
 Case No.: 24-50568-hlb
 Case No.: 24-50569-hlb
 Case No.: 24-50570-hlb
 Case No.: 24-50571-hlb

**DECLARATION OF ALAN D. HOLTZ IN SUPPORT OF
 DEBTORS' APPLICATION FOR ENTRY OF AN ORDER (I) AUTHORIZING
 DEBTORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP
 AS FINANCIAL ADVISOR FOR THE DEBTORS EFFECTIVE AS
OF THE PETITION DATE AND (II) GRANTING RELATED RELIEF**

I, Alan D. Holtz, make this declaration pursuant to 28 U.S.C. § 1746, and state:

1. I am a Partner and Managing Director of AlixPartners, LLP ("*AlixPartners*"),²
 which has a principal place of business at 909 Third Avenue, Floor 30, New York, New York

¹ The Debtors in these chapter 11 cases and the last four digits of their registration numbers in the jurisdiction in which they are organized are: Nevada Copper, Inc. (1157) (Nevada); Nevada Copper Corp. (5323) (British Columbia); 0607792 B.C. Ltd. (2524) (British Columbia); Lion Iron Corp. (2904) (Nevada); NC Farms LLC (0264) (Nevada); and NC Ditch Company LLC (4396) (Nevada).

² Capitalized terms used but not otherwise defined herein have the meanings set forth in the Application.

1 10022.

2 2. I submit this declaration (the “**Declaration**”) on behalf of AlixPartners in support of the
 3 *Debtors’ Application for Entry of an Order (I) Authorizing Debtors to Employ and Retain AlixPartners,*
 4 *LLP as Financial Advisor for the Debtors Effective as of the Petition Date and (II) Granting Related Relief*
 5 (the “**Application**”) filed contemporaneously herewith, by which the Debtors are seeking retention of
 6 AlixPartners on the terms and conditions set forth in the Application and the engagement letter between the
 7 Debtors and AlixPartners attached to the Application as Exhibit 2 (the “**Engagement Letter**”). Except as
 8 otherwise noted,³ I have personal knowledge of the matters set forth herein. If called and sworn as a witness,
 9 I could, and would, testify competently to the matters set forth herein.

10 **AlixPartners’ Qualifications**

11 3. AlixPartners is an internationally recognized restructuring and turnaround firm
 12 with substantial experience in providing financial advisory services and has an excellent reputation
 13 for its work in large and complex chapter 11 cases on behalf of debtors and creditors throughout
 14 the United States. In light of the size and complexity of these Chapter 11 Cases, the Debtors
 15 require a qualified and experienced financial advisor with the resources, capabilities, and
 16 experience of AlixPartners to assist them in taking steps that are crucial to the success of the
 17 Chapter 11 Cases. AlixPartners performs critical services that complement the services provided
 18 by the Debtors’ other professionals.

19 4. AlixPartners has assisted, advised, and provided strategic advice to debtors,
 20 creditors, bondholders, investors, and other entities in numerous chapter 11 cases of similar size
 21 and complexity to these Chapter 11 Cases. Its professionals have provided restructuring or crisis
 22 management services in numerous large cases. *See, e.g., In re ConvergeOne Holdings, Inc.*, No.
 23 24-90194 (CML) (Bankr. S.D. Tex. May 10, 2024); *In re RobertShaw US Holding Corp.*, No. 24-
 24 90052 (CML) (Bankr. S.D. Tex. Mar. 22, 2024); *In re NanoString Techs., Inc.*, No. 24-10160
 25 (CTG) (Bankr. D. Del. Mar. 13, 2024); *In re Cano Health, Inc.*, No. 24-10164 (KBO) (Bankr. D.

26
 27 ³ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at
 28 AlixPartners and are based on information provided by them.

Del. Mar. 5, 2024); *In re Inversiones Latin America Power Ltda.*, No. 23-11891 (JPM) (Bankr. S.D.N.Y. Jan. 3, 2024); *In re Mallinckrodt plc*, No. 23-11258 (JTD) (Bankr. D. Del. Oct. 2, 2023); *In re KDC Agribusiness LLC*, No. 23-10786 (CTG) (Bankr. D. Del. Jul. 18, 2023); *In re Diamond Sports Grp., Inc.*, No. 23-90116 (CML) (Bankr. S.D. Tex. May 3, 2023); *In re Party City Holdco Inc.*, No. 23-90005 (MI) (Bankr. S.D. Tex. Feb. 21, 2023); *In re Core Scientific, Inc.*, No. 22-90341 (CML) (Bankr. S.D. Tex. Feb. 8, 2023); *In re Clovis Oncology, Inc.*, No. 22-11292 (JKS) (Bankr. D. Del. Jan. 20, 2023); *In re FTX Trading Ltd.*, No. 22-11068 (JTD) (Bankr. D. Del. Jan. 20, 2023); *In re Phoenix Services Topco, LLC*, No. 22-10906 (MFW) (Bankr. D. Del. Oct. 25, 2022); *In re Kabbage Inc. d/b/a KServicing*, No. 22-10951 (CTG) (Bankr. D. Del. Oct. 21, 2022); *In re Lumileds Holding B.V.*, No. 22-1115 (LGB) (Bankr. S.D.N.Y. Oct. 13, 2022); *In re Carestream Health, Inc.*, No. 22-10778 (JKS) (Bankr. D. Del. Oct. 7, 2022); *In re MD Helicopters, Inc.*, No. 22-10263 (KBO) (Bankr. D. Del. Apr. 25, 2022); *In re Alto Maipo Delaware LLC*, No. 21-11507 (KBO) (Bankr. D. Del. Dec. 16, 2021); *In re Riverbed Tech., Inc.*, No. 21-11503 (CTG) (Bankr. D. Del. Dec. 8, 2021); *In re Alpha Latam Mgmt., LLC*, No. 21-11109 (JKS) (Bankr. D. Del. Sept. 15, 2021); *In re Nine Point Energy, LLC*, No. 21-10570 (MFW) (Bankr. D. Del. Apr. 20, 2021); *In re HighPoint Res. Corp.*, No. 21-10565 (CSS) (Bankr. D. Del. Apr. 13, 2021); *In re Mallinckrodt plc*, No. 20-12522 (JTD) (Bankr. D. Del. Nov. 19, 2020); *In re RGN-Grp. Holdings, LLC*, No. 20-11961 (BLS) (Bankr. D. Del. Sept. 15, 2020); *In re Skillsoft Corp.*, No. 20-11532 (MFW) (Bankr. D. Del. July 23, 2020); *In re Celadon Grp., Inc.*, No. 19-12606 (KBO) (Bankr. D. Del. Jan. 3, 2020).

5. If the Application is approved, the individuals working on this matter (the “*AlixPartners Personnel*”), all with substantial expertise in the areas discussed above, will continue to provide necessary services to the Debtors. Such personnel will work closely with the Debtors’ management and other professionals throughout the reorganization process. By virtue of the expertise of its restructuring personnel and the significant prepetition work that AlixPartners performed for the Debtors, AlixPartners is well-qualified to provide services to and represent the

Debtors' interests in these Chapter 11 Cases.

Services to be Provided

6. Prior to the Petition Date, the Debtors and AlixPartners entered into the Engagement Letter, which governs the relationship between them. The terms and conditions of the Engagement Letter were negotiated between the Debtors and AlixPartners and reflect the parties' mutual agreement as to the substantial efforts that will be required in this engagement. Subject to further order of the Court, AlixPartners may provide the services described in the Engagement Letter as AlixPartners and the Debtors shall deem appropriate and feasible in order to advise the Debtors in the course of these Chapter 11 Cases, including, but not limited to, the following:

- (a) Assist with the preparation for a Chapter 11 filing, including first day motions and affidavits, as well as the accounting cutoff procedures.
- (b) Prepare budgets and cash forecasts and evaluate variances thereto, as required by the Debtors' lenders and/or orders of the Court.
- (c) Assist with liquidity management, including negotiation of vendor terms.
- (d) Assist with business planning and related financial modeling.
- (e) Assist with diligence requests of the various creditor constituencies.
- (f) Assist with preparation of motions to be filed with the Court or the Debtors' response to motions filed by other parties-in-interest.
- (g) Assist with the design, negotiation and implementation of a restructuring strategy, which could include asset sales.
- (h) Assist the Debtors and their investment banker with the asset sale process.
- (i) Prepare the statements of financial affairs, schedules of assets and liabilities, monthly operating reports and other information required by the Court, as well as assist with a disclosure statement and plan of reorganization, if applicable.
- (j) Assist with management of the claims reconciliation process.
- (k) Provide testimony before the Court on matters that are within the scope of this engagement and within AlixPartners' area of testimonial competencies, if

applicable.

- (l) Assist the Debtors with such other matters as may be requested that fall within AlixPartners' expertise and that are mutually agreeable.

7. Such financial advisory services are necessary to the Debtors' restructuring efforts and in the ongoing operation and management of the Debtors' businesses while subject to chapter 11 of the Bankruptcy Code.

8. When necessary, the AlixPartners Personnel will be assisted by or replaced by various professionals at various levels.

No Duplication of Services

9. AlixPartners understands that the Debtors may retain additional professionals during the term of its engagement and will work cooperatively with such professionals to integrate any respective work conducted by the professionals on behalf of the Debtors. The services provided by AlixPartners will complement, and not duplicate, the services to be rendered by any other professional retained in these Chapter 11 Cases.

Fee and Expense Structure

10. AlixPartners' decision to accept this engagement to provide services to the Debtors is conditioned upon its ability to be retained in accordance with its customary terms and conditions of employment, compensated for its services, and reimbursed for the out-of-pocket expenses it incurs in accordance with its customary billing practices, as set forth in **Schedule 1** of the Engagement Letter (the "***Fee and Expense Structure***").

11. AlixPartners' current standard hourly rates, subject to periodic adjustments, are as follows:

Title	Hourly Rate
Partner & Managing Director	\$1,225 – \$1,495
Partner	\$1,200
Director	\$960 – \$1,125

Senior Vice President	\$800 – \$910
Vice President	\$640 – \$790
Consultant	\$230 – \$625

12. Effective as of July 1, 2024, AlixPartners’ standard hourly rates will be as follows:

Title	Hourly Rate
Partner/ Partner & Managing Director	\$1,200 – \$1,495
Senior Vice President/ Director	\$825 – \$1,125
Vice President	\$640 – \$810
Consultant	\$230 – \$625

13. AlixPartners generally reviews and revises its billing rates semi-annually. Changes in applicable hourly rates will be noted on the invoices for the first time period in which the revised rates become effective.

14. To the extent the Debtors request services related to electronic discovery and data collection, certain monthly hosting fees and consulting fees will apply.

15. To the extent AlixPartners uses the services of independent contractors (the “*Contractors*”) in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

16. In addition to compensation for services rendered by the AlixPartners Personnel, AlixPartners will seek reimbursement for reasonable and necessary expenses incurred in connection with these Chapter 11 Cases, including, but not limited to, transportation costs, lodging, and meals.

17. AlixPartners intends to apply for compensation for professional services rendered

1 and reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the
2 Court's approval and in compliance with *U.S. Trustee Guidelines for Reviewing Applications for*
3 *Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (Appendix A to 28
4 C.F.R. § 58), applicable provisions of the Bankruptcy Code, including sections 330 and 331 of the
5 Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and any other further orders
6 of the Court, both in connection with this Application and the interim and final fee applications to
7 be filed by AlixPartners in these Chapter 11 Cases.

8 18. AlixPartners will maintain records in support of any fees (in 1/10th of an hour
9 increments), costs, and expenses incurred in connection with services rendered in these Chapter
10 11 Cases. Records will be arranged by category and nature of the services rendered and will
11 include reasonably detailed descriptions of those services provided on behalf of the Debtors.

12 19. AlixPartners often works for compensation that includes hourly-based fees and
13 performance-based, contingent-incentive compensation earned upon achieving meaningful results.
14 AlixPartners does not currently request a success fee in connection with these Chapter 11 Cases.

15 20. AlixPartners received a retainer in the amount of \$300,000 from the Debtors (the
16 "**Retainer**"). According to AlixPartners' books and records, during the 90-day period prior to the
17 Petition Date, the Debtors paid AlixPartners \$710,381.00 in aggregate for professional services
18 performed and expenses incurred, including the Retainer.

19 21. AlixPartners is requesting that any balance of the Retainer constitute an evergreen
20 retainer as security for post-petition services and expenses. An evergreen retainer is appropriate
21 in these Chapter 11 Cases because it reflects normal business terms in the marketplace and because
22 AlixPartners and the Debtors are sophisticated business entities that have negotiated the Retainer
23 at arm's length.

24 22. Due to the ordinary course and unavoidable reconciliation of fees and submission
25 of expenses immediately prior, and subsequent to, the Petition Date, AlixPartners may have
26 incurred fees and reimbursable expenses related to the prepetition period which remain unpaid.
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1 Approval is sought from this Court for AlixPartners to apply the Retainer to these unpaid amounts.
2 Upon entry of an order approving the relief requested in the Application, AlixPartners will apply
3 the Retainer to the unpaid amounts, and the Debtors will not owe AlixPartners any sums for
4 prepetition services.

5 **Indemnification Provisions**

6 23. The Engagement Letter contains standard indemnification language with respect to
7 AlixPartners' services including, without limitation, an agreement by the Debtors to indemnify
8 AlixPartners and its affiliates, partners, directors, officers, employees, and agents (each, an
9 "*AlixPartners Party*" and collectively, the "*AlixPartners Parties*") from and against all claims,
10 liabilities, losses, expenses, and damages arising out of or in connection with the engagement of
11 AlixPartners that is the subject of the Engagement Letter, except to the extent caused by gross
12 negligence, bad faith, fraud, or willful misconduct of any AlixPartners Party.

13 24. AlixPartners believes that the indemnification provisions contained in the
14 Engagement Letter, as may be amended in the Proposed Order, are customary and reasonable for
15 AlixPartners and comparable firms providing financial advisory services, and as would be
16 modified pursuant to the foregoing limitations.

17 25. Moreover, the terms and conditions of the indemnification provisions were
18 negotiated by the Debtors and AlixPartners at arm's length and in good faith. The provisions
19 contained in the Engagement Letter, viewed in conjunction with the other terms of AlixPartners'
20 proposed retention, are reasonable and in the best interest of the Debtors, their estates, and all
21 parties in interest in light of the fact that the Debtors require AlixPartners' services to ensure the
22 success of these Chapter 11 Cases.

23 **AlixPartners' Disinterestedness**

24 26. In connection with its proposed retention by the Debtors in these Chapter 11 Cases,
25 AlixPartners undertook a complex process, the details of which are set forth in **Schedule 2**, to
26 determine whether it had any conflicts or other relationships that might cause it not to be
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disinterested or to hold or represent an interest adverse to the Debtors' estates. Specifically, AlixPartners obtained from the Debtors and/or their representatives a potential parties in interest list in these Chapter 11 Cases (each party a "***Party in Interest***", and collectively the "***Parties in Interest List***"). The Parties in Interest List is attached hereto as **Schedule 1**. A search was performed for connections to each Party in Interest as to AlixPartners Holdings, LLP, AlixPartners' parent company ("***Holdings***"), and each of Holdings' U.S. and non-U.S. subsidiaries ("***Holdings Enterprise***", collectively "***AP***"). Results for connections to the Parties in Interest List are disclosed on **Schedule 2**.

27. Based on that review, AlixPartners represents that, to the best of its knowledge, AlixPartners knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested, or hold or represent an interest adverse to the Debtors' estates.

28. AlixPartners and its affiliates are advisors and crisis managers providing services and advice in many areas, including restructuring and distressed debt. As part of its diverse practice, AlixPartners appears in numerous cases, proceedings, and transactions involving many different law firms, accountants, investment bankers, and financial consultants, some of whom may represent claimants and parties in interest in these Chapter 11 Cases. Further, AlixPartners has in the past, and may in the future, be represented by various attorneys and law firms, some of whom may be involved in these Chapter 11 Cases. In addition, AlixPartners has been in the past, and likely will be in the future, engaged in matters unrelated to the Debtors or these Chapter 11 Cases in which it works with or in opposition to other professionals involved in these Chapter 11 Cases. Moreover, AlixPartners might have referred work to other professionals retained in these Chapter 11 Cases. Likewise, professionals retained in these Chapter 11 Cases might have referred work to AlixPartners. To the best of my knowledge, information, and belief, insofar as I have been able to ascertain after reasonable inquiry, none of these business relationships constitute interests adverse to the Debtors' estates.

29. From time to time, AlixPartners has provided services, and likely will continue to

1 provide services, to certain creditors of the Debtors and various other parties adverse to the Debtors
2 in matters wholly unrelated to these Chapter 11 Cases. As described herein, however, AlixPartners
3 has undertaken a detailed search to determine, and to disclose, whether it is providing or has
4 provided services to any significant creditor, equity security holder, insider, or other party in
5 interest in such unrelated matters.

6 30. To the best of my knowledge, information, and belief, insofar as I have been able
7 to ascertain after reasonable inquiry, none of the AlixPartners Personnel (a) have any connection
8 with the United States Trustee for the District of Nevada (the “*U.S. Trustee*”), or any employee in
9 the Office of the U.S. Trustee; or (b) are related or connected to any United States Bankruptcy
10 Judge for the District of Nevada, except as otherwise set forth **Schedule 2**.

11 31. To the best of my knowledge, neither the AlixPartners Personnel nor AP is a direct
12 holder of any of the Debtors’ securities. It is possible that certain of AlixPartners’ employees,
13 managing directors, board members, equity holders, or an affiliate of any of the foregoing, may
14 own interests in the Debtors, mutual funds or other investment vehicles (including various types
15 of private funds) that own the Debtors’ or other parties in interest’s debt or equity securities or
16 other financial instruments, including bank loans and other obligations. Typically, the holders of
17 indirect interests have no control over investment decisions related to such investment funds or
18 financial instruments. Per the procedures set forth in **Schedule 1**, AlixPartners makes certain
19 inquiries regarding direct interests and, to the extent required, will file a supplemental declaration
20 reflecting additional details. AlixPartners’ policy prohibits its employees from personally trading
21 in the Debtors’ securities.

22 32. To the best of my knowledge, information and belief, insofar as I have been able to
23 ascertain after reasonable inquiry, AlixPartners has not been retained to assist any entity or person
24 other than the Debtors on matters relating to, or in direct connection with, these Chapter 11 Cases.

25 33. Certain of AlixPartners’ employees, managing directors, board members, equity
26 holders, or an affiliate of any of the foregoing may have financial accounts or insurance
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1 relationships with a potential party in interest.

2 34. Despite the efforts described above to identify and disclose the connections that AP
3 and its affiliates have with parties in interest in these Chapter 11 Cases, because the Debtors form
4 a large enterprise with numerous creditors and other relationships, AlixPartners is unable to state
5 with certainty that every client relationship or other connection has been identified and disclosed.

6 35. In accordance with section 504 of the Bankruptcy Code and Bankruptcy Rule 2016,
7 neither I nor AlixPartners has entered into any agreements, express or implied, with any other party
8 in interest, including the Debtors, any creditor, or any attorney for such party in interest in these
9 Chapter 11 Cases, (a) for the purpose of sharing or fixing fees or other compensation to be paid to
10 any such party in interest or its attorneys for services rendered in connection therewith, (b) for
11 payment of such compensation from the assets of the estates in excess of the compensation allowed
12 by the Court pursuant to the applicable provisions of the Bankruptcy Code, or (c) for payment of
13 compensation in connection with these Chapter 11 Cases other than in accordance with the
14 applicable provisions of the Bankruptcy Code.

15 36. Accordingly, except as otherwise set forth herein, insofar as I have been able to
16 determine, neither I, AlixPartners, nor any of the AlixPartners Personnel hold or represent any
17 interest adverse to the Debtors or their estates, and AlixPartners is a “disinterested person” as that
18 term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the
19 Bankruptcy Code, in that AlixPartners and the AlixPartners Personnel:

- 20 (a) are not creditors, equity security holders, or insiders of the Debtors;
21 (b) were not, within two years before the Petition Date, a director, officer or
22 employee of the Debtors; and
23 (c) do not have an interest materially adverse to the interest of the Debtors’ estates
24 or any class of creditors or equity security holders, by reason of any direct or
25 indirect relationship to, connection with, or interest in, the Debtors, or for any
26 other reason.

27 37. If AlixPartners discovers additional information that requires disclosure,
28 AlixPartners will promptly file a supplemental disclosure with the Court as required by Bankruptcy

1 Rule 2014. AlixPartners reserves the right to supplement this Declaration in the event that
2 AlixPartners discovers any facts bearing on matters described in this Declaration regarding
3 AlixPartners' employment by the Debtors.

4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
5 and correct to the best of my knowledge and belief.

6 Dated: June 25, 2024

7 ALIXPARTNERS, LLP

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9 By: /s/ Alan D. Holtz
Alan D. Holtz
10 Partner & Managing Director
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SCHEDULE 1

Potential Parties in Interest

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Debtors

Nevada Copper Corp.
Nevada Copper, Inc.
0607792 B.C. Ltd.
Lion Iron Corp.
NC Farms LLC
NC Ditch Company LLC

Shareholders

Alexander Hall
Cassandra Joseph Tr Cassandra Joseph Family Trust UA 5/16/2016
CDS & Co
Exchanges Control For C01/C
Jennifer Hall
Kalidas Madhavpeddi
Mercuria Holdings (Singapore) Pte Ltd
Pala Investments Limited
Pala Assets Holding Limited
Pelham Investment Partners LP
Phillip Day
Sedgman USA Inc
Summit Partners Credit Advisors LP

Debtors' Bankruptcy Professionals

Allen Overy Shearman Sterling US LLP
AlixPartners, LLP
Citigroup Global Markets Inc.
Epiq Corporate Restructuring, LLC
McDonald Carano LLP
Moelis & Company
Torys LLP

Other Professionals

Davison Van Cleve, P.C.
Hartwell Thalacker, Ltd.
Jackson Kelly PLLC
Miller Thomson LLP
Vedder Price

Directors and Officers

Anna Ladd-Kruger
Carolyn "Lina" Tanner
Cassandra Joseph
Clare Devincenzi
Elaine Dorward-King
Elva Gonzalez
Ernest (Ernie) Nutter
Evgenij Iorich
Greg French
Greg Martin
Guillaume de Dardel
John Cash
John Nagulendran

1 Kalidas Madhavpeddi
 Kate Southwell
 2 Lucio Genovese
 Matthew Anderson
 3 Michael Brown
 Michael Hassler
 Patrick Gormen
 4 Phillip "Kris" Sims
 Raffaele (Lucio) Genovese
 5 Randy Buffington
 Rod Redden
 6 Sheldon Vanderkooy
 Stephen Gill
 7 Tom Albanese

8 **Secured Creditors**

9 Concord Resources Limited
 Elliott Investment Management
 KfW IPEX-Bank GmbH
 10 Manchester Securities Corp.
 Mercuria Energy Trading
 11 Mercuria Investments US, Inc.
 NIU Invest SE
 12 Pala Investments Limited
 TF R&S Canada Ltd.
 13 Triple Flag International Ltd.
 Triple Flag Mining Finance Bermuda, Ltd.
 14 Triple Flag USA Royalties Ltd.
 U.S. Bank Trust Company, National Association
 15 Ziwa Investments Limited

16 **Unsecured Creditors**

17 Automatic Welding Inc.
 Brake Supply Company Inc
 18 C&B Pumps & Compressors, LLC
 Chlumsky, Armbrust & Meyer, LLC
 Computershare
 19 Cripps Leadership Advisors Ltd
 Desert Ready Mix, LLC
 20 DMI Digital Media Innovations Canada, Inc
 Dorsey & Whitney LLP
 21 F & H Mine Supply, Inc.
 First Insurance Funding (a division of Lake Forest Bank & Trust Company)
 22 FLSmidth
 Hugessen Consulting
 23 Kimball MidWest
 Kool-IP Solutions Corp.
 24 Maddox Industrial Transformer, LLC
 McInnes Cooper
 25 ME Global
 Mercuria Investments US, Inc.
 26 Mill Man Steel, Inc.
 Pala Investments Limited
 27

Partners in Performance USA Inc.
 Prepaid Expense Card Solutions, Inc.
 PricewaterhouseCoopers LLP
 Proactive Investors North American Inc
 Rain For Rent
 Southern Tire Mart, LLC
 Southwest Energy LLC
 Thiessen Team USA, Inc.
 Tom Albanese
 Triple Flag International Ltd.
 Turnstone Industrial Solutions LLC
 Union Pacific Railroad Company
 Wedco Inc.
 Workiva Inc.

Creditor Professionals

Akin Gump Strauss Hauer & Feld
 Bennett Jones LLP
 Cleary, Gottlieb, Steen & Hamilton LLP
 Davis, Graham & Stubbs LLP
 Milbank LLP
 Shea Larson PC
 White & Case LLP

Depository Banks

BMO Harris Bank
 Bank of Montreal/Banque De Montreal

Contract Counterparties

Adobe Inc.
 Allied Sanitation Services
 Alpesh Surati
 Arimex Industrial
 Atkinson Construction LLC
 Barr Engineering
 BESTECH Canada Limited
 Boart Longyear
 Carwil
 CGK Consulting Inc.
 Cheek Construction LLC
 Deswik USA Inc.
 Dusenbury Environmental Services
 Evolve Security
 FKC Lakeshore Inc.
 Fort Lowell Consulting
 Graymar Environmental Service, Inc.
 GroundHog Apps
 Haley & Aldrich
 Haley & Aldrich, Inc.
 Halo Service Solutions
 ICM Solutions, LLC
 Jim Menesini Petroleum
 JW Welding Supplies & Tools

1 Konica Minolta Premiere Finance
 Kool-IP
 2 Layne Minerals LLC
 Major Drilling America Inc.
 McGinley & Associates
 3 Millcreek Engineering Company
 MyComply
 4 Nevada Cement Company Inc.
 Next Level Internet Inc
 5 NOREX Inc.
 Pacific Office Automation
 6 Paterson & Cooke
 Platoro Mine Consulting LLC
 7 Preferred Networks Inc.
 Quality Scales Unlimited
 8 R & M Security
 Redi Services LLC
 9 RGGS Land & Minerals Ltd.
 Robert Half
 10 Robison Engineering Company Inc.
 Rocky Mountain Railcar Repair
 11 Rough Stock Mining LLC
 Sierra Rentals and Transport
 12 Sierra Staffing Group LLC
 Southwest Energy
 13 SRK Consulting Inc
 Steve Newman
 14 Subterranean Boring Inc
 Teresa Thom
 15 ThermoFisher Scientific
 Thomas Gallaway Corp d/b/a Technologist
 16 Tori Martinez
 Velosio
 17 Walker River Mechanical Corporation
 Westland Resources
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Insurance Providers

19 AIG Specialty Insurance Co
 Allied World Specialty Insurance Company
 20 Apollo Syndicate Management Limited
 Aspen Insurance
 21 Banyan Risk Services Ltd.
 Beazley
 22 Berkshire Hathaway Specialty Insurance Company
 Canopus/Amlin
 23 Chubb Insurance Company of Canada
 CNA Canada
 24 CNA Hardy
 Continental Casualty Company
 25 Definity
 FastTrack
 26 First Insurance Funding Corp.
 First Insurance Funding of Canada
 27
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1 General Star Indemnity Company
 Great American Insurance Group (GAIG)
 Inigo Insurance
 2 Intact Insurance Company
 International Mining Industry Underwriters (IMIUI)
 3 Lloyd's Insurance Company
 LP Insurance Services, LLC
 4 Markel Canada Limited
 Marsh Canada Limited
 5 Munich Reinsurance America, Inc.
 QBE Insurance
 6 Redwood Fire and Casualty Insurance Company
 Starr Indemnity & Liability Co
 7 Swiss Reinsurance America Corp
 The Economical Insurance Group
 8 Zurich Insurance Company Ltd

9 **Benefit Providers**

ADP Canada Co. Payroll Technologies
 10 American Specialty Health Incorporated (ASH) d/b/a Active&Fit Direct
 Berkley Industrial Comp. d/b/a Carolina Casualty Insurance Company
 11 CIGNA
 Colonial Insurance
 12 Ginger
 Happify
 13 Humana Insurance Co.
 IMG's Travel Assistance Services
 14 iPrevail
 MacLean Financial Group
 15 MD Live
 Nationwide
 16 Navia Benefit Solutions
 PayChex
 17 Paylogix f/b/o Nationwide
 Prudential Insurance Company of America
 18 QUILITY Insurance Services
 Regional Emergency Medical Services Authority (REMSA)
 19 Reliance Standard Life Insurance
 SamCore Inc.
 20 Talk Space
 Victor Insurance Managers Inc.
 21 Virgin Pulse
 WorkingAdvantage, an EBG Platform
 22 WorkSafeBC

23 **Utility Providers**

Allied Sanitation & Septic Services
 24 Charter Communications
 City of Alhambra Utilities Dept.
 25 D&S Waste Removal, Inc.
 Frontier Communications Parent, Inc.
 26 H2O-4-U Potable Water Services, LLC
 27 NV Energy
 28

1 Rango
2 Sky Fiber Internet
3 Southwest Gas Corporation
4 Sparkletts & Sierra - Alhambra
5 Starlink.com
6 Waste Management of Nevada

7 **Suppliers/Vendors**

8 Cashman Equipment Company
9 Caterpillar Financial SARL
10 Dumas Contracting LTD.
11 Epiroc Financial Solutions USA LLC
12 Epiroc USA LLC
13 Guy F. Atkinson Construction, LLC
14 Jennmar Corporation of Utah. Inc.
15 Jim Menesini Petroleum Products
16 NewField Companies, LLC
17 RAM Enterprises
18 Redpath USA Corporation
19 Small Mine Development LLC
20 Western Nevada Supply

21 **Sureties**

22 Aon
23 Nevada Division of Environmental Protection (Reclamation)
24 Sierra Pacific Power Company d/b/a NV Energy
25 Trisura Insurance Company
26 United States Department of the Interior Bureau of Land Management

27 **Customers**

28 Aurubis AG
Aurubis Bulgaria AD

Royalty Recipients

RGGS Land & Minerals Ltd.
Majuba Mining Ltd.
Renegade Resources Corporation

Equipment Lessors

CAT Financial
CIT Group/Equipment Financing, Inc.
CIT Railcar Funding Company, LLC
Epiroc Financial Solutions
Mine Hoist International Ltd
Normet Americas

Taxing Authorities

Canada Revenue Agency
Internal Revenue Service
Lyon County Treasurer
Mineral County Treasurer
Minister of Finance
Nevada Department of Taxation

1 Nevada State Treasurer
 2 Storey County Business Licensing
 3 Storey County Treasurer
 4 United States Treasury
 5 Washoe County Treasurer

6 **Temporary Labor/Staffing Agencies**

7 ERP Automated LLC
 8 Fort Lowell Consulting PLLC
 9 Kapra Cleaning LLC.
 10 Lynx Enterprise LLC
 11 Manpower
 12 R and M Security LLC
 13 TJA Consulting LLC
 14 XRT Consultants LLC

15 **Other Lienholders**

16 Amalgamated Mining & Tunnelling Inc.
 17 AMC USA LLC
 18 American Assay Laboratories
 19 American Equipment, Inc.
 20 Atlas Copco Customer Finance USA LLC
 21 Barr Engineering Co.
 22 Boart Longyear Company
 23 BrandSafway Services LLC
 24 CarWil, LLC
 25 CIT Bank, N.A.
 26 Davidson Sales & Engineering, Inc.
 27 Double Down Heavy Repair LLC
 28 Durus Industrial, LLC
 Ecofab Maintenance USD Inc
 Expt1 Ltd., A Company Organized Under The Laws of The Cayman Islands
 GM Financial
 Hoffman Manufacturing Inc.
 Idaho Mine Technicians, LLC
 Jodouin Mine Ventilation LTD
 Kaman Industrial Technologies Corporation
 Kelley Freight Brokers
 Komatsu Equipment Co.
 Lhoist North America of Arizona
 Maxim Crane Works LP
 Mine Hoists International LTD
 NFS Leasing, Inc.
 Normet Americas Inc.
 Northern Nevada Equipment
 Paterson & Cooke Canada Inc.
 PDM Steel Service Centers, Inc.
 Peoples United Bank
 Purcell Tire & Rubber Company
 Rema Tip Top/North America Inc
 Respec Company, LLC
 Responsible Mining Solutions

1 RGGGS Land & Minerals. Ltd., L.P.
 Rubicon Mechanical LLC
 2 Saia LTL Freight
 Savage Services Corporation
 Somerset Leasing Xxv, LLC
 3 SunBelt Rentals Inc
 Tech-Flow, LLC
 4 Techline Services Inc
 TFORCE Freight, Inc.
 5 Total Quality Logistics, LLC
 WebBank
 6 Wesco
 Wild West Chevrolet
 7 Williams Scotsman, Inc.

8 **Environmental/Regulatory**

9 NDEP-BMRR
 NDEP-BWPC
 NevDCNR
 10 Nevada Department of Wildlife
 State of Nevada - Div. of H2O Resources
 11 Bureau of Safe Drinking Water
 NDEP - BAPC
 12 Nevada Mining Association
 Oak Valley Hospital District
 13 South Lyon Medical Center
 Walker River Irrigation District
 14

15 **Other Governmental Authorities/Agencies**

16 Alberta Securities Commission
 British Columbia Securities Commission
 17 Bureau of Alcohol, Tobacco,
 Bureau of Safe Drinking Water (BSDW)
 Canada Deposit Insurance Corporation (CDIC)
 18 City of Reno
 City of Yerington
 Department of Homeland Security
 19 Department of Interior - BLM
 Department of Motor Vehicles
 20 Federal Communications Commission
 Federal Deposit Insurance Corporation (FDIC)
 21 International Accounting Standards Board
 International Finance Corporation (IFC)
 22 Lyon County Fair and Rodeo
 Lyon County Recorder
 23 Mason Valley Fire Protection
 Mineral County Assessor
 24 Mineral County Building Department
 Mineral County Recorder
 25 Nevada Department of Wildlife (NDOW)
 Nevada Division of Environmental Protection (NDEP) - BAPC
 26 Nevada Division of Environmental Protection (NDEP) - BMRR
 Nevada Division of Environmental Protection (NDEP) - BSMM
 27
 28

Nevada Division of Environmental Protection (NDEP) - BWPC
 Nevada Mining Association
 Nevada Secretary of State
 Nevada State Fire Marshall
 Nevada State Health Division
 NevDCNR
 Northern Nevada Development Authority
 Oak Valley Hospital District
 Office of the United States Attorney for the District of Nevada
 Ontario Securities Commission
 Ontario Superior Court of Justice
 State of Nevada
 State of Nevada - Dept of Ag
 State of Nevada - Div. of H2O Resources
 System for Electronic Document Analysis and Retrieval (SEDAR)
 Toronto Stock Exchange (TSX)
 US Department of Treasury - MSHA
 Walker River Irrigation District

Region 17 U.S. Trustee and Personnel

Alisa Wongvasinkul
 Anabel Abad-Santos
 Anita Benson
 Avis J. Rhinehart
 Bryan Coleman
 Cameron Gulden
 Carla K. Cordero
 Carlos Hernandez-Vivoni
 Cecilia Jimenez
 Christina Goebelsmann
 Deanna K Hazelton
 Edmund Gee
 Edward M. McDonald
 Gregory Powell
 Ivy Cones
 Jared A. Day
 Jason Blumberg
 Jay Chien
 Joni Brun
 Jorge A. Gaitan
 Justin C. Valencia
 Katina Umpierre
 Keith Swanson
 Kristin McAbee
 Kristine Kinne
 Lamar Lewis-Sutton
 Laurie Brugger
 Lisa M. Grootendorst
 Michael Fletcher
 Michael Mitchell
 Michelle Forrest
 Monette Semana
 Paul Leahy

1 Reinhard Freimuth
Shane Bharat
2 Sue Wolny
Terri Didion
3 Tracy Hope Davis
Trevor Fehr

4 **District of Nevada Bankruptcy Court Judges**

August B. Landis
5 Gary A. Spraker
Gregg W. Zive
6 Hilary L. Barnes
Mike K. Nakagawa
7 Natalie M. Cox

8 **Other Parties in Interest**

Aaron Lopez
9 AccuWeather Enterprise Solutions
acQuire Technology Solutions
10 Adam King
Advanced Weighing Systems LLC
11 Agilent Technologies, Inc.
Agru America, Inc.
12 AHern Rentals, Inc.
Aikenhead Physical Therapy, LLC
13 Alan Rogelio Pineda-Chavez
Aletek LLC
14 Alvarez & Marsal Canada Inc.
Amazon.com
15 American Drilling Corp LLC
American Group, LLC
16 Analytics-Shop USA LP
Anthony O. Lopez
17 Anthony T. Reviglio
Aon Reed Stenhouse Inc.
18 Applied Industrial Technologies, Inc.
ARC WorkPlace Services
19 Associated Pension Consultants, LLC
Atlas Electric Inc
20 Audiology Consulting and Training
Azteca Consulting, LLC
21 Bentley Systems, Inc
Berkley Industrial Comp.
22 Berkshire Hathaway Homestate Insurance Co
Big Iron Rents and Sales, Inc
23 Bittersweet NC LLC
Brenner-Fiedler & Associates, Inc
24 Brian Groom
Bryce Roe
25 BTE West
Burt Process Equipment, Inc.
26 C.C. Jensen, Inc.
C.H. Spencer & Company
27

1 Call & Nicholas, Inc.
2 Capurro Trucking
3 CDW Direct LLC
4 Centennial Equipment Co., Inc.
5 CGK Consulting Group, Inc
6 CGS, Inc.
7 Chuck Pollard
8 Cisco Air Systems
9 Codale Electric Supply, Inc.
10 Coeur Products LTD INC
11 Colton Honnold
12 Compressor-Pump & Services, Inc.
13 Comstock Seed
14 CraneTech, Inc.
15 Crescent Electric
16 Cyclone Transport LLC
17 D. Isom Mobile Glass & Isom Crane
18 David Anthony Coelho
19 De Lage Landen Financial Services, Inc
20 DEA Incorporated
21 Desert Engineering
22 Dominic Carvelas
23 Doug Cleland
24 DSV Air & Sea, Inc.
25 DXP Enterprises, Inc.
26 Dynaway
27 Electrical Reliability Services Inc
28 Elko Wire Rope and Mining Supply
Empire Southwest
Employer Lynx, Inc.
Environmental Express, Inc
Eric C. Scott
Evolve Security, LLC
Examinetics Inc
Farmer Brothers
Fastenal Company
Federal Express
FedEx Freight
Ferguson Enterprises, Inc.
FKC Lake Shore
Flanders Electric Motor Service LLC
Flo Components Ltd
Flo-Line Technology, Inc.
Forestry Supplies, Inc.
Fritz-Pak Corporation
G.L. Tiley & Associates LTD.
G2 Archaeology
Geologic Associates, Inc.
GIOMI, INC.
Globe 24-7 Inc
Grainger
Grand Sierra Resort
Graphic Products, Inc

Greenfield Project Development Services LLC

Hard Rok Equipment, Inc.

Hard-Line USA, Inc.

Hartwell Thalacker LTD

Hatch LTD

Hawthorne Recycling Metals Co

Haynsworth Sinkler Boyd, PA

H-E Parts International Mining

Herc Rentals Inc

Hexagon Mining Inc.

High Grade Controls Corporation

Hitachi Solutions Canada, Ltd.

HosePower USA

Industrial Automation Services, Inc.

Ingeteam Inc

Insight Direct USA, Inc.

International Casting & Supplies

J.W. Welding Supplies and Tools

Jack R. Cline

Jackson Kelly PLLC

JBA Works, Inc.

Jeff N. Faillers, P.C.

Jennifer L. Light

Jentech Drilling Supply Inc

Jeremy B. Croft

Jose L. Arredondo Vizcaya

JP Mine Rescue Consultant, LLC

Kahl Commercial Interiors

Kappes, Cassiday & Associates

Kasandra C. Fimbres

Kenton Hoshino

Kimball Rentals LLC

Korin Carpenter

Kyle Bryce

Kyle White

L.N. Curtis & Sons

L/P Insurance Services, LLC

Lahontan Paramedical

LBR Enterprises, LLC d/b/a Copper Village

Legend, Inc.

Luis A. Ramirez

M. Dusenbury Envi. Services, Inc.

Marsh USA LLC

Mason Valley Fire Protection Distri

McGinley & Associates, Inc.

McLanahan Corporation

McMaster-Carr

Mike Probst

Miller Sales & Engineering, Inc.

MineARC Systems America, LLC

Minova USA Inc

Moly-Cop USA LLC

Motion Industries, Inc.

1 MSC Industrial Supply
myComply US Inc.
2 Nevada Cement Co.
NevCan Inc.
3 New Pig Corporation
NISS
4 Noe Leanos Garcia
Norco, Inc.
5 Nordic Minesteel Technologies Inc
Northern Nevada Rebar, INC.
6 Northern Tool
Occupational Health Centers of the
7 Office Depot
OSECOELFAB
8 Pac Machine Company, Inc.
Paessler AG
9 Pashman Stein Walder Hayden, P.C.
PetroSolutions LLC
10 PEX - Prepaid
Plastiques G Plus Inc
Postmaster
11 Praneeth Gali
Print N' Copy Center (PNCC)
12 Priority 1 Alert, Inc.
Progressive Insurance
13 Qal-Tek Associates LLC
Radiation Detection Company
14 Ramiro Guerrero
Raul D. Elenes
15 Redi Services, LLC
Renaissance Reno Downtown Hotel
16 RespSafety
Rick Hemsworth
17 Rock Solid Training and Solutions
Rock-Tech
18 RPM Expedite Nevada, LLC
Ryan McCalden
19 Safetyculture PTY LTD
SAMG Occupational Medicine
20 Sangoma US
Senergy Petroleum
21 Shoebox Ltd.
Shred-It USA LLC
22 Sierra Corporate Services
Sierra Electronics
23 Sierra Rental and Transport Co.Inc
Sign City
24 Silver State Analytical Labs
Silver State Fire LLC
25 Silver State Wire Rope & Rigging
Smith Power Products, Inc.
26 SNF Inc.
27 Sonoma Health & Safety Center
28

1 Sonsray Machinery, LLC
 Source Too Machine, Inc.
 2 Staples Contract & Commercial LLC
 State Fire DC Specialties, LLC
 3 Sticks & Stones
 Summit Engineering Corporation
 4 Super Tek X Automation, Inc.
 Synergy Controls Corporation
 The Cart Barn
 5 Tony Cerasia
 Tony Hendrick
 6 ULINE, Inc.
 United Central Industrial Supply Co
 7 United Rentals (North America)
 United Site Services of Nevada Inc
 8 UPS
 UPS Freight - Dallas
 9 Vanessa Quesada
 Vector Solutions
 10 Verve Cloud, Inc.
 Virginia Ibarra
 11 VLCM
 Walker River Mechanical Corp
 12 Wayne D. Felzien
 Weetah W. Kennison
 13 Weir Minerals North American
 Weld-Pro Solutions LLC
 14 Wells Fargo Vendor Financial Services LLC
 Western States Automation, LLC
 15 Whistleblower Security
 WiFiber LLC
 16 William H. Collins
 Wood Canada Limited
 17 Worley Canada Services Ltd.
 Yerington Auto Parts
 18 Yerington Family Vison Center
 Yerington Inn
 19 Zoro Tools, Inc

20 **Unsecured Noteholders**

21 Hannam Investments

SCHEDULE 2

AlixPartners' Disinterestedness

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- In connection with the proposed employment and retention of AlixPartners, LLP (“*AlixPartners*”) by the Debtors in these Chapter 11 Cases, AlixPartners undertook a complex process, the details of which are set forth below, 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 adverse to the Debtors’ estates.

AlixPartners Holdings, LLP, AlixPartners’ parent company (“*Holdings*”), directly or indirectly owns Holdings’ U.S. and non-U.S. subsidiaries (collectively, the “*Holdings Enterprise*”). The equity capital of Holdings is owned by the following investors:

- (i) Lakeview Capital Holdings, Inc., the Jay Alix Living Trust and other trusts established by Jay Alix (collectively the “*Lakeview Parties*”);
- (ii) Caisse de dépôt et placement du Québec (“*CDPQ*”);
- (iii) Investcorp Holdings B.S.C. (“*IVC*”);
- (iv) Public Sector Pension Investment Board (“*PSP*”); and
- (v) Current Partners and Managing Directors and certain former Managing Directors of AP (as defined below) and their individual and family trusts, as well as certain other individuals, including current members of the Boards (as hereinafter defined) and employees of the Lakeview Parties, and their individual and family trusts.

(Collectively, (i) – (v) above are hereinafter referred to as the “*Investors*”, and the subset (ii) – (iv) above are hereinafter referred to as the “*Institutional Investors*”).

Holdings and AlixPartners, each have a board of directors (together, the “*Boards*”). No individual or entity controls either of the Boards. Designees of each of the Investors (i) – (iv) above serve as members of the Boards. The Holdings Enterprise does not invest in distressed assets of any class, nor does it have any investment affiliates.

CDPQ is one of Canada’s largest institutional investment managers. It manages investments on behalf of most of Quebec Canada’s public and parapublic pension and insurance funds. CDPQ invests globally in numerous industries.

IVC is a leading global provider and manager of alternative investment products.

PSP is one of Canada’s largest pension investment managers. It invests funds for the pension plans of the Public Service, the Canadian Armed Forces, the Royal Canadian Mounted Police and the Reserve Force. PSP manages a diversified global portfolio in numerous industries throughout the world.

The Lakeview Parties and related entities are entities owned or controlled by Jay Alix that, among other things, make investments on behalf of Mr. Alix and his family.

In addition to their investments in Holdings, the Institutional Investors have substantial investments unrelated to AlixPartners.

1 The Boards are not involved in the delivery of client services and their members do not
2 have access to client files, except for a minority of members of the Boards that are
3 AlixPartners employees. As a precautionary matter, AlixPartners maintains information
4 barriers and guidelines designed to prevent certain confidential client information,
5 including the names of clients likely to be involved in a not-yet-filed case under the
6 Bankruptcy Code, from being shared with the Investors or their designees on the Boards.

7 To that end, no material nonpublic information about the Debtors (including, before the
8 filing of these Chapter 11 Cases, the fact that AlixPartners was about to undertake an
9 assignment involving the Debtors) has been or will be furnished by AlixPartners to the
10 Investors or their Board designees, and AlixPartners will continue to abide by its
11 confidentiality obligations to the Debtors. Each Investor is independent of each other
12 Investor and is governed by its own board of directors or similar body and managed by its
13 own management team. AlixPartners operates independently and does not share
14 employees, officers or other management with any of the Investors. AlixPartners and each
15 of the Investors have separate offices in separate buildings, use separate internet email
16 addresses, and do not otherwise share IT systems.

17 AlixPartners formed and currently holds a majority and controlling ownership interest in
18 GSS UK Holdings Limited (“**GSS**”). GSS and its subsidiaries developed a regulatory
19 technology platform to provide global, centralized sanctions screening services to financial
20 institutions. Various Investors, including certain AlixPartners Partners and Managing
21 Directors and Board members, hold minority ownership interests in GSS. AlixPartners
22 currently has a majority of the seats on the board of directors of GSS. GSS does not share
23 office space or IT systems with AlixPartners, but does share certain employees and services
24 such as finance systems. The names of GSS’s investors and customers (but not its vendors
25 and employees) are loaded into the database where AlixPartners’ connections are stored
26 and are disclosed as part of the disclosure process described herein.

27 AlixPartners has one database where connections are stored for all entities in the Holdings
28 Enterprise. The process for the preparation of disclosures is as follows: upon receipt of a
potential parties in interest list from the Debtors and/or their representatives (the “**Parties
in Interest List**”), all such parties are input to the database by team members familiar with
the database. A report of the “hits” is generated, and the team members review those “hits”
for connections. Where there is a connection, a disclosure is drafted. After the team
completes draft disclosures, the disclosures are reviewed by an in-house bankruptcy
attorney. The attorney coordinates with the team to finalize the disclosures, which are then
reviewed by the engagement’s Partner and Managing Director. These initial disclosures
(the “**Initial Disclosures**”) are thereafter filed with the Bankruptcy Court as part of the
retention pleadings.

Promptly thereafter, a bankruptcy paralegal in the firm uses the Initial Disclosures and the
Parties in Interest List to draft a firmwide email for each bankruptcy filing, including the
Debtors’ cases. This email is sent to every firm employee as well as the members of the
Boards and the Lakeview Parties. The firmwide email requests each recipient to review
the attached file that includes the parties in interest and corresponding disclosures,

1 and asks that every recipient: (a) contact the legal department in the event that they have
2 a connection or relationship with an interested party that is not included in our disclosures;
3 (b) if they have a connection or relationship with an interested party that is included in our
4 disclosures, confirm that it is accurately described; and (c) contact the legal department if
5 they own securities of the Debtors. Members of the legal team review all email responses
6 and draft any supplemental disclosures appropriate to reflect information received in
7 response to the firmwide email. After the review process described in the immediately
8 preceding paragraph, supplemental disclosures are thereafter filed with the Bankruptcy
9 Court.

10 After the Initial Disclosures are filed with the Bankruptcy Court, AlixPartners also provides
11 the names of the Debtors, their owners/investors, lenders and, on a case-by-case basis, other
12 named entities (collectively, the “**Investor Search Parties**”), to the Institutional Investors,
13 and requests that each Institutional Investor run a check of the Investor Search Parties
14 across all investment portfolios including, upon reasonable investigation, (i) private and
15 public funds, (ii) loan positions, and (iii) known positions across CLO holdings (all of the
16 foregoing subject to the exceptions listed below, the “**Investor Connections Check**”). The
17 exceptions to the Investor Connections Check are (i) investments over which the
18 Institutional Investors do not possess actual investment authority and discretion (“direct
19 control”), (ii) index replication position, (iii) investments owned in separate accounts
20 managed by independent parties not affiliated with the Institutional Investors, and (iv)
21 pooled investment vehicles in which the Institutional Investors do not exercise actual
22 control or in which the Institutional Investors do not have visibility sufficient to ascertain
23 such vehicle’s investments. Members of the legal team review all responses received from
24 the Institutional Investors and draft disclosures appropriate to reflect information received
25 from the Institutional Investors that, following review, are filed with the Bankruptcy Court.

26 Upon receipt of the responses from the Institutional Investors to the Investor Connections
27 Check, AlixPartners will file any supplemental disclosures which may be required.

28 To the extent AlixPartners learns of connections that are not included herein, AlixPartners
will promptly file a supplemental disclosure.

Further, AlixPartners may have had, currently have or may in the future have business
relationships with, among other entities, portfolio companies of the Institutional Investors
and portfolio companies of private equity funds in which they are limited partners, in
matters unrelated to the Debtors or their affiliates in these Chapter 11 Cases. Based on,
among other things, the business separation between each of the Investors and
AlixPartners, the contractual client confidentiality obligations of AlixPartners and the
information barriers referred to above, AlixPartners believes that it does not hold or
represent an interest adverse to the estate with respect to any such engagement.

Other than as specifically noted herein, AlixPartners has not undertaken to determine the
existence, nature, and/or full scope of any business relationships or connections that the
Investors may have with the Investor Search Parties, the Debtors and their affiliates, and
other parties in interest in these Chapter 11 Cases.

Specifically, AlixPartners obtained from the Debtors and/or their representatives the Parties in Interest List, which is attached hereto as Schedule 1 and conducted a search for connections in accordance with the procedures set forth above.

AlixPartners represents that, to the best of its knowledge, it knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested or hold or represent an interest adverse to the Debtors' estates, and furthermore wishes to disclose the following with respect to the Holdings Enterprise (collectively, "**AP**", unless otherwise noted):

- AP interacts with U.S. Bankruptcy Court judges and representatives of the U.S. Trustee Program regularly in its capacity as a professional consulting firm that offers turnaround and restructuring services.
- AP has issued debt in the form of a USD-denominated senior secured term loan, and a Euro-denominated senior secured term loan (collectively, the "**Term Loans**"), as well as revolving credit facility (the "**Revolving Credit Facility**").

Bank of America, N.A. serves as the Administrative Agent for the Term Loans and the Revolving Credit Facility and as such manages all trading of the Term Loans and Revolving Credit Facility between investors. Many of the holders of the Term Loans are pools organized by banks, mutual fund management companies and other fund managers (collectively, "**Fund Managers**") who pool debt instruments issued by multiple / different borrowers and offer interests in the pools to investors. The identities of the investors in the pools cannot be ascertained by AP. The Term Loans are actively traded. Thus, the list of Fund Managers and other investors directly holding the Term Loans can become outdated quickly. On a monthly basis, AP reviews the list of investors in the Term Loans for the purpose of making relationship disclosures in chapter 11 cases. As of the last monthly report, no Fund Manager or other investor in the Term Loans held greater than 10% of the combined US-denominated and Euro-denominated Term Loans. In the event that any entity accumulates a 10% or greater interest in the combined US-denominated and Euro-denominated Term Loans, AP will disclose the name of such entity.

The participants in the Revolving Credit Facility are Bank of America, N.A., Credit Suisse, Deutsche Bank AG Host Bank, Goldman Sachs Lending Partners LLC, HSBC Bank USA, NA, and JPMorgan Chase Bank N.A.

- The Internal Revenue Service ("IRS") is a former AP client in matters unrelated to the Debtors. The IRS is a lienholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- The United States Department of Justice ("DOJ"), including the United States Attorney General's Office, is a current and former client of AP in matters unrelated to the Debtors. The DOJ is a litigation party, adverse litigation party, lessor and professional to current and former AP clients in matters unrelated to the Debtors.

- 1 • AP follows a practice to solicit from the members of its Boards their connections to the
2 parties in interest independent of AP. In response, one or more of the members of its
3 Boards have offered the following disclosures:
 - 4 ○ Chubb Insurance Company of Canada (“**Chubb**”) is an insurance provider to the Debtors.
5 Chubb is a vendor to an AP investor or one of its affiliates. AP has a group insurance
6 program in place for all US managing directors and AP board members under which
7 personal excess liability (umbrella) insurance may be purchased from Chubb at group rates.
 - 8 ○ Pricewaterhouse Coopers LLP (“**PwC**”) is an unsecured creditor to the Debtors. An AP
9 Board member and an employee of one of his affiliates are former employees of PwC.
 - 10 ○ Robert Half, a contract counterparty to the Debtors. Robert Half Legal is a vendor to an
11 AP investor or one of its affiliates.
 - 12 ○ U.S. Bank Global Corporate Trust is a lender to the Debtors. U.S. Bank is a vendor to an
13 AP investor or one of its affiliates.
- 14 • Adobe Inc., a contract counterparty to the Debtors, is a vendor to AP.
- 15 • ADP Canada Co. Payroll Technologies, a benefit provider to the Debtors, and affiliated
16 entities (“**ADP**”), are adverse litigation parties, professionals and director-affiliated
17 companies to current and former AP clients in matters unrelated to the Debtors. ADP is a
18 former employer of a current AP employee. ADP is an employee benefits provider to AP.
- 19 • AIG Specialty Insurance Co., an insurance provider to the Debtors, and affiliated entities
20 (“**AIG**”), are bondholders, adverse litigation parties, non-adverse litigation parties,
21 investors, lessors, lenders and related parties to current and former AP clients in matters
22 unrelated to the Debtors. AIG is a former AP client in matters unrelated to the Debtors.
23 AIG is a former employer of current AP employees.
- 24 • Akin Gump Strauss Hauer & Feld (“**Akin**”), a creditor professional in these Chapter 11
25 Cases, is a professional, counsel and opposing counsel to current and former AP clients in
26 matters unrelated to the Debtors. Akin is a current and former AP client in matters
27 unrelated to the Debtors. Akin is a legal service provider to AP.
- 28 • Allen Overy Shearman Sterling US LLP (“**A&O Shearman**”), a professional to the
Debtors, is a professional and counsel to current and former AP clients in matters unrelated
to the Debtors. A&O Shearman is a current and former AP client in matters unrelated to
the Debtors. A&O Shearman is a former employer of a current AP employee.
- Allied World Specialty Insurance Company, an insurance provider to the Debtors, and
affiliated entities (“**Allied**”), are adverse litigation parties, non-adverse litigation parties,
lenders and litigation parties to current and former AP clients in matters unrelated to the
Debtors. Allied is an insurance provider to AP.

- 1 • Alvarez & Marsal Canada Inc., a professional to the Debtors, and affiliates (“**A&M**”) are
2 professionals, parent companies, adverse litigation parties and litigation parties to current
3 and former AP clients in matters unrelated to the Debtors. A&M is a current and former
4 AP client in matters unrelated to the Debtors. A&M is a former employer of current AP
5 employees.
- 6 • Amazon.com, an interested party in these Chapter 11 Cases, and affiliated entities
7 (“**Amazon**”), are related parties, adverse litigation parties, non-adverse litigation parties,
8 litigation parties, professionals to current and former AP clients in matters unrelated to the
9 Debtors. Amazon is a current and former AP client in matters unrelated to the Debtors.
10 Amazon is a former employer of current AP employees. Amazon is a vendor to AP.
- 11 • Aon and Aon Reed Stenhouse Inc., surety parties to the Debtors, and interested parties in
12 these Chapter 11 Cases, and affiliated entities (“**Aon**”), are bondholders, non-adverse
13 litigation parties, adverse litigation parties, lenders, lienholders and professionals to current
14 and former AP clients in matters unrelated to the Debtors. Aon is a current and former AP
15 client in matters unrelated to the Debtors. Aon is a former employer of current AP
16 employees. Aon is an insurance provider to AP.
- 17 • Applied Industrial Technologies, Inc., an interested party in these Chapter 11 Cases, is a
18 lienholder to a former AP client in matters unrelated to the Debtors.
- 19 • Aspen Insurance, an insurance provider to the Debtors, and affiliated entities (“**Aspen**”),
20 are bondholders, adverse litigation parties, non-adverse litigation parties, related parties
21 and litigation parties to current and former AP clients in matters unrelated to the Debtors.
22 Aspen is a former AP client in matters unrelated to the Debtors.
- 23 • Atlas Copco Customer Finance USA LLC, a lienholder to the Debtors, and affiliated
24 entities, are adverse litigation parties and litigation parties to former AP clients in matters
25 unrelated to the Debtors.
- 26 • Beazley, an insurance provider to the Debtors, and affiliated entities, are adverse litigation
27 parties to current and former AP clients in matters unrelated to the Debtors.
- 28 • Bennett Jones LLP, a creditor professional in these Chapter 11 Cases, is a professional to
current and former AP clients in matters unrelated to the Debtors.
- Berkley Industrial Comp. and Berkley Industrial Comp. d/b/a Carolina Casualty Insurance
Company, interested parties in these Chapter 11 Cases and benefit providers to the Debtors,
and affiliated entities (“**Berkley**”), are bondholders, investors and adverse litigation parties
to current and former AP clients in matters unrelated to the Debtors. Berkley is an
insurance provider to AP.
- Berkshire Hathaway Homestate Insurance Co. and Berkshire Hathaway Specialty
Insurance Company, insurance providers to the Debtors and interested parties in these
Chapter 11 Cases, and affiliated entities (“**Berkshire Hathaway**”), are bondholders,
adverse litigation parties, litigation parties, parent companies, related parties and investors

1 to current and former AP clients in matters unrelated to the Debtors. Berkshire Hathaway
2 is an insurance provider to AP.

- 3 • BMO Harris Bank and Bank of Montreal/Banque De Montreal, banking service providers
4 and lienholders to the Debtors, and affiliated entities (“**BMO**”), are adverse litigation
5 parties, non-adverse litigation parties, bondholders, lenders, lessors, lienholders, litigation
6 parties, professionals and shareholders to current and former AP clients in matters
7 unrelated to the Debtors. BMO is a former AP client in matters unrelated to the Debtors.
8 BMO is a former employer of a current AP employee.
- 9 • BrandSafway Services LLC, a lienholder to the Debtors, and affiliated entities
10 (“**BrandSafway**”), are director-affiliated companies to a former AP client in matters
11 unrelated to the Debtors. BrandSafway is a former AP client in matters unrelated to the
12 Debtors.
- 13 • Canopus/Amlin, insurance providers to the Debtors, and affiliated entities
14 (“**Canopus/Amlin**”), are adverse litigation parties to current and former AP clients in
15 matters unrelated to the Debtors. Canopus/Amlin is an insurance provider to AP.
- 16 • Capurro Trucking, an interested party in these Chapter 11 Cases, and affiliated entities, are
17 lessors to a current AP client in matters unrelated to the Debtors.
- 18 • CAT Financial and Caterpillar Financial SARL, equipment lessors, suppliers and vendors
19 to the Debtors, and affiliated entities (“**Caterpillar**”), are adverse litigation parties, non-
20 adverse litigation parties, lessors, lenders, lienholders and litigation parties to current and
21 former AP clients in matters unrelated to the Debtors. Caterpillar is a current and former
22 AP client in matters unrelated to the Debtors. Caterpillar is a former employer of current
23 AP employees. Caterpillar is a vendor to AP.
- 24 • CDS & Co, a shareholder to the Debtors, and affiliated entities, are shareholders to a former
25 AP client in matters unrelated to the Debtors.
- 26 • CDW Direct LLC, an interested party in these Chapter 11 Cases, and affiliated entities
27 (“**CDW**”), are lessors to a former AP client in matters unrelated to the Debtors. CDW is a
28 former AP client in matters unrelated to the Debtors. CDW is a vendor to AP.
- Charter Communications, a utility provider to the Debtors, and affiliated entities
29 (“**Charter**”), are adverse litigation parties, non-adverse litigation parties and lessees to
30 current and former AP clients in matters unrelated to the Debtors. Charter is a current and
31 former AP client in matters unrelated to the Debtors.
- Chubb Insurance Company of Canada, an insurance provider to the Debtors, and affiliated
32 entities (“**Chubb**”), are affiliates, bondholders, adverse litigation parties, lenders and non-
33 adverse litigation parties to current and former AP clients in matters unrelated to the
34 Debtors. Chubb is a current and former AP client in matters unrelated to the Debtors.
35 Chubb is an insurance provider to AP. AP has a group insurance program in place for all

1 US managing directors and AP board members under which personal excess liability
(umbrella) insurance may be purchased from Chubb at group rates.

- 2 • CIGNA, a benefit provider to the Debtors, and affiliated entities (“**CIGNA**”), are affiliates,
3 adverse litigation parties, bondholders, lenders and professionals to current and former AP
4 clients in matters unrelated to the Debtors. CIGNA is a former AP client in matters
unrelated to the Debtors. CIGNA is an insurance provider to AP.
- 5 • CIT Bank, N.A. and CIT Group/Equipment Financing, Inc., lienholders and equipment
6 lessors to the Debtors, and affiliated entities (“**CIT**”), are lenders, lessors, lienholders and
7 adverse litigation parties to current and former AP clients in matters unrelated to the
8 Debtors. CIT was a member of the official committee of unsecured creditors that retained
AP in Modell’s Sporting Goods, Inc., a former bankruptcy matter unrelated to the Debtors.
- 9 • Citigroup Global Markets Inc., a professional to the Debtors, and affiliated entities (“**Citi**”),
10 are adverse litigation parties, bondholders, investors, lenders, lessors, lienholders, litigation
11 parties, parent companies, professionals and shareholders to current and former AP clients
unrelated to the Debtors. Citi is a current and former AP client in matters
unrelated to the Debtors. Citi is a former employer of current AP employees.
- 12 • City of Reno, a governmental authority to the Debtors, is an adverse litigation party to
13 current and former AP clients in matters unrelated to the Debtors.
- 14 • Cleary, Gottlieb, Steen & Hamilton LLP (“**Cleary**”), a creditor professional in these
15 Chapter 11 Cases, is a professional and counsel to current and former AP clients in matters
unrelated to the Debtors. Cleary is a current and former AP client in matters unrelated to
16 the Debtors.
- 17 • CNA Canada, CNA Hardy and Continental Casualty Company, insurance providers to the
18 Debtors, and affiliated entities (“**CNA**”), are adverse litigation parties, non-adverse
19 litigation parties, bondholders, affiliates, lenders, litigation parties and lienholders to
current and former AP clients in matters unrelated to the Debtors. CNA is an insurance
provider to AP.
- 20 • Computershare, an unsecured creditor to the Debtors, and affiliated entities
21 (“**Computershare**”), are professionals to current and former AP clients in matters unrelated
22 to the Debtors. Computershare is a current and former AP client in matters unrelated to
the Debtors. Computershare is a member of the official committee of unsecured creditors
that retained AP in Rite Aid Corporation, a bankruptcy matter unrelated to Debtors.
- 23 • Davis, Graham & Stubbs LLP, a creditor professional in these Chapter 11 Cases, is a
24 professional to current and former AP clients in matters unrelated to the Debtors.
- 25 • De Lage Landen Financial Services, Inc., an interested party in these Chapter 11 Cases, is
26 a lender, lessor, lessee, lienholder and adverse litigation party to current and former AP
27 clients in matters unrelated to the Debtors.

- 1 • Department of Homeland Security, a governmental authority to the Debtors, is a
2 bondholder to current and former AP clients in matters unrelated to the Debtors.
Department of Homeland Security is a former AP client in matters unrelated to the Debtors.
- 3 • Department of Interior – BLM and United States Department of the Interior Bureau of
4 Land Management, governmental authorities and surety parties to the Debtors, are
bondholders and lessors to former AP clients in matters unrelated to the Debtors.
- 5 • Dorsey & Whitney LLP, an unsecured creditor to the Debtors, is a professional and counsel
6 to current and former AP clients in matters unrelated to the Debtors. Dorsey & Whitney
7 LLP is a former AP client in matters unrelated to the Debtors. Dorsey & Whitney LLP is
a legal service provider to AP.
- 8 • DSV Air & Sea, Inc., an interested party in these Chapter 11 Cases, is an adverse litigation
9 party and litigation party to current and former AP clients in matters unrelated to the
Debtors.
- 10 • DXP Enterprises, Inc., an interested party in these Chapter 11 Cases, is a litigation party to
11 a former AP client in matters unrelated to the Debtors.
- 12 • Elliott Investment Management, an affiliate of lenders to the Debtors, and affiliated entities
13 (“*Elliott*”), are affiliates, associated companies, bondholders, lenders, adverse litigation
14 parties, parent companies and shareholders to current and former AP clients in matters
unrelated to the Debtors. Elliott is a current and former AP client in matters unrelated to
the Debtors.
- 15 • Epiq Corporate Restructuring, LLC, a professional to the Debtors, and affiliated entities
16 (“*Epiq*”), are professionals to current and former AP clients in matters unrelated to the
Debtors. Epiq is a former AP client in matters unrelated to the Debtors. Epiq is a former
17 employer of current AP employees.
- 18 • FastTrack, an insurance provider to the Debtors, and affiliated entities, are associated
19 companies to a former AP client in matters unrelated to the Debtors.
- 20 • Federal Deposit Insurance Corporation (FDIC), a governmental authority to the Debtors,
is a current and former AP client in matters unrelated to the Debtors.
- 21 • Federal Express and FedEx Freight, interested parties in these Chapter 11 Cases, and
22 affiliated entities (“*FedEx*”), are adverse litigation parties, lessees, lenders and lienholders
23 to current and former AP clients in matters unrelated to the Debtors. FedEx is a vendor to
AP.
- 24 • Ferguson Enterprises, Inc., an unsecured creditor to the Debtors, is a former AP client in
25 matters unrelated to the Debtors.
- 26 • First Insurance Funding (a division of Lake Forest Bank & Trust Company), First
27 Insurance Funding Corp. and First Insurance Funding of Canada, unsecured creditors and
28

1 insurance providers to the Debtors, are lenders to a current AP client in matters unrelated
2 to the Debtors.

- 3 • FLSmidth, an unsecured creditor to the Debtors, and affiliated entities, are adverse
4 litigation parties and litigation parties to former AP clients in matters unrelated to the
5 Debtors.
- 6 • GM Financial, a lienholder to the Debtors, and affiliated entities (“**GM**”), are lessors,
7 lenders, adverse litigation parties, litigation parties and lienholders to current and former
8 AP clients in matters unrelated to the Debtors. GM is a former AP client in matters
9 unrelated to the Debtors. GM is a former employer of current AP employees.
- 10 • Grainger, an interested party in these Chapter 11 Cases, and affiliated entities
11 (“**Grainger**”), are adverse litigation parties, lienholders, non-adverse litigation parties and
12 litigation parties to current AP clients in matters unrelated to the Debtors. Grainger is a
13 former employer of a current AP employee.
- 14 • Graphic Products, Inc., an interested party in these Chapter 11 Cases, is a lienholder to a
15 former AP client in matters unrelated to the Debtors.
- 16 • Great American Insurance Group (GAIG), an insurance provider to the Debtors, and
17 affiliated entities (“**Great American**”), are adverse litigation parties and non-adverse
18 litigation parties to current and former AP clients in matters unrelated to the Debtors. Great
19 American is a current AP client in matters unrelated to the Debtors. Great American is an
20 insurance provider to AP.
- 21 • Guy F. Atkinson Construction, LLC, a supplier and vendor to the Debtors, is a litigation
22 party to a former AP client in matters unrelated to the Debtors.
- 23 • Herc Rentals Inc., an interested party in these Chapter 11 Cases, is a member of the official
24 committee of unsecured creditors that retained AP in Orbital Infrastructure Group, Inc., a
25 bankruptcy matter unrelated to Debtors.
- 26 • Hitachi Solutions Canada, Ltd., an interested party in these Chapter 11 Cases, and affiliated
27 entities (“**Hitachi**”), are associated companies, adverse litigation parties, lienholders,
28 litigation parties, director-affiliated companies, lenders and parent companies to current
and former AP clients in matters unrelated to the Debtors. Hitachi is a current and former
AP client in matters unrelated to the Debtors. Hitachi is a former employer of a current
AP employee. Hitachi is a vendor to AP.
- HosePower USA, an interested party in these Chapter 11 Cases, and affiliated entities, are
adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Humana Insurance Co., a benefit provider to the Debtors, and affiliated entities
 (“**Humana**”), are litigation parties and lessors to current and former AP clients in matters
unrelated to the Debtors. Humana is a member of the official committee of unsecured

creditors that retained AP in Rite Aid Corporation, a bankruptcy matter unrelated to Debtors.

- Insight Direct USA, Inc. (“***Insight Direct***”), an interested party in these Chapter 11 Cases, is a professional to a former AP client in matters unrelated to the Debtors. Insight Direct is a vendor to AP.
- Intact Insurance Company, an insurance provider to the Debtors, and affiliated entities, are insurance providers to AP.
- International Finance Corporation (IFC), a governmental authority to the Debtors, is an associated company to a former AP client in matters unrelated to the Debtors.
- Jackson Kelly PLLC, an interested party in these Chapter 11 Cases, is a professional to former AP clients in matters unrelated to the Debtors.
- Kaman Industrial Technologies Corporation, a lienholder to the Debtors, and affiliated entities (“***Kaman***”), are adverse litigation parties to a former AP client in matters unrelated to the Debtors. Kaman is a former AP client in matters unrelated to the Debtors.
- KfW IPEX-Bank GmbH, a lender to the Debtors, and affiliated entities, are lenders to former AP clients in matters unrelated to the Debtors.
- Komatsu Equipment Co., a lienholder to the Debtors, and affiliated entities (“***Komatsu***”), are lienholders and adverse litigation parties to former AP clients in matters unrelated to the Debtors. Komatsu is a former AP client in matters unrelated to the Debtors.
- Konica Minolta Premiere Finance, a contract counterparty to the Debtors, and affiliated entities (“***Konica Minolta***”), are lienholders and lessors to current and former AP clients in matters unrelated to the Debtors. Konica Minolta is a former AP client in matters unrelated to the Debtors.
- Lloyd’s Insurance Company, an insurance provider to the Debtors, and affiliated entities (“***Lloyd’s***”), are non-adverse litigation parties, adverse litigation parties, lenders and litigation parties to former AP clients in matters unrelated to the Debtors. Lloyd’s is a current and former AP client in matters unrelated to the Debtors. Lloyd’s is an insurance provider to AP.
- Maddox Industrial Transformer, LLC, an unsecured creditor to the Debtors, is a lienholder to a current AP client in matters unrelated to the Debtors.
- Manchester Securities Corp., a lender to the Debtors, is an affiliate of a current AP client in matters unrelated to the Debtors.
- Manpower, a temporary labor or staffing agency to the Debtors, is a former employer of a current AP employee.

- 1 • Markel Canada Limited, an insurance provider to the Debtors, and affiliated entities
2 (“**Markel**”), are associated companies, adverse litigation parties, lessors, non-adverse
3 litigation parties and shareholders to current and former AP clients in matters unrelated to
4 the Debtors. Markel is a former AP client in matters unrelated to the Debtors. Markel is
5 an insurance provider to AP.
- 6 • Marsh Canada Limited and Marsh USA LLC, insurance providers to the Debtors and
7 interested parties in these Chapter 11 Cases, and affiliated entities (“**Marsh**”), are non-
8 adverse litigation parties and professionals to former AP clients in matters unrelated to the
9 Debtors. Marsh is a former employer of a current AP employee. Marsh is a vendor to AP.
- 10 • Maxim Crane Works LP, a lienholder to the Debtors, is a former AP client in matters
11 unrelated to the Debtors.
- 12 • McInnes Cooper, an unsecured creditor to the Debtors, is a professional to former AP
13 clients in matters unrelated to the Debtors. McInnes Cooper is a vendor to AP.
- 14 • McDonald Carano, a professional to the Debtors, is a professional to a former AP client in
15 matters unrelated to the Debtors.
- 16 • McMaster-Carr, an interested party in these Chapter 11 Cases, and affiliated entities
17 (“**McMaster-Carr**”), are lienholders, litigation parties and adverse litigation parties to
18 former AP clients in matters unrelated to the Debtors. McMaster-Carr is a former employer
19 of current AP employees.
- 20 • Mercuria Energy Trading, Mercuria Holdings (Singapore) Pte Ltd and Mercuria
21 Investments US, Inc., lenders, unsecured creditors and shareholders to the Debtors, and
22 affiliated entities (“**Mercuria**”), are lenders and shareholders to former AP clients in
23 matters unrelated to the Debtors. Mercuria is a current and former AP client in matters
24 unrelated to the Debtors.
- 25 • Milbank LLP, a creditor professional in these Chapter 11 Cases, is a professional and
26 counsel to current and former AP clients in matters unrelated to the Debtors. Milbank LLP
27 is a current and former AP client in matters unrelated to the Debtors. Milbank LLP is a
28 former employer of a current AP employee.
- Miller Thomson LLP, an ordinary course professional to the Debtors, is a professional and
opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Moelis & Company, a professional to the Debtors, and affiliated entities (“**Moelis**”), are
investment bankers, lenders, non-adverse litigation parties and professionals to current and
former AP clients in matters unrelated to the Debtors. Moelis is a former AP client in
matters unrelated to the Debtors.
- Motion Industries, Inc., an interested party in these Chapter 11 Cases, is a lessor and
litigation party to former AP clients in matters unrelated to the Debtors.

- 1 • MSC Industrial Supply, an interested party in these Chapter 11 Cases, is a lienholder to a
2 former AP client in matters unrelated to the Debtors.
- 3 • Munich Reinsurance America, Inc., an insurance provider to the Debtors, and affiliated
4 entities, are adverse litigation parties and parent companies to former AP clients in matters
5 unrelated to the Debtors.
- 6 • Nationwide, a benefit provider to the Debtors, and affiliated entities (“*Nationwide*”), are
7 bondholders, adverse litigation parties, lienholders, litigation parties and lenders to current
8 and former AP clients in matters unrelated to the Debtors. Nationwide is an insurance
9 provider to AP.
- 10 • Nevada Department of Taxation, a taxing authority to the Debtors, is a bondholder to
11 former AP clients in matters unrelated to the Debtors.
- 12 • NFS Leasing, Inc., a lienholder to the Debtors, is a lienholder to a former AP client in
13 matters unrelated to the Debtors.
- 14 • NOREX Inc., a contract counterparty to the Debtors, is a vendor to AP.
- 15 • Office Depot, an interested party in these Chapter 11 Cases, is an affiliate to a former AP
16 client in matters unrelated to the Debtors. Office Depot is a former AP client in matters
17 unrelated to the Debtors. Office Depot is a vendor to AP.
- 18 • Partners in Performance USA Inc., an unsecured creditor to the Debtors, and affiliated
19 entities (“*Partners in Performance*”), are former employers of current AP employees.
20 Partners in Performance is a vendor to AP.
- 21 • Peoples United Bank, a lienholder to the Debtors, is a lienholder to a former AP client in
22 matters unrelated to the Debtors.
- 23 • Pricewaterhouse Coopers LLP, an unsecured creditor to the Debtors, and affiliated entities
24 (“*PwC*”), are non-adverse litigation parties and professionals to current and former AP
25 clients in matters unrelated to the Debtors. PwC is a current and former AP client in matters
26 unrelated to the Debtors. PwC is a former employer of current AP employees. PwC is a
27 tax advisor to AP.
- 28 • Progressive Insurance, an interested party in these Chapter 11 Cases, is an adverse litigation
party and litigation party to current and former AP clients in matters unrelated to the
Debtors.
- Prudential Insurance Company of America, a benefit provider to the Debtors, and affiliated
entities (“*Prudential*”), are bondholders, lienholders, lessors, professionals, lenders and
adverse litigation parties to current and former AP clients in matters unrelated to the
Debtors. Prudential is a former employer of a current AP employee.
- QBE Insurance, an insurance provider to the Debtors, , and affiliated entities (“*QBE*”), are
lenders, litigation parties, related parties, non-adverse litigation parties and adverse

1 litigation parties to current AP clients in matters unrelated to the Debtors. QBE is an
2 insurance provider to AP.

- 3 • Reliance Standard Life Insurance, a benefit provider to the Debtors, is a bondholder, lender
4 and adverse litigation party to current AP clients in matters unrelated to the Debtors.
- 5 • Robert Half, a contract counterparty to the Debtors, and affiliated entities (“**Robert Half**”),
6 are professionals to current and former AP clients in matters unrelated to the Debtors.
7 Robert Half is a former employer of current AP employees. Robert Half is a vendor to AP.
- 8 • Shred-It USA LLC, an interested party in these Chapter 11 Cases, and affiliated entities
9 (“**Shred-It**”), are professionals to a former AP client in matters unrelated to the Debtors.
10 Shred-It is a vendor to AP.
- 11 • Staples Contract & Commercial LLC, an interested party in these Chapter 11 Cases, and
12 affiliated entities (“**Staples**”), were members of the official committee of unsecured
13 creditors that retained AP in in 24 Hour Fitness Worldwide, Inc., a former bankruptcy
14 matter unrelated to the Debtors. Staples is a former employer of a current AP employee.
15 Staples is a vendor to AP.
- 16 • Starr Indemnity & Liability Co., an insurance provider to the Debtors, and affiliated entities
17 (“**Starr**”), are adverse litigation parties to current and former AP clients in matters
18 unrelated to the Debtors. Starr is a former AP client in matters unrelated to the Debtors.
19 Starr is an insurance provider to AP.
- 20 • State of Nevada, a governmental authority to the Debtors, is a bondholder, litigation party
21 and adverse litigation party to current and former AP clients in matters unrelated to the
22 Debtors.
- 23 • Summit Engineering Corporation, an interested party in these Chapter 11 Cases, is a
24 professional to a former AP client in matters unrelated to the Debtors.
- 25 • Summit Partners Credit Advisors LP, a shareholder to the Debtors, and affiliated entities
26 (“**Summit Partners**”), are non-adverse litigation parties, lenders, parent companies and
27 professionals to current and former AP clients in matters unrelated to the Debtors. Summit
28 Partners is a current and former AP client in matters unrelated to the Debtors.
- SunBelt Rentals Inc., a lienholder to the Debtors, and affiliated entities, are lienholders and
adverse litigation parties to current AP clients in matters unrelated to the Debtors.
- Swiss Reinsurance America Corp., an insurance provider to the Debtors, and affiliated
entities, are adverse litigation parties to former AP clients in matters unrelated to the
Debtors.
- TFORCE Freight, Inc., a lienholder to the Debtors, is a lienholder to a former AP client in
matters unrelated to the Debtors.

- 1 • ThermoFisher Scientific, a contract counterparty to the Debtors, and affiliated entities
2 (“**ThermoFisher**”), are lenders and litigation parties to former AP clients in matters
3 unrelated to the Debtors. ThermoFisher is a current and former AP client in matters
4 unrelated to the Debtors. ThermoFisher is a former employer of a current AP employee.
- 5 • Torys LLP (“**Torys**”), an ordinary course professional to the Debtors, is an adverse
6 litigation party, professional and counsel to current and former AP clients in matters
7 unrelated to the Debtors. Torys is a former AP client in matters unrelated to the Debtors.
- 8 • Total Quality Logistics, LLC, a lienholder to the Debtors, is a former employer of a current
9 AP employee.
- 10 • U.S. Bank Trust Company, National Association, a lender to the Debtors, and affiliated
11 entities (“**U.S. Bank**”), are bondholders, adverse litigation parties, litigation parties,
12 lenders, lessors, lienholders, professionals, non-adverse litigation parties and shareholders
13 to current and former AP clients in matters unrelated to the Debtors. U.S. Bank is a current
14 and former AP client in matters unrelated to the Debtors. U.S. Bank is an official member
15 of the committee of unsecured creditors that retained AP in iMedia Brands, Inc., a
16 bankruptcy matter unrelated to the Debtors. US Bank was a member of the official
17 committee of unsecured creditors that retained AP in Tops Holding II Corporation, a
18 former bankruptcy matter unrelated to the Debtors.
- 19 • ULINE, Inc., an interested party in these Chapter 11 Cases, is a lienholder to a former AP
20 client in matters unrelated to the Debtors. ULINE, Inc. is a vendor to AP.
- 21 • Union Pacific Railroad Company, an unsecured creditor to the Debtors, is a lessor, adverse
22 litigation party and litigation party to current and former AP clients in matters unrelated to
23 the Debtors.
- 24 • United Central Industrial Supply Co, an interested party in these Chapter 11 Cases, is a
25 non-adverse litigation party to a former AP client in matters unrelated to the Debtors.
- 26 • United Rentals (North America), an interested party in these Chapter 11 Cases, is a former
27 AP client in matters unrelated to the Debtors.
- 28 • United States Treasury, a taxing authority to the Debtors, is a former employer of a current
AP employee.
- UPS and UPS Freight – Dallas, interested parties in these Chapter 11 Cases, and affiliated
entities (“**UPS**”), are lienholders and adverse litigation parties to former AP clients in
matters unrelated to the Debtors. UPS is a former AP client in matters unrelated to the
Debtors. UPS was a member of the official committee of unsecured creditors that retained
AP in Bluestem Brands, Inc., a former bankruptcy matter unrelated to the Debtors. UPS is
a vendor to AP.

- 1 • Vector Solutions, an interested party in these Chapter 11 Cases, is a director-affiliated
2 company to a former AP client in matters unrelated to the Debtors. Vector Solutions is a
3 former AP client in matters unrelated to the Debtors.
- 4 • Vedder Price, an ordinary course professional to the Debtors, is a professional and counsel
5 to current and former AP clients in matters unrelated to the Debtors.
- 6 • Waste Management of Nevada, a utility provider to the Debtors, and affiliated entities, are
7 adverse litigation parties and lessors to current and former AP clients in matters unrelated
8 to the Debtors.
- 9 • WebBank, a lienholder to the Debtors, is a lender and adverse litigation party to former AP
10 clients in matters unrelated to the Debtors.
- 11 • Weir Minerals North American, an interested party in these Chapter 11 Cases, and
12 affiliated entities (“*Weir*”), are adverse litigation parties, litigation parties and lienholders
13 to current and former AP clients in matters unrelated to the Debtors. Weir is a former
14 employer of current AP employees.
- 15 • Wells Fargo Vendor Financial Services LLC, an interested party in these Chapter 11 Cases,
16 and affiliated entities (“*Wells Fargo*”), are bondholders, litigation parties, non-adverse
17 litigation parties, director-affiliated companies, lenders, lessors, lienholders, shareholders,
18 professionals and adverse litigation parties to current and former AP clients in matters
19 unrelated to the Debtors. Wells Fargo is a current and former AP client in matters unrelated
20 to the Debtors. Wells Fargo was a member of the ad hoc committee of noteholders that
21 retained AP in LBI Media, Inc., a former bankruptcy matter unrelated to the Debtors. Wells
22 Fargo was a member of the official committee of unsecured creditors that retained AP in
23 24 Hour Fitness Worldwide, Inc. and Extraction Oil & Gas, Inc., former bankruptcy
24 matters unrelated to the Debtors. Wells Fargo is a former employer to a current AP
25 employee.
- 26 • Wesco, a lienholder to the Debtors, and affiliated entities (“*Wesco*”), are adverse litigation
27 parties and litigation parties to current and former AP clients in matters unrelated to the
28 Debtors. Wesco is a current and former AP client in matters unrelated to the Debtors.
- White & Case LLP, a creditor professional in these Chapter 11 Cases, is a professional and
counsel to current and former AP clients in matters unrelated to the Debtors. White & Case
LLP is a current and former AP client in matters unrelated to the Debtors. White & Case
LLP is a former employer of a current AP employee.
- Williams Scotsman, Inc., a lienholder to the Debtors, is a lessor and adverse litigation party
to current and former AP clients in matters unrelated to the Debtors.
- Workiva Inc., an unsecured creditor to the Debtors, is a professional to current and former
AP clients in matters unrelated to the Debtors.

- Zurich Insurance Company Ltd, an insurance provider to the Debtors, and affiliated entities (“**Zurich**”), are bondholders, joint venture parties, adverse litigation parties, non-adverse litigation parties, litigation parties and lienholders to current and former AP clients in matters unrelated to the Debtors. Zurich is a current and former AP client in matters unrelated to the Debtors. Zurich is a former employer of a current AP employee. Zurich is an insurance provider to AP.