

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

SOLAR BIOTECH, INC., et al.,¹

Debtors.

Case No. 24-11402 (LSS)

Chapter 11

(Jointly Administered)

Hearing Date: September 12, 2024 at 3:00 p.m. (ET)
Obj. Deadline: August 22, 2024 at 4:00 p.m. (ET)

**AMENDED DECLARATION OF DAREN BRINKMAN IN SUPPORT OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS' APPLICATION TO
EMPLOY THE BRINKMAN LAW GROUP, PC EFFECTIVE AS OF JULY 9, 2024**

I, Daren Brinkman, declare as follows:

1. I am a shareholder at Brinkman Law Group, PC ("BLG"), which maintains offices at 543 Country Club Drive, Suite B, Wood Ranch, California 93065.
2. I am duly admitted to practice law in the States of Texas and California.
3. I submit this Declaration in support of the *Application for Entry of an Order Authorizing the Retention and Employment of BLG as counsel to the Official Committee of Unsecured Creditors effective as of July 9, 2024* [D.I. 143] (the "Application").
4. In preparing this declaration, BLG used a set of procedures established to ensure compliance with the requirements of the Bankruptcy Code and the Bankruptcy Rules regarding retention of professionals by an official committee under the Bankruptcy Code. In that regard, BLG reviewed the list of persons and entities disclosed by the Debtors who may be parties in interest in these Chapter 11 Cases, a copy of which is annexed hereto as **Schedule 1**. After conferring with Debtors' counsel, I was advised that this list did not contain the names of

¹ The Debtors in these Chapter 11 Cases are Solar Biotech, Inc. and Noblegen Inc. The location of Debtors' principal place of business is 5516 Industrial Park Rd, Norton, VA 24273, Attn: Alex Berlin.

Michael Sullivan and Zsolt Popse. However, a search through our conflicts database revealed that BLG has no connection to these parties.

5. To the best of my knowledge, information, and belief, BLG does not hold or represent any interest adverse to the Debtors' estates and is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1103(b) of the Bankruptcy Code.

6. BLG will conduct an ongoing review of its files to ensure that no disqualifying circumstances arise. If any new relevant facts or relationships are discovered, BLG will supplement its disclosure to the Court.

7. Although certain additional professionals and paraprofessionals at BLG may provide services to the Committee from time to time, the principal attorneys and paralegals presently designated to represent the Committee, and their current standard hourly rates, are:

Professionals:	Fees:
Paralegals	\$230-\$425
Associates	\$475-\$785
Shareholders and Of Counsel	\$595-\$1,650

8. The hourly rates set forth above are BLG's current regular hourly rates for work of this nature and are adjusted on an annual basis. These rates are set at a level designed to fairly compensate BLG for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses. I have agreed to lower my hourly rates from my customary rate of \$1,050 per hour to \$995 per hour. The other attorney from BLG who will be principally responsible in this case is Jory Cook, who will be billing at \$675 per hour. Such hourly rates do not include charges for non-legal personnel who also record time spent working on matters for particular clients. BLG has not shared or agreed to share any compensation received in connection with these cases with any other person, except as permitted by section 504(b) of the

Bankruptcy Code and Bankruptcy Rule 2016(b) in respect of sharing of compensation among
BLG's staff.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 23, 2024 in Wood Ranch, CA.

By: /s/

A handwritten signature in black ink, appearing to be 'Daren Brinkman', written over a horizontal line.

Daren Brinkman

Brinkman Law Group, PC

Schedule 1

Parties-in-Interest

AP Parties

Biofors LLC
Solinox (AES)
Marat Khodoun
SAFE, Inc.
TF Research and Development, Inc.
Christian Doppler Forschungsgesellschaft
Aggreko
Solidify LLC
Separation Guru, LLC.
CliftonLarsonAllen LLP (CLA)
Nandkumar Nandu Nayar
Young America Capital
Wells Fargo Equipment Finance, Inc.
The Kendall Group Inc
Ronald Morris
Aerotek, Inc.
Hamilton
Carter Machinery Company, Incorporated
The Astral Consulting Group
Revolution Law
TDX Consulting LLC
Mirror Polishing & Plating Company Inc.
M4 Knick LLC
Separation Equipment Company, Inc.
Carotek, Inc.
Thermo Electron North America LLC
Air Products and Chemicals, Inc.
Boone Dominion Process Company
Sanitary Fittings, LLC
FedEx
Bio-Rad Laboratories, Inc.
Rosemount Inc.
Fisher Scientific Co.
Hawkins, Inc.
Safe Foods Chemical Innovations
Amazon Business USA (PunchOut)
Cintas Corporation
New River Valley Ip Law Pc
Dassault Systemes Americas Corp
OTC Industrial
Compass Resources, LLC.

Ohly Americas
Glacier Tanks, LLC
Rain for Rent
Hygiena LLC
Southwest Tool Rental Inc.
c-LEcta GmbH
Timothy Erisman
Ingersoll-Rand Industrial U.S., Inc.
Neogen
Uline, Inc
RJM Sales, Inc.
Best Clean
Wells Fargo
Comfort Systems USA
RP Construction Inc
Holston Gases, Inc.
Portabull Storage, LLC.
VWR International
YSI, Inc.
Quality Rolloff Services, Inc.
DHL Express-USA
Cross Company-Process Solutions Group
Waugh Lawn Care
Fedex Freight
Wise Fire Equipment & Supply Co. Inc.
Environmental Monitoring Inc
United States Plastic Corp.
Registered Agent Solutions, Inc.
Automationdirect.com Inc
Pick Heaters, Inc.
HCE Systems, Inc.
QBO Keeper LLC
Wolseley Industrial Group
Total Quality Logistics, LLC
BDO Canada LLP
Brendan Brazier
DLA Piper
Federal Economic Development Agency
Food 4 Thought
Intertek
James Richardson & Sons Limited
Kawartha Credit Union
McWilliams Brothers Holdings Inc.
Nutrition Sustainability Strategies LLC
PartTime CFO Services
Stellaria

Trent University
Troutman Pepper
Wildeboer Dellelce LLP in Trust

Taxing Authorities

Wise County (Real Estate and Personal Property Taxes)
Delaware Division of Corporations (Delaware Franchise Tax)
Virginia Department of Taxation
State Corporation Commission of Virginia

Utility Providers

Wise County Public Service Authority
City of Norton Utilities
Kentucky Utilities
Comcast
Orkin
Point Broadband
Appalachian Natural Gas
Scott County Public Service Authority

Insurance Carriers

Evanston Insurance Company
Scottsdale Insurance Company
Northwest Professional Center
Monroe Guaranty Insurance Company
South-West Insurance Agency Inc.
At-Bay Insurance Services, LLC
GEICO Indemnity Company

Office of the U.S. Trustee

Andrew R. Vara
Joseph McMahon
Timothy J. Fox, Jr.
Fang Bu
Linda Casey
Joseph Cudia
Benjamin Hackman
Jane Leamy
Jonathan Lipshie
Hannah M. McCollum
Linda Richenderfer
Richard Schepacarter
Rosa Sierra-Fox
Holly Dice
Nyanquoi Jones
Jonathan Nyaku

James R. O'Malley
Diane Giordano
Lauren Attix
Shakima L. Dortch
Michael Girello
Christine Green
Edith A. Serrano
Elizabeth Thomas
Dion Wynn

United States Bankruptcy Court for the District of Delaware

Chief Judge John T. Dorsey
Judge Laurie Selber Silverstein
Judge Ashely M. Chan
Judge Brendan L. Shannon
Judge Craig T. Goldblatt
Judge J. Kate Stickles
Judge Karen B. Owens
Judge Mary F. Walrath
Judge Thomas M. Horan

Unsecured Creditors Committee Members

Dr. Marat Khodoun
Separation Guru, LLC
Boone Dominion Process Company, LLC

Additional Parties

Newpoint Advisors Corporation
Epiq Corporate Restructuring LLC
Potter Anderson & Corroon
Hogan Lovells US LLP
Powell Valley National Bank
Industrial Development Authority of Wise County
Ingredion
TriNet III, Inc.

Employees

Alex Berlin
Amelia Rose Clark
Chad Alan Jennings
Cragin K Harris
David Allen Kilgore
Devin McNew
Dylan Powers
Gabriel Jacob Dupree
James K Gilley Jr

Joseph A Peters
Kieu Phung Le-Hairston
Madeline Paige Clark
Mario Alex Ugaldes Alcavil Sr
Michael Brian Gilliam
Michael Mealer
Nathan David Tanoa Brown
Peter Le
Sean Paul Cope
Serhii Kovalov
Shaun Alan Christian
Tatyana Belenkaya
Thawdar Zin
Tiffany Vanlengen
Vera Maximenko Gutman
Jimmy Rose
Christopher McFall
Nadeshda Gerasimchuk
Abhishek Udawat
James Aubin
Kathleen Horlock-Roberts
Kevin Ralph
Lucas Berendse
Mahfuzur Shah
Mark Iliopoulos
Phillip Siambi
Scott Farrow
Shaojun Li
Sohidul Islam