

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BUDDY MAC HOLDINGS, LLC, <i>et al.</i> ,	§	Case No. 25-34839
	§	
Debtors. ¹	§	(Joint Administration Requested)
	§	

**SUPPLEMENTAL DECLARATION OF KYLE WOODARD IN SUPPORT OF
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF KANE RUSSELL COLEMAN LOGAN PC AS COUNSEL FOR
THE DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

[Re: ECF No. 67]

I, Kyle Woodard, pursuant to 28 U.S.C. §1746, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am an attorney admitted and in good standing to practice in the State of Texas and in the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas. I am a director of the law firm of Kane Russell Coleman Logan PC (the “Firm”), proposed counsel for the debtors and debtors-in-possession in the above-referenced chapter 11 cases (collectively, the “Debtors”). I submit this Supplemental Declaration in support of the *Debtors*’

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax ID number, are: Buddy Mac Holdings, LLC (1297); BMH RTO, LLC (9489); Buddy Mac Twenty-One, LLC (1269); Buddy Mac Twenty-Two, LLC (6474); Buddy Mac Twenty-Three, LLC (3668); Buddy Mac Twenty-Four, LLC (3328); Buddy Mac Twenty-Five, LLC (5604); Buddy Mac Twenty-Six, LLC (5425); Buddy Mac Twenty-Seven, LLC (1574); BMH-TNM 28, LLC (5391); BMH-TNM 29, LLC (0350); BMH-TNM 30, LLC (5692); BMH-TNM 31, LLC (5137); BMH-TNM 32, LLC (3430); BMH-TNM 33, LLC (8037); BMH-RCL 34, LLC (7055); BMH-RCL 35, LLC (7332); BMH-RCL 36, LLC (4707); BMH-RCL 37, LLC (4598); BMH-RCL 38, LLC (7218); BMH-RCL 39, LLC (5340); BMH-RCL 40, LLC (8100); BMH-RCL 41, LLC (5735); BMH-RCL 42, LLC (3438); BMH-FAN 43, LLC (8956); BMH-FAN 44, LLC (9133); BMH-FAN 45, LLC (1642); BMH-FAN 46, LLC (1756); BMH-FAN 47, LLC (7435); BMH-FAN 48, LLC (7860); BMH-FAN 49, LLC (8079); BMH-FAN 50, LLC (8219); BMH-FAN 51, LLC (5786); BMH-FAN 52, LLC (6191); BMH-FAN 53, LLC (6281); BMH-FAN 54, LLC (6340); BMH-SM 79, LLC (9545); BMH-SM 80, LLC (9640); BMH-SM 81, LLC (9709); BMH-SM 82, LLC (0107); BMH-SM 83, LLC (0236); BMH-SM 84, LLC (0340); BMH-SM 85, LLC (2526); BMH-SM 86, LLC (2731); BMH-SM 87, LLC (2817); Buddy Mac One, LLC (0935); BMH One RE, LLC (4305); BMH 95 RE Caruthersville, LLC (1264); and BMH 96 RE Marion, LLC (0659). The Debtors’ service address is 400 E. Centre Park Blvd., Suite 101, DeSoto, Texas 75115.

*Application for Entry of an Order Authorizing the Retention and Employment of Kane Russell Coleman Logan PC as Counsel for the Debtors, Effective as of the Petition Date [ECF #67] (the “Application”).*²

2. Prior to the Petition Date, the Firm received a retainer of \$575,000.00 (the “Retainer”) for legal services performed and to be performed for the Debtors, including the commencement and prosecution of these chapter 11 cases and to provide advice to the Debtors. The Retainer was initially funded in the amount of \$500,000.00, and prior to the Petition Date, the Firm received an additional payment of \$75,000.00 for the Debtors’ chapter 11 filing fees.

3. The Retainer was funded by BMH-HR, LLC, which is not a debtor in these cases. It is my understanding that BMH-HR, LLC is a subsidiary of Buddy Mac Holdings, LLC.

4. Prior to the Petition Date, the Firm applied \$318,932.80 of the Retainer to its pre-petition professional fees and expenses incurred prior to the Petition Date, including \$240,722.80 for professional fees and \$78,210.00 for chapter 11 filing fees and other expenses. The Firm is holding the balance of the Retainer (\$256,067.20) in its IOLTA trust account.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on January 12, 2026
Dallas County, Texas

/s/ Kyle Woodard

Kyle Woodard
TX Bar No. 24102661

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