

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

In re:

GLOBAL CLEAN ENERGY HOLDINGS, INC.
et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-90113 (ARP)
)
) (Jointly Administered)
)
)

**APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF MCDERMOTT
WILL & EMERY LLP AS COUNSEL, EFFECTIVE AS OF APRIL 30, 2025**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (the “Debtors”), hereby submits this application (the “Application”) for the entry of an order (the “Proposed Order”), substantially in the form attached hereto as **Exhibit A**, authorizing the employment, retention, and compensation of McDermott Will & Emery LLP (“McDermott”) as counsel to the Committee, effective as of April 30, 2025, pursuant to sections 328, 330, and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rules 2014-1 and 2016-1

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), and the U.S. Trustee Guidelines (as defined herein). In support of this Application, the Committee submits the *Declaration of Charles R. Gibbs in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel, Effective as of April 30, 2025* (the “Gibbs Declaration”), attached hereto as **Exhibit B**, and the *Declaration of Paul Bowmar in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel, Effective as of April 30, 2025* (the “Bowmar Declaration”), attached hereto as **Exhibit C**, both of which are incorporated herein by reference. In further support of this Application, the Committee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over the Chapter 11 Cases and this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). The relief requested is consistent with the U.S. Trustee Guidelines. The Committee confirms its consent to the entry of a final order with respect to this Application if it is determined that the Court would lack Article III jurisdiction to enter such final order or judgment absent consent of the parties.

2. Venue of the Chapter 11 Cases in this district is proper under 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 328, 330, and 1103(a) Bankruptcy Code. Relief is also proper pursuant to Bankruptcy Rules 2014 and 2016, Local Rules 2014-1 and 2016-1, and the *Procedures for Complex Cases in the Southern District of Texas*.

BACKGROUND

4. On April 16, 2025 (the “Petition Date”), each Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code in the Court. The Chapter 11 Cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Cases.

5. On April 28, 2025, pursuant to Bankruptcy Code section 1102, the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) appointed a five-member Committee: (a) Trinity Safety Company, (b) Bragg Investment Company, Inc., (c) J.T. Thorpe & Son, Inc., (d) Molecule Software, Inc., and (e) Castleton Commodities Merchant Trading L.P. *See Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 87].

6. On April 30, 2025, the Committee selected McDermott to serve as counsel to the Committee.

7. On May 5, 2025, the Committee selected Province LLC (“Province”) to serve as the Committee’s financial advisor.

RELIEF REQUESTED

8. By this Application, the Committee requests entry of the Proposed Order, attached hereto as **Exhibit A**, approving the employment and retention of McDermott, effective as of April 30, 2025, which is the date on which the Committee selected McDermott to serve as its counsel and the date that McDermott began rendering services to the Committee. Subject to the terms set forth herein, the Committee seeks to retain McDermott in accordance with McDermott's normal hourly rates in effect when services are rendered and normal reimbursement policies subject to Local Rule 2016-1.

THE RETENTION OF MCDERMOTT IS WARRANTED

9. McDermott possesses extensive knowledge and expertise in the substantive areas of law relevant to the Chapter 11 Cases and is well qualified to represent the Committee in connection with the Chapter 11 Cases. In selecting counsel, the Committee sought attorneys with considerable experience representing the interests of unsecured creditors in Chapter 11 Cases of this nature. McDermott has represented unsecured creditors' committees and the interests of unsecured creditors in numerous other cases. McDermott also has a broad-based practice in other key areas of law relevant to these Chapter 11 Cases. The Committee believes that McDermott is well qualified to serve as its counsel in these Chapter 11 Cases. Further, employment of McDermott as of April 30, 2025 is warranted under the circumstances of the Chapter 11 Cases. Upon its selection, the Committee requested that McDermott commence work immediately on time-sensitive matters and devote substantial resources to these Chapter 11 Cases prior to the submission and approval of this Application.

I. Scope of Services

10. McDermott will render, among other things, the following legal services to the Committee:

- a) Advise the Committee with respect to its rights, powers, and duties in the Chapter 11 Cases;
- b) Participate in in-person and telephonic meetings of the Committee and subcommittees formed thereby, if any;
- c) Assist and advise the Committee in its meetings and negotiations with the Debtors and other parties in interest regarding the Chapter 11 Cases;
- d) Assist the Committee in analyzing claims asserted against, and interests in, the Debtors, and in negotiating with the holders of such claims and interests and bringing, or participating in, objections or estimation proceedings with respect to such claims and interests;
- e) Assist the Committee in analyzing the Debtors' assets and liabilities, including in its review of the Debtors' Schedules of Assets and Liabilities, Statements of Financial Affairs, and other reports prepared by the Debtors, investigating the extent and validity of liens and participating in and reviewing any proposed transfer, sale, or disposition of the Debtors' assets, financing arrangements, and cash collateral stipulations or proceedings;
- f) Assist the Committee in its investigation of the acts, conduct, assets, liabilities, management, and financial condition of the Debtors, the Debtors' historic and ongoing operations of their businesses, and the desirability of the continuation of any portion of those operations, and any other matters relevant to the Chapter 11 Cases;
- g) Assist the Committee in its analysis of, and negotiations with the Debtors or any third party related to, financing, asset disposition transactions, and compromises of controversies, reviewing and determining the Debtors' rights and obligations under leases and executory contracts, and assisting, advising, and representing the Committee in any manner relevant to the assumption and rejection of executory contracts and unexpired leases;
- h) Assist the Committee in its analysis of, and negotiations with, the Debtors or any third party related to, the formulation, confirmation, and implementation of a chapter 11 plan(s) and all documentation related thereto (including the disclosure statement);

- i) Assist, advise, and represent the Committee in understanding its powers and duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- j) Assist and advise the Committee with respect to communications with the general creditor body regarding significant matters in the Chapter 11 Cases;
- k) Respond to inquiries from individual creditors as to the status of, and developments in, the Chapter 11 Cases;
- l) Represent the Committee at hearings and other proceedings before the Court and other courts or tribunals, as appropriate;
- m) Review and analyze complaints, motions, applications, orders, and other pleadings filed with the Court, and advise the Committee with respect to formulating positions with respect, and filing responses, thereto;
- n) Assist the Committee in its review and analysis of, and negotiations with the Debtors and their non-Debtor affiliates related to intercompany claims and transactions;
- o) Review and analyze third-party analyses and reports prepared in connection with the Debtors' potential claims and causes of action, advise the Committee with respect to formulating positions thereon, and perform such other diligence and independent analysis as may be requested by the Committee;
- p) Advise the Committee with respect to applicable federal and state regulatory issues, as such issues may arise in the Chapter 11 Cases;
- q) Assist the Committee in preparing pleadings and applications, and pursuing or participating in adversary proceedings, contested matters, and administrative proceedings as may be necessary or appropriate in furtherance of the Committee's duties;
- r) Take all necessary or appropriate actions as may be required in connection with the administration of the Debtors' estates, including with respect to a chapter 11 plan and related disclosure statement; and
- s) Perform such other legal services as may be necessary or as may be requested by the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code.

11. McDermott will coordinate with all other estate professionals, including the Debtors' professionals, and other appointed committees, if any, to avoid duplication of efforts.

II. McDermott's Disinterestedness and Disclosure Concerning Conflicts of Interest

12. Section 328(a) authorizes a committee appointed under Bankruptcy Code section 1102, with the court's approval, to employ "a professional person under section 327 or 1103 of this title, as the case may be, on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis." 11 U.S.C. § 328(a). Section 1103, in turn, requires that an attorney employed to represent a committee "may not, while employed by such committee, represent any other entity having an adverse interest in connection with the case." 11 U.S.C. § 1103.

13. As more fully set forth in the Gibbs Declaration attached hereto as **Exhibit B**, McDermott reviewed the list of interested persons and entities annexed to the Debtors' retention applications and ran the list of relevant parties in interest included on **Schedule 1** to the Gibbs Declaration through its conflicts system consistent with the U.S. Trustee's requirements. McDermott does not represent, or have any other connection with, any of the parties in interest listed on **Schedule 1**, subject to the disclosures set forth below and in the Gibbs Declaration. While employed by the Committee, McDermott will not represent any entity having an adverse interest to the Committee in connection with the Chapter 11 Cases. McDermott's conflict search resulted in the disclosures set forth on **Schedule 2** to the Gibbs Declaration.

14. The Committee is aware that McDermott currently represents certain interested parties in matters unrelated to the Chapter 11 Cases, as further identified in the Gibbs Declaration and listed on **Schedule 2**. McDermott does not and will not represent any such interested parties

in any matter related to the Debtors. The Committee hereby waives any conflict of interest that exists or may exist due to McDermott's representation of such interested parties in matters unrelated to the Debtors.

15. The Committee does not believe McDermott's representation of any interested party or its affiliate(s) in unrelated matters will impair McDermott's ability to represent the Committee as counsel in connection with the Chapter 11 Cases. The Committee has been informed that McDermott will conduct an ongoing review of its files to ensure that no disqualifying circumstances arise. To the extent that McDermott discovers any connection with any interested party or enters into any new relationship with any interested party, McDermott will promptly supplement its disclosures to the Court.

16. Based on the Gibbs Declaration, the Committee submits that McDermott is a "disinterested person" as that term is defined in Bankruptcy Code section 101(14), and neither represents nor holds an interest materially adverse to the interests of the Committee, or the Debtors or their estates with respect to the matters on which McDermott is to be employed.

III. Professional Compensation

17. The Committee requests that all legal fees and related costs and expenses incurred by the Committee on account of services rendered by McDermott in the Chapter 11 Cases be paid as administrative expenses of the Debtors' estates pursuant to Bankruptcy Code sections 328, 330(a), 331, 503(b), and 507(a). Subject to the Court's approval, McDermott will charge the Committee for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered.

18. McDermott intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any further orders of this Court for all services performed and expenses incurred since April 30, 2025.

19. McDermott's standard hourly rates for work of this nature for attorneys and paraprofessionals that may work on this matter, subject to annual adjustment each January to reflect economic and other conditions, are set forth below.

Title	2025 Standard Rates
Partners	\$1,500 - \$2,365
Associates	\$895 - \$1,485
Non-Lawyer Professionals	\$300 - \$1,320

20. Pursuant to Bankruptcy Code section 328(a), the Committee may retain McDermott on reasonable terms and conditions. The hourly rates set forth above are the firm's standard hourly rates for work of this nature. The firm's standard rates are set at a level designed to compensate the firm fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses.

21. McDermott has advised the Committee that the hourly rates set forth above are subject to annual increases in the normal course of McDermott's business. In the event of any such increase, McDermott will provide the Committee, the U.S. Trustee, and the Debtors with written notice of any such increase and file a supplemental affidavit (a "Supplemental Affidavit") with the Court. Any Supplemental Affidavit will explain the basis for the requested rate increase in accordance with Bankruptcy Code section 330(a)(3)(F). Pursuant to section B(2)(d) of

the U.S. Trustee Guidelines, McDermott will provide justification of the reasonableness of any rate increase.

22. McDermott will charge for expenses in a manner and at rates consistent with charges made generally to its other clients and in accordance with the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any applicable orders of this Court. Such expenses include, among other things, mail and express mail charges, special or hand delivery charges, travel expenses, expenses for computerized research, and transcription costs.

IV. Statement Regarding U.S. Trustee Guidelines

23. In 2013, the Executive Office for the United States Trustee (“EOUST”) adopted the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “Appendix B Guidelines”). By their terms, the Appendix B Guidelines “apply to the [U.S. Trustee’s] review of applications for compensation filed by attorneys in larger chapter 11 cases,” and are intended as an update to the original *Guidelines for Reviewing Applications for Compensation filed under 11 U.S.C. § 330*, adopted by the EOUST in 1996 (the “Appendix A Guidelines” and, together with the Appendix B Guidelines, the “U.S. Trustee Guidelines”). The Committee and McDermott will make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines, both in connection with this Application and the interim and final fee applications to be filed by McDermott.

RELIEF EFFECTIVE AS OF APRIL 30, 2025 IS WARRANTED

24. The Committee requests approval of the employment of McDermott effective as of April 30, 2025. Such relief is warranted by the circumstances presented by the Chapter 11 Cases.

The Committee's selection of McDermott as its counsel on April 30, 2025, necessitated that McDermott immediately commence work on time-sensitive matters and promptly devote substantial resources to the Chapter 11 Cases pending submission and approval of this Application.

NOTICE

25. Notice of this Application has been given to (i) the U.S. Trustee; (ii) counsel for the Debtors; and (iii) those persons who have requested notice pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given. No prior application for the relief requested herein has been presented to this Court or any other court.

[Remainder of page intentionally left blank]

CONCLUSION

WHEREFORE, the Committee requests that the Court enter the Proposed Order substantially in the form attached hereto as **Exhibit A**: (i) granting the Application; (ii) authorizing the Committee to retain, employ, and compensate McDermott as counsel to the Committee in connection with the Chapter 11 Cases, effective as of April 30, 2025; and (iii) granting such other and further relief as the Court may deem just and proper.

Dated: May 29, 2025

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF GLOBAL CLEAN ENERGY
HOLDINGS INC., *et al.*

By: /s/ Paul Bowmar
Paul Bowmar of Castleton Commodities
Merchant Trading L.P., By Castleton
Commodities Trading GP LLC, its General
Partner

Solely in his capacity as Chair of the
Official Committee of Unsecured Creditors
of Global Clean Energy Holdings Inc., *et al.*

EXHIBIT A

Proposed Order

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

In re:

GLOBAL CLEAN ENERGY HOLDINGS, INC.
et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-90113 (ARP)
)
) (Jointly Administered)
)
)

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF MCDERMOTT WILL & EMERY LLP AS COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, EFFECTIVE AS OF APRIL 30, 2025**

Upon the application (the “Application”)² of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the Chapter 11 Cases for entry of an order authorizing the Committee to employ and retain McDermott Will & Emery LLP (“McDermott”) as its counsel, effective as of April 30, 2025, pursuant to Bankruptcy Code sections 328(a), 330, and 1103(a), Bankruptcy Rules 2014(a) and 2016, and Bankruptcy Local Rules 2014-1 and 2016-1; and upon the Gibbs Declaration attached to the Application as **Exhibit B**; and upon the Bowmar Declaration attached to the Application as **Exhibit C**; and the Court having jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334 to consider the Application and the relief requested therein; and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being satisfied that notice of the Application and the opportunity for a hearing on the Application was appropriate under the particular circumstances and no further or other notice need be given; and the Court

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

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

being satisfied, based on the representations made in the Application, the Gibbs Declaration, and the Bowmar Declaration that McDermott does not represent or hold any interest materially adverse to the Debtors or their estates as to the matters upon which McDermott has been and is to be employed, and that McDermott is a “disinterested person” as such term is defined in Bankruptcy Code section 101(14); and that while employed by the Committee, McDermott will not represent any other person or entity having an adverse interest in connection with the Chapter 11 Cases; and this Court having determined that the legal and factual bases set forth in the Application, the Gibbs Declaration, and the Bowmar Declaration establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED as follows:

1. The Application is APPROVED as set forth herein.
2. Pursuant to Bankruptcy Code sections 328 and 1103(a), Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1, the Committee is authorized to employ and retain McDermott as its counsel, effective as of April 30, 2025, as modified by the terms of this Order.
3. McDermott shall maintain time records in one tenth hour increments and apply for compensation and professional services rendered and reimbursement of expenses incurred in connection with the Debtors’ Chapter 11 Cases in compliance with Bankruptcy Code sections 330 and 331, and applicable provisions of the Bankruptcy Rules, the Local Rules, and such other procedures as may be fixed by order of this Court. McDermott also intends to make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines, both in connection with the Application and the interim and final fee applications to be filed by McDermott in the Chapter 11 Cases.
4. McDermott will provide ten business days’ written notice of any rate increases to the Committee, the United States Trustee, and the Debtors, and will file a Supplemental Affidavit

detailing any such increases with the Court. The Committee, the Debtors, the U.S. Trustee, and all parties in interest retain all rights to object to any rate increase on all grounds including, but not limited to, the reasonableness standard provided for in Bankruptcy Code section 330, and the Court retains the right to review any rate increase pursuant to Bankruptcy Code section 330.

5. McDermott shall use its best efforts and coordinate with the Committee and its other retained professionals, to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 cases.

6. McDermott will review its files periodically during the pendency of the Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, McDermott will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

7. To the extent that McDermott uses the services of contract attorney in these cases, McDermott shall (a) pass through the cost of such contract attorneys to the Debtors at the same rate that McDermott pays the contract attorneys; (b) shall seek reimbursement for actual out-of-pocket expenses only; and (c) shall ensure that the contract attorneys are subject to the same conflict checks and disclosures as required of McDermott by Bankruptcy Rule 2014.

8. McDermott shall not be entitled to reimbursement for fees and expenses in connection with any objection to its fees, without further order of the Court.

9. To the extent the Application, the Gibbs Declaration, or the Bowmar Declaration is inconsistent with this Order, the terms of this Order shall govern.

10. The Committee and McDermott are authorized and empowered to take all actions they deem necessary and appropriate to effectuate the relief granted pursuant to this Order in accordance with the Application.

11. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

12. This Court has and shall retain exclusive jurisdiction to hear and determine all matters arising from the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025

ALFREDO R PÉREZ
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Declaration of Charles R. Gibbs

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

In re:

GLOBAL CLEAN ENERGY HOLDINGS, INC.
et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-90113 (ARP)
)
) (Jointly Administered)
)
)

**DECLARATION OF CHARLES R. GIBBS IN SUPPORT
OF THE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF MCDERMOTT
WILL & EMERY LLP AS COUNSEL, EFFECTIVE AS OF APRIL 30, 2025**

I, Charles R. Gibbs, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am an attorney at law admitted to practice before the Supreme Court of Texas, the United States District Courts for the Northern, Southern, Eastern, and Western Districts of Texas and the United States Courts of Appeals for the First, Third, Fourth, Fifth, Eighth, and Eleventh Circuits. I am a partner of the law firm of McDermott Will & Emery LLP (“McDermott”), which maintains offices at, among other places, 2801 North Harwood Street, Suite 2600, Dallas, Texas 75201.

2. I am familiar with the matters set forth herein and make this declaration in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

*Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel, Effective as of April 30, 2025 (the “Application”).*²

3. On April 28, 2025, pursuant to Bankruptcy Code section 1102, the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) appointed a five-member Committee: (a) Trinity Safety Company, (b) Bragg Investment Company, Inc., (c) J.T. Thorpe & Son, Inc., (d) Molecule Software, Inc., and (e) Castleton Commodities Merchant Trading L.P. *See Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 87].

4. On April 30, 2025, the Committee selected McDermott to serve as counsel to the Committee.

5. On May 5, 2025, the Committee selected Province LLC (“Province”) to serve as the Committee’s financial advisor.

6. McDermott began rendering services to the Committee immediately following its selection by the Committee.

MCDERMOTT’S DISCLOSURE PROCEDURES

7. To prepare this declaration, I, or someone under my supervision, reviewed the names set forth on a list of parties in interest identified by the Debtors. From this list, McDermott created a search list (the “Search List”) of relevant parties consistent with the U.S. Trustee’s requirements, a copy of which is attached hereto as **Schedule 1**. McDermott then compared the Search List with the information contained in the conflicts check systems and indexes of adverse parties currently maintained by McDermott (the “Conflicts System”).

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

8. The Conflicts System is designed to include every matter on which the firm is now engaged, as well as previous matters on which the firm was engaged that were closed over the last approximately five (5) years, sorted by the entity which has engaged the firm and, in each instance, listing the identity of the clients, related parties and adverse parties, and the attorneys in the firm who are knowledgeable about each matter. It is McDermott's policy that a new matter may be opened within the firm only after completing and submitting to those charged with maintaining the Conflicts System the information necessary to check each such matter for conflicts, including the identity of the prospective client and related adverse parties. McDermott maintains and systematically updates the Conflicts System in the regular course of the firm's business, and it is the regular practice of the firm to make and maintain these records.

9. Further, an e-mail was sent to the entire firm requesting that individuals disclose whether they (a) hold stock or any options to purchase stock in the Debtors of their affiliates, (b) hold a claim of any kind against the Debtors or their affiliates, (c) were a director, officer, or employee of the Debtors or their affiliates within the past three years, (d) are a close relative of a director or officer of the Debtors or their affiliates, or (e) have a close personal relationship with or are related to (i) any of the Judges of the United States Bankruptcy Court for the Southern District of Texas, or (ii) any employee of the Office of the United States Trustee for the Southern District of Texas or the United States Bankruptcy Court for the Southern District of Texas.

**MCDERMOTT'S CONNECTIONS WITH PARTIES IN
INTEREST IN MATTERS UNRELATED TO THE CHAPTER 11 CASES**

10. I, or a person under my supervision, reviewed any client connections to the Chapter 11 Cases to determine whether McDermott has an adverse interest to the Debtors' estates. McDermott ran the names of all parties in interest on **Schedule 1** hereto through its Conflicts System, and McDermott does not represent, or have any other connection with, any of the parties in interest listed on **Schedule 1**, subject to the disclosures set forth on **Schedule 2**, which is incorporated herein by reference.

11. McDermott's conflicts search resulted in the disclosures set forth on **Schedule 2** to this declaration. The Committee is aware that McDermott has previously represented or currently represents certain creditors or parties in interest and/or their affiliates in matters unrelated to the Debtors and, unless noted otherwise, the Chapter 11 Cases.

12. To the best of my knowledge and information, the annual fees for each of the last three years paid to McDermott by any party on **Schedule 1** or its affiliates did not exceed 1% of McDermott's annual gross revenue. To the extent that issues arise that would cause the Committee to be adverse to any of McDermott's clients such that it would not be appropriate for McDermott to represent the Committee with respect to any such matters, the Committee will retain conflicts counsel to represent the Committee with respect to those matters.

13. I believe the connections disclosed on **Schedule 2** and herein have not and will not affect McDermott's representation of the Committee in the Chapter 11 Cases. McDermott's representation of these parties does not comprise a material component of McDermott's practice, nor does McDermott currently represent such parties on any issue relating to the Debtors.

14. McDermott does not currently directly represent the Debtors or any of their affiliates, partners or subsidiaries in the Chapter 11 Cases, and McDermott will not undertake any such representation during this engagement.

15. Based upon the information available to me, McDermott is a “disinterested person” as that term is defined in Bankruptcy Code section 101(14), and neither represents nor holds an interest materially adverse to the interests of the Committee, the Debtors, or their estates with respect to the matters on which McDermott is to be employed. To the extent McDermott discovers any connection with any party or enters into any new relationship with any party that otherwise would have been required to be disclosed in this Application, McDermott will promptly supplement its disclosures to the Court.

16. While employed by the Committee, McDermott will not represent any other entity having an adverse interest in connection with the Chapter 11 Cases.

17. Insofar as I have been able to ascertain, neither I, McDermott, nor any McDermott attorneys:

- (a) are creditors, equity security holders, or insiders of the Debtors;
- (b) are, or were within three years before the date of the filing of the petition, a director, officer, or employee of the Debtors; or
- (c) have an interest materially adverse to the interests of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in, the Debtors or for any other reason.

18. As part of its diverse practice, McDermott appears in numerous cases, proceedings, and transactions involving many different professionals (both aligned with and adverse to McDermott), including other attorneys, financial advisors, and investment bankers, some of whom may be or represent parties in interest in the Chapter 11 Cases. McDermott does not, and will not,

represent any such professional in connection with the Chapter 11 Cases. Moreover, from time to time, McDermott has referred work to other professionals that may be retained in the Chapter 11 Cases. Likewise, certain such professionals may have referred work to McDermott.

19. Except as otherwise set forth herein, insofar as I have been able to ascertain, the partners, counsel, and associates of McDermott do not have any connection with the Debtors, the Debtors' officers and directors, the Debtors' creditors, the Debtors' equity security holders, and other known parties in interest or their respective attorneys and accountants, or the members of the Committee. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any partner, counsel, associate, paraprofessional, or staff member of McDermott, insofar as I have been able to ascertain, is related to the bankruptcy judge assigned to the Chapter 11 Cases.

20. As part of its diverse practice, McDermott appears in numerous cases, proceedings, and transactions involving many different professionals (both aligned with and adverse to McDermott), including other attorneys, financial advisors, and investment bankers, some of whom may be or represent parties in interest in the Chapter 11 Cases. McDermott does not, and will not, represent any such professional in connection with the Chapter 11 Cases. Moreover, from time to time, McDermott has referred work to other professionals that may be retained in the Chapter 11 Cases. Likewise, certain such professionals may have referred work to McDermott.

MCDERMOTT'S RATES AND BILLING PRACTICES

21. No promises have been received by McDermott or any McDermott attorney as to payment or compensation in connection with the Chapter 11 Cases other than in accordance with the provisions set forth herein. McDermott has no agreement with any other entity to share with

such entity any compensation received by McDermott or by such entity. McDermott has received no retainer in the Chapter 11 Cases to represent the Committee.

22. McDermott intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines (as defined herein), and any further orders of this Court for all services performed and expenses incurred since April 30, 2025. McDermott expressly reserves the right to seek compensation for services and reimbursement of expenses incurred by defending challenge(s) to this Application and/or any fee applications filed by McDermott in the Chapter 11 Cases.

23. McDermott's standard hourly rates for work of this nature for attorneys and paraprofessionals that may work on this matter, subject to annual adjustment each January to reflect economic and other conditions, are set forth below.

Title	2025 Standard Rates
Partners	\$1,500 - \$2,365
Associates	\$895 - \$1,485
Non-Lawyer Professionals	\$300 - \$1,320

24. The Application requests, pursuant to Bankruptcy Code section 328(a), approval of the Committee's retention of McDermott as its counsel. The hourly rates set forth above and in the Application are the firm's standard hourly rates for work of this nature. The firm's standard rates are set at a level designed to compensate the firm fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses.

25. McDermott has advised the Committee that the hourly rates set forth above are subject to annual increases in the normal course of McDermott's business. In the event of any such

increase, McDermott will provide the U.S. Trustee and the Committee with written notice of any such increase and file a supplemental affidavit (a “Supplemental Affidavit”) with the Court. Any Supplemental Affidavit will explain the basis for the requested rate increase in accordance with Bankruptcy Code section 330(a)(3)(F). Pursuant to section B(2)(d) of the U.S. Trustee Guidelines, McDermott will provide justification of the reasonableness of any rate increase.

26. McDermott will charge for expenses in a manner and at rates consistent with charges made generally to its other clients in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines and any other applicable orders of this Court. Such expenses include, among other things, mail and express mail charges, special or hand delivery charges, travel expenses, expenses for computerized research, and transcription costs.

27. The foregoing constitutes the verified statement of the person to be employed, required under Bankruptcy Rule 2014.

STATEMENT REGARDING U.S. TRUSTEE GUIDELINES

28. In 2013, the Executive Office for the United States Trustee (“EOUST”) adopted the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “Appendix B Guidelines”). By their terms, the Appendix B Guidelines “apply to the [U.S. Trustee’s] review of applications for compensation filed by attorneys in larger chapter 11 cases,” and are intended as an update to the original *Guidelines for Reviewing Applications for Compensation filed under 11 U.S.C. § 330*, adopted by the EOUST in 1996 (the “Appendix A Guidelines” and, together with the Appendix B Guidelines, the “U.S. Trustee Guidelines”). McDermott will make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set

forth in the U.S. Trustee's Guidelines, both in connection with the Application and the interim and final fee applications to be filed by McDermott in the Chapter 11 Cases.

ATTORNEY STATEMENT PURSUANT TO APPENDIX B GUIDELINES

29. The following is provided in response to the request for additional information set forth in ¶ D.1 of the Appendix B Guidelines.

- (a) McDermott has not agreed to variations from, or alternatives to, its standard or customary billing arrangements for this engagement;
- (b) none of McDermott's professionals included in this engagement have varied their rates based on the geographic location of the Chapter 11 Cases;
- (c) McDermott did not represent the Committee before the Petition Date; and
- (d) McDermott expects to develop a budget and staffing plan to comply with the U.S. Trustee's requests for information and additional disclosures, and any orders of the Court. Recognizing that unforeseeable fees and expenses may arise in large chapter 11 cases, McDermott may need to amend the budget as necessary to reflect changed circumstances or unanticipated developments.

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

Executed on this 29 day of May 2025

/s/ Charles R. Gibbs

Charles R. Gibbs

SCHEDULE 1

List of Interested Parties

GLOBAL CLEAN ENERGY HOLDINGS INC., *ET AL.*
PARTIES IN INTEREST^{1 2}

Debtors

Agribody Technologies, Inc.
Bakersfield Renewable Fuels, LLC
BKRF HCB, LLC
BKRF HCP, LLC
BKRF OCB, LLC
BKRF OCP, LLC
GCE Holdings Acquisitions, LLC
GCE International Development, LLC
GCE Operating Company, LLC
GCEH CS Acquisition, LLC
GCEH Ventures, LLC
Global Clean Energy Texas, LLC
Rosedale Financeco LLC
Sustainable Oils, Inc.

Current Directors and Officers

Anhalt, Susan
Atkins, Wade
Bernstein, Barny
Currie, Phyllis
D'Amico, Antonio
Herreras, Yuri
Iezzoni, Timothy J.
Karst, Michael
Palmer, Richard
Verleun, Noah
Walker, David R.
Wenzel, Martin
Wood, Amy K.

Bankruptcy Judges and Staff for the Southern District of Texas (and key staff members)

Barrera, Velma
Castro, Ana

¹ This list (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. We have attempted to remove duplicate entries where possible. Accordingly, a party that otherwise may fall under multiple categories is likely to be listed under only one category.

² Pursuant to the *Order (I) Authorizing the Debtors to File Under Seal the Names of Certain Confidential Parties in Interest and (II) Granting Related Relief* [Docket No. 197] and in accordance with the Committee Bylaws, McDermott is authorized to file an unredacted version of its Parties in Interest list under seal.

Chavez, Jeannie
Conrad, Tracey
D’Venturi, Rosy
Hansen, Darlene
Holden, Shannon
House, Akeita
Isgur, Marvin, Judge
Jackson, Aaron
Laws, Tyler
Lila, Yesenia
Lopez, Christopher M., Judge
Norman, Jeffrey P., Judge
Ochsner, Nathan
Perez, Alfredo R., Judge
Reimann, Lana
Rodriguez, Eduardo V., Chief Judge
Salazar, Anna
Saldana, Rosario
Smith, Lucia
Thomas-Anderson, Sierra
Veliz, Aimee

Banks, Lenders, UCC Lien Parties, and Administrative Agent

[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
Bank Direct
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
Camelina Co. Espana
Castleton Commodities Merchant Trading LP
[Potential Lender – Filed Under Seal]
Chicago Title Insurance Co.
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
CTCI Corp.
[Potential Lender – Filed Under Seal].
[Potential Lender – Filed Under Seal]
Entara LLC
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
GCM Investments GP LLC

[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
Independence Bank
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Individual – Redacted]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
Lake Forest Bank & Trust Co. NA
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
OIC LP
Orion Energy Credit Opportunities Fund II GPFA LP
Orion Energy Credit Opportunities Fund II LP
Orion Energy Credit Opportunities Fund II PV LP
Orion Energy Credit Opportunities Fund III GPFA LP
Orion Energy Credit Opportunities Fund III GPFA PV LP LIF AIV 1 LP
Orion Energy Credit Opportunities Fund III LP
Orion Energy Credit Opportunities Fund III PV LP
Orion Energy Credit Opportunities GCE Co-Invest B LP
Orion Energy Credit Opportunities GCE Co-Invest LP
Orion Energy Partners TP Agent LLC
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
Targeted Growth Inc.
[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]
U.S. Bank NA
[Potential Lender – Filed Under Seal]
United States, Government of the, Department of The Treasury
Vitol Americas Corp.
Voya Alternative Asset Management LLC
Voya Renewable Energy Infrastructure Originator 1 LLC
Voya Renewable Energy Infrastructure Originator LP
[Potential Lender – Filed Under Seal]

Contract Counterparties

A&J Refrigeration
Abacus Int Inc.
Abate-A-Weed
Advanced Combustion Inc.
Advanced Industrial Services Inc.
Alan Jack's Lawn Service
Altura Engineering & Design LLC
Ambilabs LLC
Ametek Solidstate Controls
Ancon Services
Anival Corp.
Anton Paar USA Inc.
Anvil Corp.
Applus RTD USA Inc.
Aptim Service
Argo Chemical
Arkema Inc.
Asbestos Services Inc.
Associated Tank Constructors
ATBD Inc.
Becht Engineering Co. Inc.
Becht Industrial Group
Blackhawk Security
BPS Supply Group
Bragg Cos.
Brand Scaffold Services
Braun Electric Co.Inc.
Brown & Caldwell
Bureau Veritas North America
C&H Testing Service
C.A.P. Air Freight Inc.
California Boiler Inc.
Camin Cargo Control Holdings Inc.
Catalyst Handling Resources LLC
CBI Services
Century Calibrating Co.
Coastal Chemical Co.
Curtis Electrical Construction Inc.
Cust-O-Fab Inc.
Delta Tech Service Inc.
Direwolf Industries Inc.
Diversified Project Services International Inc.
Dole Enterprises Inc.
Dry Creek Enterprises

Elite Automation & Electrical Services Inc.
Emerson LLLP
Energy Project Solutions LLC
Envirogreen Technologies
Environmental Safety Solutions Inc.
Everline Compliance CA LLC
Evoqua Water Technologies
Exponential Power LLC
Farwest Corrosion Control Co. Inc.
Flowserve T&CS
Gas Purification Engineering Corp.
Gauge Point Calibration Inc.
General Production Service of California Inc.
Global Design
Global Scaffold Construction Services Inc.
Goldsmith Construction Co. Inc.
H.F. Cox Inc.
Harder Mechanical Contractors Inc.
Honeywell Process Solutions
Industrial Design Solutions Inc.
Industrial Plant Reclamation Inc.
Ineos Americas LLC
Innospec Fuel Specialties LLC
Integrated Turbomachinery Inc.
J&H Drilling Co. Inc.
J.A. Placek Construction Co.
JAB Communications Inc.
[Individual – Redacted]
Jettech Mechanical LLC
John Zink Hamworthy Combustion
Jones Environmental Inc.
Jorgensen Inc.
JT Thorpe & Son Inc.
JTI Electrical & Instrumentation LLC
Laramy Water Inc.
Linde Engineering North America LLC
Linde Gas & Equipment Inc.
M Chemical Co. Inc.
Mangan Inc.
Matrix North American Construction Inc.
Merichem Co. Inc.
Merichem Technologies
Mesa Energy Systems Inc.
Mistras Group Inc.
MMI Services Inc.
Motor Service SpA

MP Environmental Services Inc.
MSA- C-035 Alliance Emissions/Aeros Environmental
MTS Stimulation Inc.
Nalco
Nations Roof West LLC
Novel Engineering Solutions LLC
Oil Well Service Co.
OST Trucks & Cranes
Pape Material Handling Inc.
Parker Hannifin Corp.
Parsons Environment & Infrastructure Group Inc.
Patriot Environmental
Pentair-Confidentiality Agreement
Performance Contracting Inc.
PFT Alexander
Ponder Environmental Services Inc.
Primoris Design & Construction Inc.
Pro Safety & Rescue Inc.
Railworks Track Services LLC
RAP Services
RBI Services Inc.
Reactor Resources
Refined Technologies Inc.
Refrigeration Group Inc., The
Resa Power Solutions
Revival Well Service
Richard Design
Richard's Crane Service LLC
Rival Well Services Inc.
RK Power Engineering
RLH Fire Protection
Rust Automation
Savage Services Corp.
SC Field Technical Services
Schneider Electric Systems USA Inc.
SEJNB Inc.
Siemens Energy Inc.
South Valley Cos.
Stantec Consulting Services
Streamline Innovation Inc.
Suez WTS USA
Sulfa Trap LLC
Sulzer Pumps
Sulzer Tower Field Service
T.EN Stone & Webster Process Technology Inc.
Take A Break

Team Industrial Services
Titan Quality Power Service LLC
Total Western Inc.
Trans-West Security Services
Trinity Safety Co.
TRSC Inc.
Turner Trans Lift
Unified Field Services Corp.
Univar Solutions USA Inc.
Universal Plant Services
USA Debusk LLC
Well Analysis Corp.
WESCO Distribution
West Coast Construction
West Coast Construction & Mechanical Inc.
West Coast Environmental Solutions Inc.
West Coast Welding & Piping Inc.
Westair Gases & Equipment Inc.
Wunderlich Malec Services Inc.

Debtor and Creditor Restructuring Professionals

Alvarez & Marsal Holdings LLC
Epiq
Hilco Inc.
Latham & Watkins LLP
Lazard Group LLC
Norton Rose Fulbright LLP
Perella Weinberg Partners

Insurance

Admiral Insurance Co.
AIG
Alcor Lloyd's Consortium
Alliant Credit Union
Allianz Global Corporate & Specialty SE
Amboss Underwriting Ltd. (Lloyd's Of London)
Amlin Lloyd's Syndicate
Amwins Brokerage of Georgia
Amwins Insurance Brokerage LLC
Apollo Syndicate Management Ltd.
Arch Insurance International
Ardonagh Specialty Ltd.
Argenta Syndicate Management Ltd.
Ark Syndicate Management Ltd.
Aspen's Lloyd's Syndicate

Associated Industries Insurance Co.
At-Bay Specialty Insurance Co.
Axis Insurance Co.
Axis Specialty Europe SE
Axis Surplus Insurance
Bank Direct
Beazley Insurance
Beazley Lloyd's Syndicate
Beazley Syndicate 2623/623
Beazley Syndicates 623, 2623
Berkshire Hathaway Inc.
Brit Group Services Ltd.
Chaucer Underwriting Services Ltd.
Convex Insurance UK Ltd.
CRC Insurance Services Inc.
Crum & Forster Insurance Co.
Dale Lloyd's Syndicate
Endurance Risk
Evanston Insurance Co.
Everest National Insurance Co.
Fidelis Underwriting Ltd.
First Insurance Funding
General Security Indemnity Co. of Arizona
GIC Lloyd's Syndicate
Great American Insurance Co.
Great Lakes Insurance SE
Hamilton Insurance Designated Activity Co.
Hamilton Re Ltd.
Hamilton UK Services Ltd.
HDI Global Specialty SE
Hiscox Syndicates Ltd.
HSB Specialty Insurance Co.
Inigo Lloyd's Syndicate- 1301 IGO
International General Insurance Co. (UK) Ltd.
IQUW Syndicate Management Ltd.
Ironshore Specialty Insurance Co.
Ki Insurance
Lake Forest Bank & Trust Co. NA
Lancashire Insurance Co. (UK) Ltd.
Lexington Insurance Co.
Liberty Specialty Markets Bermuda Ltd.
Lloyd's Consortium - 9489 Equinox (Lectio)
Lloyd's of London
Lloyds- Syndicate 5000
Mapfre Global Risks
Markel Bermuda Ltd.

Markel International Services Ltd.
MS Amlin Asia Pacific Pte. Ltd.
Munich Re
Munich Re Lloyd's Syndicate
National Fire & Marine Insurance Co.
National Union Fire Insurance Co. of Pittsburgh, PA.
Navigators Group Inc., The
Nickerson Insurance Services Inc.
NOA Lloyd's Syndicate
Palomar Excess And Surplus Insurance Co.
Price Forbes
QBE UK Ltd.
Revau Advanced Underwriting Inc.
Scor UK Co. Ltd.
Starr Surplus Lines Insurance Co.
Talbot Lloyd's Syndicate
Talbot Underwriting Ltd.
Twin City Fire Insurance Co.
Underwriters At Lloyds
United Specialty Insurance Co. (Korean Re)
Various Lloyd's of London Syndicates
Westchester Surplus Lines Insurance Co.
Westfield Insurance Co.
Westfield National Insurance Co.
Westfield Specialty Insurance
WRB Lloyd's Syndicate
XL Specialty Insurance Co.
Zurich American Insurance Co.

Known Affiliates

Camelina Co. España SLU
Global Clean (Canada) Renewable Fuels ULC
Global Clean Renewable (Argentina) SRL
Global Clean Renewable (Brasil) Ltda.

Litigants

[Individual – Redacted]
CTCI Americas Inc.
CTCI Group
[Individual – Redacted]
Herman Weissker Inc.
[Individual – Redacted]
[Individual – Redacted]
[Individual – Redacted]
[Individual – Redacted]
[Individual – Redacted]

Pts Advance

[Individual – Redacted]

M&A Counterparties

[Confidential – Filed Under Seal]

Other Significant Creditors

CTCI Americas Inc.

Potential Ordinary Course Professionals

King & Spalding LLP

Significant Customers

Midstream Energy Partners USA LLC

Vitol Americas Corp.

Significant Equity Holders

Cede & Co.

Pacific Sequoia Holdings LLC

[Individual – Redacted]

[Individual – Redacted]

Surety & Letters of Credit-Beneficiaries

California, State of

United States, Government of the, Environmental Protection Agency

Surety & Letters of Credit-Issuers

California, State of, Natural Resources Agency

Colorado, State of, Department of Agriculture

Crum & Forster Insurance Co.

Hanover Insurance Co., The

Travelers Casualty & Surety Co. of America

Taxing Authorities, Governmental, and Regulatory Authorities

California Incentives Group

California, State of, Alternative Energy & Advanced Transportation Financing Authority

California, State of, Department of Food & Agriculture

California, State of, Department of Motor Vehicles

California, State of, Department of Public Health

California, State of, Department of Tax & Fee Administration

California, State of, Employment Development Department

California, State of, Franchise Tax Board

California, State of, Office of State Fire Marshal

California, State of, State Water Resources Control Board

Cascade, County of (MT), Treasurer

Delaware, State of

Florida, State of, Department of Revenue

Harper, County of (KS), Treasurer
Illinois, State of, Department of Employment Security
Kansas, State of, Department of Revenue
Kansas, State of, Secretary of State
Kern County Water Agency (CA)
Kern, County (CA), Department of Agriculture & Measurement Standards
Kern, County of (CA), EHS Division
Kern, County of (CA), Treasurer
Los Angeles, County of (CA), Tax Collector
Minnesota Unemployment Insurance
Minnesota, State of, Department of Employment and Economic Development
Montana, State of, Department of Agriculture
Montana, State of, Department of Revenue
Montana, State of, Secretary of State
Oregon, State of, Department of Agriculture
Pennsylvania, Commonwealth of, Department of Revenue
San Joaquin Valley Air Pollution Control District
Tennessee, State of, Department of Labor
Tennessee, State of, Department of Labor & Workforce
United States, Government of the, Department of Agriculture
United States, Government of the, Department of The Treasury
United States, Government of the, Department of the Treasury, Internal Revenue Service
United States, Government of the, Environmental Protection Agency, US Ecology Nevada Inc.
Washington, State of, Department of Agriculture
Washington, State of, Employment Security Department
Wyoming, State of, Department of Agriculture

U.S. Trustee Personnel for the Southern District of Texas (and key staff members)

Barcomb, Alicia
Bublick, Asher
Caluza, Alethea
Castro, Tiffany D.
Chapman, E'Lon B.
Chilton, Samantha
Coughlin, Erin
Croop, Kara
Csabi, Rebekah
Duhon, Dariel
Duran, Adrian
Duran, Hector
Epstein, Kevin M.
Feinstein, Carolyn
Flannery, Jeremy
Freimuth, Reinhard
Gaona, Mayra
Garnica, Fernando

Garza, Vianey
Gerhard, Ivette
Goodier, C. Marie
Hanzlik, Jessica L.
Henault, Brian
Henicke, Genny
Hersh, Susan
Hughes, Alexandria
Javed, Aamer
Jimenez, Andrew
Jones, Omar E.
Kippes, Meredyth
Krishnan, Rajalakshmi
Lambert, Lisa L.
Motton, Linda
Nguyen, Ha
Otto, Glenn
Palos, Felicia P.
Peake, David G.
Resnick, Nancy S.
Rivera, Yasmine
Roman, Melissa
Rose, Jim
Ruff, Jayson B.
Russell, Jason
Rust, Kendra M.
Salitore, Marc F.
Sall, Millie Aponte
Samko-Yu, Alina
Savannah, Tisha
Schmidt, Erin
Simmons, Christy
Smith, Gwen
Suchedina, Rafay
Sughrue, Catherine L.
Thomas, Aubrey
Thompson, Christi C.
Tobin, Shane P.
Tompkins, Carey A.
Travis, Christopher R.
Valdez, Yvonne
Vardeman, John M.
Whitehurst, Steven
Whitworth, Jana
Wilcoxson, Cheryl H.
Wright, Gary

Young, Elizabeth

Utilities

3 Rivers Communications LLC
AT&T Inc.
BP Energy Co. Inc.
California Water Service
Chemical Waste Management Inc.
Chevron USA Inc.
Energy West Inc.
Evoqua Water Technologies LLC
Great Falls, City of (MT)
Harper, City of (KS)
Kern County Water Agency (CA)
MAP Communications Inc.
Momentum Telecom Inc.
Northwestern Energy Group Inc.
PG&E Corp.
SoCalGas
Varner Bros Inc.
Verizon Business Global LLC
Wheatland Electric Cooperative Inc.

Vendors

Accudata Systems LLC
AGI Suretrack LLC
AIS-Advanced Industrial Services Inc.
Alliance Technical Group LLC
Alliant Insurance Services Inc.
Ancon Marine
Archer Daniels Midland Co.
Ardonagh Specialty Ltd.
Arkema Inc.
Becht Engineering Co. Inc.
Becht Industrial Group LLC
Blue Shield of California
BMS Bermuda Ltd.
BNSF Railway Co.-Freight
Board of Trustees of Michigan State University
BP Energy Co. Inc.
Bragg Cos.
Brand Scaffold Services Inc.
C.L. Knox Inc.
CAM Integrated Solutions LLC
Chevron USA Inc.
Coastal Chemical Co. LLC

Contra Costa Electric Inc.
Curtis Electrical Construction Inc.
Cust-O-Fab Specialty Services LLC
DeepIQ Inc.
Diversified Project Services International Inc.
EarthOptics Inc.
Eaton Ranch
Edgewood Partners Insurance Center Inc.
Emerson LLLP
Entara LLC
EquipmentShare.com Inc.
Equity Engineering Group Inc.
Evoqua Water Technologies LLC
Flowserve US Inc.
FR Integrity LLC
Freepoint Commodities LLC
Geosys-International Inc.
Grant Thornton LLP
Honeywell International Inc.
IntelinAir Inc.
Iowa State University Foundation
JG Boswell Co.
John Zink Co. LLC
Kern, County of (CA), Treasurer - Tax Collector
King & Spalding LLP
Lake Forest Bank & Trust Co. NA
Linde Engineering North America LLC
Linde Inc.
Marubeni American Corp.
Mid-Cal Technical LLC
Milmac Inc.
Mistras Group Inc.
Molecule Software Inc.
Nalco Water
Nations Roof West LLC
NES Global LLC
Oil Well Service Co.
On Grid Infrastructure Services LLC
Parsons Environment & Infrastructure Group Inc.
PG&E Corp.
PTS Advance
Railworks Track Services Inc.
Ramp Card
[Individual – Redacted]
San Joaquin Valley Air Pollution Control District
Savage Services Corp.

Schneider Electric Systems USA Inc.
Schwebel Petroleum Co. Inc.
Siemens Energy Inc.
Silvas Oil Co. Inc.
Sirius Solutions LLLP
Stantec Consulting Services Inc.
Strategic Contract Resources LLC
Streamline Innovations Inc.
Surface Pumps Inc.
Sustainable Oils Inc.
Topsoe Inc.
Transamerica Corp.
Trans-West Services Inc.
Trinity Safety Co. LLC
Unified Field Services Corp.
Union Pacific Railroad Co.
United Grain Corp.
United Rentals (North America) Inc.
Universal Plant Services Inc.
Vitol Americas Corp.
West Coast Environmental Solutions Inc.
West Coast Land Service
West Coast Welding & Piping Inc.
Westair Gases & Equipment Inc.
Yard Stick PBC
Zalco Laboratories Inc.

SCHEDULE 2

Current, Former, and Closed Clients

Current¹ Clients²

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a McDermott Client
ExxonMobil Oil Corporation	ExxonMobil Oil Corporation
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
AIG	Validus (Bermuda) Services Limited
	AIG Europe SA
Allianz Global Corporate & Specialty SE	PIMCO
	Allianz Resolution Management
	Allianz Partners
	Unsere Grüne Glasfaser GmbH & Co. KG
	PIMCO Europe Ltd
	Allianz Risk Transfer AG
Alvarez & Marsal Holdings LLC	AMPWP
	Alvarez & Marsal, Inc.
Amlin Lloyd's Syndicate	MS Amlin Underwriting Limited
	MS Amlin AG
Amwins Insurance Brokerage LLC	Amwins Group, Inc.
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
Arch Insurance International	Arch Mortgage Insurance
Argenta Syndicate Management Ltd.	Argenta Syndicate Management Limited
Aspen's Lloyd's Syndicate	Aspen Bermuda Limited
	Aspen Insurance (UK) Limited
Axis Insurance Co.	Axis Specialty Limited
	Axis Specialty Insurance Limited
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
	[Confidential – Filed Under Seal]
Beazley Insurance	Beazley Furlonge Limited
	Beazley Insurance Company, Inc.
Berkshire Hathaway Inc.	Government Employees Insurance Co.
	Berkshire Hathaway Energy Company f/k/a
	PacifiCorp
	Berkshire Hathaway Homestate Companies
	Berkshire Hathaway Specialty Insurance
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]

¹ The term “current client” means a client to whom time was posted in the 12 months preceding April 30, 2025, the date that the Committee selected McDermott as its proposed counsel.

² McDermott may currently represent or have previously represented certain affiliates of the entities disclosed herein, and the disclosure is accordingly broad in scope.

BNSF Railway Co.-Freight	BNSF Railway Company
BP Energy Co. Inc.	BP Products North American
Brit Group Services Ltd.	Brit Group Services Limited
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Bureau Veritas North America	Bureau Veritas
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
Chaucer Underwriting Services Ltd.	Chaucer Underwriting Services Limited
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
	[Potential Lender – Filed Under Seal]
	[Potential Lender – Filed Under Seal]
Convex Insurance UK Ltd.	Convex Insurance UK Limited
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
Crum & Forster Insurance Co.	Crum & Forster Specialty Insurance Compa
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
	[Potential Lender – Filed Under Seal]
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
	[Confidential – Filed Under Seal]
	[Confidential – Filed Under Seal]
Everest National Insurance Co.	Everest Insurance
Evoqua Water Technologies LLC	Xylem Inc.
	Evoqua Water Technologies LLC
Fidelis Underwriting Ltd.	Fidelis Underwriting Limited
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Grant Thornton LLP	Grant Thornton LLP
Great American Insurance Co.	MassMutual
	Great American Life Insurance Company
Great Lakes Insurance SE	Great Lakes Insurance SE
HDI Global Specialty SE	HDI Global Specialty SE
Hiscox Syndicates Ltd.	Hiscox Insurance Company (Bermuda) Limit
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
HSB Specialty Insurance Co.	Hartford Steam Boiler Inspection and Ins
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
International General Insurance Co. (UK) Ltd.	International General Insurance Co. Ltd.
Iowa State University Foundation	Iowa State University Foundation
Jones Environmental Inc.	Johnson Controls International Plc
	Jones Environmental (UK) Limited
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Haynes & Boone	Haynes & Boone, LLP
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]

[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Lancashire Insurance Co. (UK) Ltd.	Lancashire Insurance Company Limited
Lazard Group LLC	Lazard Freres & Company
Liberty Specialty Markets Bermuda Ltd.	Liberty Mutual Insurance
	Liberty Mutual Insurance Group
Linde Inc.	Linde AMT GmbH
Lloyd's of London	Lloyd's America, Inc.
MAP Communications Inc.	MAP Communications, Inc.
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
MS Amlin Asia Pacific Pte. Ltd.	MS Amlin Underwriting Limited
	MS Amlin AG
Munich Re	Munich Reinsurance America, Inc.
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
	[Confidential – Filed Under Seal]
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Pentair-Confidentiality Agreement	Pentair plc
PG&E Corp.	Pacific Gas & Electric (PG&E)
QBE UK Ltd.	QBE UK Limited
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Savage Services Corp.	Savage Services Corporation
Schneider Electric Systems USA Inc.	Schneider Electric
Siemens Energy Inc.	Siemens Corporation
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
SoCalGas	Sempra Energy Corp.
	Southern California Gas Company
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
Travelers Casualty & Surety Co. of America	Travelers Management Limited
U.S. Bank NA	U.S. Bank
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
USA Debusk LLC	H.I.G. Middle Market
	USA DeBusk LLC
Verizon Business Global LLC	Verizon Wireless, Inc.
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
WRB Lloyd's Syndicate	W.R. Berkley Corporation
Zurich American Insurance Co.	Zurich American Insurance Company

Former¹ Clients

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a McDermott Client
Entara LLC	Entara Partners
Alliant Insurance Services Inc.	Alliant Insurance Services, Inc.
Allianz Global Corporate & Specialty SE	San Francisco Reinsurance (ARM US), Fire
Berkshire Hathaway Inc.	TTI, Inc.
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Norton Rose Fulbright LLP	Norton Rose Fulbright Canada LLP

¹ The term “former client” means a client to whom time was posted between 12 and 36 months preceding April 30, 2025, the date that the Committee selected McDermott as its proposed counsel, but for whom no time has been posted in the 12 months preceding April 30, 2025.

Closed¹ Clients

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a McDermott Client
[Confidential – Filed Under Seal]	[Confidential – Filed Under Seal]
	[Confidential – Filed Under Seal]
Board of Trustees of Michigan State University	Michigan State University
[Potential Lender – Filed Under Seal]	[Potential Lender – Filed Under Seal]
Norton Rose Fulbright LLP	Norton Rose

¹ The term “closed client” means a client to whom time was posted in the 36 months preceding April 30, 2025, the date the Committee selected McDermott as its proposed counsel, but for which the client representation has been closed.

EXHIBIT C

Declaration of Paul Bowmar

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

In re:)	
)	Chapter 11
)	
GLOBAL CLEAN ENERGY HOLDINGS, INC.)	Case No. 25-90113 (ARP)
<i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	

**DECLARATION OF PAUL BOWMAR IN SUPPORT
OF THE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF MCDERMOTT
WILL & EMERY LLP AS COUNSEL, EFFECTIVE AS OF APRIL 30, 2025**

I, Paul Bowmar, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am over the age of 21, and I am the Chair of the Committee. I am, in all respects, competent to make this declaration in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel, Effective as of April 30, 2025* (the “Application”) filed contemporaneously herewith.²

2. This declaration is provided pursuant to ¶ D.2 of the Appendix B Guidelines. I am informed by Committee counsel that the Appendix B Guidelines request that any application for employment of an attorney under Bankruptcy Code sections 327, 328, 330, and 1103(a) be accompanied by a verified statement from the client that addresses the following:

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

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

- (a) The identity and position of the person making the verification.
- (b) The steps taken by the client to ensure that the applicant's billing rates and material terms for the engagement are comparable to the applicant's billing rates and terms for other non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.
- (c) The number of firms the client interviewed.
- (d) If the billing rates are not comparable to the applicant's billing rates for other non-bankruptcy engagements and to the billing rates of other comparably skilled professionals, then the circumstances warranting the retention of that firm.
- (e) The procedures the client has established to supervise the applicant's fees and expenses and to manage costs. If the procedures for the budgeting, review and approval of fees and expenses differ from those the client regularly employs in non-bankruptcy cases to supervise outside general counsel, explain how and why. In addition, describe any efforts to negotiate rates, including rates for routine matters, or in the alternative to delegate such matters to less expensive counsel.

I. Identity of the Declarant

3. On April 28, 2025, I was appointed to the Committee. I was subsequently elected Chair of the Committee. Under the *Bylaws of the Official Committee of Unsecured Creditors of Global Clean Energy Holdings Inc., et al.*, (the "Bylaws"), the Chair of the Committee, by and through its representative, is authorized to implement decisions of the Committee in accordance with the Bylaws.

4. I, through my counsel, was directly involved in the Committee's decision to retain McDermott as the Committee's counsel in the Chapter 11 Cases and participated in negotiating the terms of McDermott's employment together with the other members of the Committee.

II. Steps Taken to Ensure Comparability of Engagement Terms

5. I have confirmed with McDermott that, while McDermott's billing rates vary from attorney to attorney based on such facts as the attorney's seniority and position with the firm (*e.g.*, partner, counsel, or associate), years of experience, and the demand for services in the attorney's

particular area of expertise, their billing rates do not vary as a function of whether the services performed relate to a bankruptcy engagement or a non-bankruptcy engagement.

6. The Committee has been informed that McDermott endeavors to set the hourly rates for its attorneys and paraprofessionals at levels competitive to those charged by firms with which it competes.

III. Number of Firms Interviewed

7. On April 30, 2025, the Committee evaluated the breadth of certain firms' experience and particular areas of expertise, the firms' prior history of representing committees in chapter 11 cases, and the anticipated attorneys' fees to be billed in connection with the Chapter 11 Cases. The Committee considered 7 firms and interviewed 5 firms for the position of its counsel in the Chapter 11 Cases on April 30, 2025. At the conclusion of the interviews, the Committee selected McDermott to serve as its counsel in the Chapter 11 Cases, subject to Court approval.

8. The Committee selected McDermott as its counsel because, among other things, of the firm's extensive experience and knowledge in the field of creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. The Committee believes that McDermott is well-qualified to represent its interests in the Chapter 11 Cases.

IV. Other Circumstances Warranting Retention of McDermott

9. The Committee has determined that McDermott's attorneys' billing rates are set each year to ensure that their rates are in line with the billing rates of other comparably skilled professionals at law firms in McDermott's peer group. This, coupled with McDermott's previous experience as committee counsel in numerous chapter 11 cases, makes McDermott the appropriate choice for Committee counsel in the Chapter 11 Cases.

V. Procedures Established to Supervise Fees and Expenses and Manage Costs

10. I understand that McDermott's fees and expenses (a) will be subject to review, comment, and objection (if warranted), and Court approval pursuant to any further orders of this Court, and (b) will be subject to the periodic review on an interim and final basis during the course of the Chapter 11 Cases by the U.S. Trustee, the Debtors, and the Committee.

11. During the Chapter 11 Cases, I and/or the other members of the Committee will monitor McDermott's interim fee applications to ensure that the fees and expenses requested therein are reasonable in nature and correspond to necessary or beneficial services rendered on behalf of the Committee. To the extent the Committee has an objection to the fees and expenses requested by McDermott in any interim fee statement that cannot be resolved to the Committee's satisfaction informally, McDermott has informed me that it will file a notice of objection on the Committee's behalf pursuant to any further orders of the Court. In so doing, I understand that McDermott reserves all rights to contest any such objection raised to the allowance or payment of its requested fees and expenses, and the Committee reserves the right to retain conflicts counsel to prosecute any such objection to the extent it cannot be resolved informally by the parties.

12. Nothing contained in the foregoing is intended either to limit McDermott's ability to request allowance and payment of fees and expenses pursuant to Bankruptcy Code sections 330 and 331, or to restrict McDermott's right to defend against any objection with respect to the allowance or payment of such fees or retain conflicts counsel to prosecute any such fee objection to the extent it is not resolved informally by the parties or raised by another party in interest, such as the U.S. Trustee.

VI. Other Matters

13. McDermott's hourly rates are subject to annual adjustments in January of each year to reflect economic and other conditions. I have been advised by Committee counsel that, pursuant to

ABA Formal Ethics Opinion 11-458, “[p]eriodic, incremental increases in a lawyer’s regular hourly billing rates are generally permissible if such practice is communicated clearly to and accepted by the client at the commencement of the client-lawyer relationship and any periodic increases are reasonable under the circumstances.” I have also been specifically advised by Committee counsel that, pursuant to ABA Formal Ethics Opinion 11-458, “the client need not agree to pay the modified fee to have the lawyer continue the representation.” McDermott disclosed to the Committee its rates in effect as of January 1, 2025.

[Remainder of page intentionally left blank]

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

Executed on May 29, 2025

By: /s/ Paul Bowmar
Paul Bowmar of Castleton Commodities Merchant
Trading L.P., By Castleton Commodities Trading GP
LLC, its General Partner

Solely in his capacity as Chair of the Official
Committee of Unsecured Creditors of Global Clean
Energy Holdings Inc., *et al.*

CERTIFICATE OF SERVICE

I certify that on May 29, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs

Charles R. Gibbs