

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

| | | |
|---|---|------------------------|
| In re: | § | |
| | § | Chapter 11 |
| | § | |
| SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i> , | § | |
| | § | Case No. 20-32243 (MI) |
| | § | |
| Debtors. ¹ | § | (Jointly Administered) |
| | § | |

**NOTICE OF FILING OF REVISED PROPOSED ORDER
(I) APPROVING DEBTORS’ PROPOSED FORM OF ADEQUATE
ASSURANCE OF PAYMENT TO UTILITY COMPANIES; (II) ESTABLISHING
PROCEDURES FOR RESOLVING OBJECTIONS BY UTILITY COMPANIES;
(III) PROHIBITING UTILITY COMPANIES FROM ALTERING, REFUSING,
OR DISCONTINUING SERVICE; AND (IV) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT, on April 23, 2020, SpeedCast International Limited and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), filed the *Emergency Motion of Debtors for an Order (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief* (Docket No. 7) (the “Motion”), with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “Initial Proposed Order”).

PLEASE TAKE FURTHER NOTICE THAT, the Debtors hereby file a revised proposed *Order (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies;*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kecllc.net/speedcast>. The Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.



(III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service; and
(IV) Granting Related Relief, attached hereto as **Exhibit A** (the “**Revised Proposed Order**”).

PLEASE TAKE FURTHER NOTICE THAT, a redline of the Revised Proposed Order marked against the Initial Proposed Order is attached hereto as **Exhibit B**.

Dated: April 25, 2020
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on April 25, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' proposed claims, noticing, and solicitation agent.

/s/ Alfredo R. Pérez
Alfredo R. Pérez

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

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| In re: | § | |
| | § | Chapter 11 |
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| SPEEDCAST INTERNATIONAL LIMITED, et al., | § | |
| | § | Case No. 20-32243 (MI) |
| | § | |
| Debtors.¹ | § | (Jointly Administered) |
| | § | Re: Docket No. 7 |

ORDER (I) APPROVING DEBTORS’ PROPOSED FORM OF ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES; (II) ESTABLISHING PROCEDURES FOR RESOLVING OBJECTIONS BY UTILITY COMPANIES; (III) PROHIBITING UTILITY COMPANIES FROM ALTERING, REFUSING, OR DISCONTINUING SERVICE; AND (IV) GRANTING RELATED RELIEF

Upon the motion, dated April 23, 2020 (the “**Motion**”)² of SpeedCast International Limited and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), for entry of an order pursuant to sections 366 and 105(a) of the Bankruptcy Code and Bankruptcy Rules 6003 and 6004 (i) approving Debtors’ proposed form of adequate assurance of payment to the Utility Companies, (ii) establishing procedures for resolving objections by the Utility Companies, (iii) prohibiting the Utility Companies from altering, refusing, or discontinuing service, and (iv) granting related relief, all as more fully set forth in the Motion; and upon consideration of the Healy Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §1334; and consideration of the Motion and the

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

requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and this Court having held a hearing to consider the relief requested in the Motion; and all objections, if any, to the Motion have been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtors and their estates as contemplated by Bankruptcy Rule 6003 and is in the best interests of the Debtors and their respective estates and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Adequate Assurance shall constitute adequate assurance of future payment as required by section 366 of the Bankruptcy Code.
2. The Debtors shall deposit the Adequate Assurance Deposit in the amount of \$196,000 in a newly created, segregated account for the benefit of the Utility Companies within 20 days after the Petition Date.
3. All Utility Companies including, without limitation, those listed on **Exhibit 1** annexed hereto, are prohibited from altering, refusing, or discontinuing Utility Services, or otherwise discriminating against the Debtors, on account of any unpaid prepetition charges or any perceived inadequacy of the Debtors' Proposed Adequate Assurance.
4. The following Adequate Assurance Procedures are hereby approved:

- a. Within three business days after entry of this Order, the Debtors will fax, e-mail, serve by mail, or otherwise expeditiously send a copy of the Motion and this Order to the Utility Companies on the Utility Services List.
- b. The Debtors will deposit the Adequate Assurance Deposit, in the aggregate amount of \$196,000, in the Utility Deposit Account within 20 days after the Petition Date.
- c. The funds in the Utility Deposit Account shall constitute adequate assurance for each Utility Company in the amount set forth for such Utility Company in the column labeled “Proposed Adequate Assurance” on the Utility Services List.
- d. If an amount relating to Utility Services provided postpetition by a Utility Company is unpaid, and remains unpaid beyond any applicable grace period, such Utility Company may request a disbursement from the Utility Deposit Account by giving notice to (i) proposed counsel to the Debtors, Weil, Gotshal & Manges LLP, 700 Louisiana Street, Suite 1700, Houston, TX 77002 (Attn: Brenda Funk, Esq. and Stephanie Morrison, Esq.), (ii) the Office of the United States Trustee, 515 Rusk Street, Suite 3516, Houston, TX 77002, (iii) counsel to the Ad Hoc Group of Secured Lenders, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017 (Attn: Damian S. Schaible, Esq. and David Schiff, Esq.), and (iv) counsel for any official committee of unsecured creditors appointed in these chapter 11 cases (collectively, the “**Utility Notice Parties**”). The Debtors shall honor such request within five business days after the date the request is received by the Debtors, subject to the ability of the Debtors and any such requesting Utility Company to resolve any dispute regarding such request without further order of the Court. To the extent a Utility Company receives a disbursement from the Utility Deposit Account, the Debtors will replenish the Utility Deposit Account in the amount so disbursed.
- e. The portion of the Adequate Assurance Deposit attributable to each Utility Company will be returned to the Debtors on the earlier of (i) reconciliation and payment by Debtors of the Utility Company’s final invoice in accordance with applicable nonbankruptcy law following the Debtors’ termination of Utility Services from such Utility Company and (ii) the effective date of any chapter 11 plan confirmed in these chapter 11 cases.
- f. Any Utility Company desiring additional assurances of payment in the form of deposits, prepayments, or otherwise must serve a request for additional assurance (an “**Additional Assurance Request**”) on the Utility Notice Parties.

- g. The Additional Assurance Request must (i) be made in writing, (ii) set forth the location(s) for which Utility Services are provided, the account number(s) for such location(s), and the outstanding balance for each such account, (iii) explain why the Utility Company believes the Adequate Assurance Deposit is not adequate assurance of payment, (iv) summarize the Debtors' payment history relevant to the affected account(s), (v) certify the amount that is equal to one half of monthly Utility Services provided by the Utility Company to the Debtors, calculated as a historical average over the 9-month period preceding the Petition Date, and (vi) certify that the Utility Company does not already hold a deposit equal to or greater than one half of monthly Utility Services provided by such Utility Company.
- h. An Additional Assurance Request may be made at any time. If a Utility Company does not file and serve an Additional Assurance Request, the Utility Company will be (i) deemed to have received "satisfactory" adequate assurance of payment in compliance with section 366 of the Bankruptcy Code and (ii) forbidden from discontinuing, altering, or refusing Utility Services to, or discriminating against, the Debtors on account of any unpaid prepetition charges or requiring additional assurance of payment other than the Proposed Adequate Assurance.
- i. Upon the Debtors' receipt of an Additional Assurance Request, the Debtors will negotiate with such Utility Company to resolve such Utility Company's Additional Assurance Request.
- j. The Debtors may, without further order from the Court, resolve an Additional Assurance Request by mutual agreement with a Utility Company, and the Debtors may, in connection with any such agreement, with the consent of the Required IC DIP Lenders (as defined in the DIP Order), not to be unreasonably withheld, provide a Utility Company with additional adequate assurance of payment including cash deposits, prepayments, or other forms of security if the Debtors believe that such adequate assurance is reasonable, subject to the terms of any collateral orders entered by the Court.
- k. If the Debtors and the Utility Company are not able to reach an alternative resolution within 30 days of receipt of the Additional Assurance Request, the Debtors will request a hearing before the Court at the next regularly scheduled omnibus hearing to determine the adequacy of assurances of payment with respect to a particular Utility Company (the "**Determination Hearing**") pursuant to section 366(c)(3) of the Bankruptcy Code.
- l. Pending resolution of the Determination Hearing, the Utility Company filing such Additional Assurance Request will be prohibited from altering, refusing, or discontinuing Utility Services to the Debtors on account of

unpaid charges for prepetition services or on account of any objections to the Proposed Adequate Assurance.

5. Notwithstanding anything in this Order, upon a timely motion filed and served on the Utility Notice Parties by any Utility Company, the Court shall conduct a hearing on **May 21, 2020 at 2:00 p.m. (prevailing Central Time)** (the “**Final Hearing**”) to resolve any dispute between the Debtors and such Utility Company regarding the Adequate Assurance Procedures of the Proposed Adequate Assurance.

6. The Utility Companies are prohibited from requiring additional adequate assurance of payment other than pursuant to the Adequate Assurance Procedures.

7. The Adequate Assurance Deposit shall automatically, without further Court order, be available to the Debtors upon the effective date of a chapter 11 plan for the Debtors.

8. The inclusion of any entity in, as well as any omission of any entity from, the Utility Services List shall not be deemed an admission by the Debtors that such entity is, or is not, a utility within the meaning of section 366 of the Bankruptcy Code, and the Debtors reserve all rights and defenses with respect thereto.

9. The Debtors are authorized to amend the Utility Services List to the extent the Debtors terminate the services of any Utility Company or identify additional Utility Companies, with the consent of the Ad Hoc Group of Secured Lenders, not to be unreasonably withheld, with such amendment to be filed with the Court and served in time to allow for parties to object prior to the Final Hearing. This Order shall apply to any such Utility Company that is added to the Utility Services List. The Debtors shall serve a copy of this Order and the Motion upon any Utility Company added to the Utility Services List within three (3) business days.

10. The Debtors shall increase the amount of the Adequate Assurance Deposit if an additional Utility Company is added to the Utility Services List by an amount equal to one half of monthly Utility Services provided by such additional Utility Company, calculated using the historical average for such payments during the 9 months prior to the Petition Date.

11. Notwithstanding paragraph 9 hereof, the Debtors may terminate the services of any Utility Company at any time and, following the deposit of the Adequate Assurance Deposit in the Utility Deposit Account, are immediately authorized to reduce the Adequate Assurance Deposit by the amount held on account of such terminated Utility Company provided there are no outstanding disputes related to postpetition payments due.

12. The relief granted herein is for all Utility Companies providing Utility Services to the Debtors and is not limited to those parties or entities listed on the Utility Services List.

13. Notwithstanding anything to the contrary herein, any payment to be made by the Debtors pursuant to the authority granted herein shall be subject to and in compliance with any orders entered by the Court approving the Debtors' (1) entry into any postpetition debtor in possession financing facility, including any budget and the terms of any definitive documentation in connection therewith (the "**DIP Documents**"), and/or (2) authorizing the Debtor's use of cash collateral and/or any budget in connection therewith (in either case, the "**DIP Order**"). To the extent there is any inconsistency between the terms of the DIP Order or any DIP Documents, on the one hand, and any action taken or proposed to be taken hereunder, on the other hand, the terms of the DIP Order or such DIP Document, as applicable, shall control.

14. Nothing contained in the Motion or this Order or any payment made pursuant to the authority granted by this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

15. The requirements of Bankruptcy Rule 6003(b) have been satisfied.

16. Notice of the Motion is adequate under Bankruptcy Rule 6004(a).

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

18. The Debtors are authorized to take all reasonable actions necessary or appropriate to carry out the relief granted in this Order.

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

Dated: _____, 2020
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Utility Services List

Utility Services List

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---------------------------------|--|--------------------------------|-------------------------|-----------------------------|
| Florida Power & Light Company | 700 Universe Blvd Juno Beach, FL 33408 | Electricity | \$12,751.03 | \$6,375.52 |
| Sun Coast Resources, Inc. | PO Box 202603 Dallas, TX 75320 | Fuel | \$458.06 | \$229.03 |
| Waste Management Inc Of Florida | PO Box 4648 Carol Stream, IL 60197 | Waste Disposal | \$107.82 | \$53.91 |
| BFI Waste Services of Texas, LP | 18500 N. Allied Way Dallas, TX 75284-1833 | Waste Disposal | \$1,862.04 | \$931.02 |
| River Parish Disposal, LLC | PO Box 10482 New Orleans, LA 70181 | Waste Disposal | \$231.64 | \$115.82 |
| Entergy Corporation | PO Box 8108 Baton Rouge, LA 70891-8108 | Electricity | \$1,559.38 | \$779.69 |
| Direct Energy | PO Box 70220 Philadelphia, PA 19176 | Electricity | \$14,108.49 | \$7,054.25 |
| City of Houston Water | PO Box 1560 Houston, TX 77251 | Water | \$1,169.23 | \$584.61 |
| Amerigas Propane, Inc. | PO Box 105018 Atlanta, GA 30348-5018 | Fuel | \$137.32 | \$68.66 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---------------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| SSE Business Energy | Robert Brown House Basingstoke RG21 8GZ Great Britain | Electricity | \$311.86 | \$155.93 |
| Scottish Hydro Electric | Grampian House Perth ND PH1 3GH Great Britain | Electricity | \$1,473.07 | \$736.54 |
| Clear Business | Longley House, Longley Lane Manchester M22 4SY Great Britain | Water | \$27.59 | \$13.79 |
| Hudson Energy Supply UK | 219-225 Avebury Boulevard Milton Keynes MK9 1AU Great Britain | Electricity | \$89,611.16 | \$44,805.58 |
| Aberdeen Electrical Services Limited | Unit 6 109 Urquhart Road Aberdeen AB24 5NH Great Britain | Electricity | \$8,737.23 | \$4,368.62 |
| Anglian Water Business (National) Ltd | PO Box 259 Rotherham S98 1QU Great Britain | Water | \$3,251.07 | \$1,625.53 |
| Scottish Fuels | Tryst House Glenbervie Business Park Larbert, FK5 4RB Great Britain | Fuel | \$4,768.37 | \$2,384.18 |
| Franzefoss Gjenvinning AS | AVD 19 - FORUS Postboks 53, 1309 RUD Norway | Waste Disposal | \$345.55 | \$172.77 |
| Simply Energy | Level 33 Rialto South Tower Melbourne, 3000 Australia | Electricity | \$20,837.60 | \$10,418.80 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|------------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| Taylor Marine | 62 Sparks Road Perth, WA 6166 Australia | Electricity | \$8,953.44 | \$4,476.72 |
| Water Corporation | PO Box 100 Leederville, WA 6902 Australia | Water | \$37.89 | \$18.95 |
| AGL South Australia Pty Ltd | GPO Box 77 Adelaide, 5001 Australia | Electricity | \$746.60 | \$373.30 |
| Synergy | GPO Box U1913 Perth, WA 6845 Australia | Electricity | \$14,908.14 | \$7,454.07 |
| Laser Electrical Magill | 1 Venum Street, Magill, 5072 Australia | Electricity | \$1,110.65 | \$555.32 |
| WA Refuelling | 28 Felspar St Welshpool, WA 6104 Australia | Fuel | \$141.94 | \$70.97 |
| South Australian Water Corporation | GPO Box 1751 Adelaide, SA 5001 Australia | Water | \$175.54 | \$87.77 |
| Jacana Energy | GPO Box 2601, Darwin , NT 0801 Australia | Electricity | \$232.32 | \$116.16 |
| EnergyAustralia | Locked Bag W100 Sydney, FL 1291 Australia | Electricity | \$1,049.01 | \$524.51 |
| Origin Energy Ltd | GPO Box 1199 Adelaide, 5001 Australia | Electricity | \$2,220.26 | \$1,110.13 |
| The Hongkong Electric Company | Hongkong Electric Centre, 44 Kennedy Road, Hong Kong | Electricity | \$455.26 | \$227.63 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| Shell Hong Kong Limited | 35/F, AIA Kowloon Tower, Landmark East, 100 How ming street ,Kwun Tong Kowloon, Hong Kong | Fuel | \$819.53 | \$409.76 |
| E-ON Energy Ltd | Newland House 49 Mount Street Nottingham, NG1 6PG Great Britain | Electricity & Gas | \$3,454.49 | \$1,727.25 |
| SSE Business Energy | No. 1 Forbury Place 43 Forbury Road Reading, RG1 3JH Great Britain | Electricity & Gas | \$157.32 | \$78.66 |
| ENGIE Energie Nederland N.V. | Grote Voort 291 Zwolle, BL 8041 Netherlands | Electricity | \$8,327.82 | \$4,163.91 |
| REMONDIS Nederland B.V. | Dieselstraat 7 Lichtenvoorde, 7131 PC Netherlands | Waste Disposal | \$504.78 | \$252.39 |
| Kenter B.V. | Dijkgraaf 2 Netherlands, Duiven 6921 RL Netherlands | Electricity | \$103.92 | \$51.96 |
| Handy Clean B.V. | Merwede 6 Lelystad, 8226 NA Netherlands | Waste Disposal | \$1,314.33 | \$657.16 |
| Esso Vermeulen & ZN B.V. | Europa-Allee 4 Installatieweg 7 Kampen, 8265 VB Netherlands | Fuel | \$144.17 | \$72.09 |
| LIANDER N.V. | Postbus 50 Duiven, 6920 AB Netherlands | Electricity | \$3,724.56 | \$1,862.28 |
| Vitens N.V. | Oude Veerweg 1 Zwolle, 8019 BE Netherlands | Water | \$71.00 | \$35.50 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---|---|---------------------------------------|--------------------------------|------------------------------------|
| ACA Waste Services Inc | 40 Eads St West Babylon, NY 11704 | Waste Disposal | \$193.58 | \$96.79 |
| PSEG Long Island | 1650 Islip Ave Brentwood, NY 11717 | Electricity | \$129,033.19 | \$64,516.59 |
| National Grid plc | Po Box 11791 Newark, NJ 07101-4791 | Gas | \$4,723.99 | \$2,362.00 |
| National Waste Services, LLC | 1863 Harrison Avenue Bay Shore, NY 11706 | Waste Disposal | \$2,343.88 | \$1,171.94 |
| Suffolk County Water Authority: SCWA | PO Box 9044 Hicksville, NY 11802 | Water | \$224.25 | \$112.12 |
| Paraco Gas Corporation | P.O. BOX 412227 Boston, MA 02241-2227 | Gas | \$56.95 | \$28.48 |
| Tuas Power Supply Pte Ltd | 111 Somerset Rd, #11-09 Singapore 238164 | Electricity | \$57.60 | \$28.80 |
| Summit Electric Supply Co. Inc. | PO Box 848345 Dallas, TX 75284-8345 | Electricity | \$558.80 | \$279.40 |
| Stark Software International Ltd | Sentinel House, 10-12 Massetts Road Horley, Surrey RH6 7DE Great Britain | Gas | \$93.07 | \$46.53 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|-------------------------------------|---|---------------------------------------|--------------------------------|------------------------------------|
| Kleenheat Gas Pty Ltd | PO Box 4184 Myaree Business Centre WA 6960 Australia | Gas | \$41.55 | \$20.78 |
| Arrow Electrical Services Pty. Ltd. | PO Box 25 South Fremantle, 6162 Netherlands | Electrical Services | \$727.67 | \$363.83 |
| WINconnect Pty Ltd | PO Box 217 Hawthorn, VIC 3122 Australia | Electrical Services | \$71.42 | \$35.71 |
| South East Water Corporation | 101 Wells Street Frankston, VIC 3199 Australia | Water | \$9.88 | \$4.94 |
| Enpron | Lavendelheide 7A Drachten, 9202 PD Netherlands | Electricity | \$145.76 | \$72.88 |
| Van Werven Holding B.V. | Postbus 14 Oldebroek, 8096 ZG Netherlands | Waste Disposal | \$40.02 | \$20.01 |
| Con Ed / Constellation | 100 Summit Lake Drive Suite 410 Valhalla, NY 10595-1356 | Electricity | \$11,350.82 | \$5,675.41 |
| Baltimore Gas and Electric Company | P.O. Box 13070 Philadelphia, PA 19101-3070 | Electricity | \$1,991.22 | \$995.61 |
| Danisi Energy Company Inc. | 3205 Route 112 Medford, NY 11763 | Fuel | \$516.70 | \$258.35 |
| Waste Management of Virginia | PO Box 13648 Philadelphia, PA 19101-3648 | Waste Disposal | \$0 | \$0 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---------------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| City Wide Sewer & Drain Service Corp | PO Box 350 Carle Place, NY 11514-0350 | Septic/Sewage | \$376.57 | \$188.28 |
| AAA Action Septic Service LLC | 166 Campbell Acres Road Cleveland, TX 77328 USA | Septic/Sewage | \$133.33 | \$66.67 |
| Waste Management Inc. of Florida | PO Box 4648 Juno Beach, IL 60197-4648 | Waste Disposal | \$300.92 | \$150.46 |
| Joulz Meetbedrijf B.V. | Blaak 8 Rotterdam, 3011TA Netherlands | Electricity | \$103.92 | \$51.96 |
| Waste Connections of Florida | 3840 NW 37th Ct Miami, FL 33142 | Waste Disposal | \$286.99 | \$143.49 |
| City of North Miami | 17011 NE 19 Ave North Miami Beach, FL 33162 | Water | \$103.34 | \$51.67 |
| Dubai Electricity and Water Authority | P.O. Box 564 Dubai U.A.E. | Electricity & Water | \$101.89 | \$50.94 |
| EYDAP | 12 Satovriandou str. Athens, 10432 Greece | Water | \$60.60 | \$6.73 |
| SSE Enterprise Telecoms Ltd. | One Forbury Place, 4th Floor Reading RG1 3JH Great Britain | Telecommunications | \$4,639.55 | \$2,319.78 |
| Lyse AS | PO Box 8124 Stavanger, 4069 Norway | Electricity | \$4,934.04 | \$2,467.02 |

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|----------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| Électricité de France S.A. | TSA 20121 CEDEX 20 LYON, 69937 France | Electricity | \$856.89 | \$428.45 |
| Broadview Networks | PO Box 9242 Uniondale, NY 11555-9242 | Telecommunications | \$3,681.06 | \$1,840.53 |
| Verizon Wireless | Kim Robertson-Corporate Finance P.O. Box 4830 Trenton, NJ 08650-4830 | Telecommunications | \$13,926.38 | \$6,963.19 |

Exhibit B

Redline

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

| | | |
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| In re: | § | Chapter 11 |
| | § | |
| SPEEDCAST INTERNATIONAL LIMITED, et al., | § | Case No. 20-32243 (MI) |
| | § | |
| Debtors.¹ | § | (Jointly Administered) |
| | § | Re: Docket No. <u>7</u> |

ORDER (I) APPROVING DEBTORS’ PROPOSED FORM OF ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES; (II) ESTABLISHING PROCEDURES FOR RESOLVING OBJECTIONS BY UTILITY COMPANIES; (III) PROHIBITING UTILITY COMPANIES FROM ALTERING, REFUSING, OR DISCONTINUING SERVICE; AND (IV) GRANTING RELATED RELIEF

Upon the motion, dated April 23, 2020 (the “**Motion**”)² of SpeedCast International Limited and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), for entry of an order pursuant to sections 366 and 105(a) of the Bankruptcy Code and Bankruptcy Rules 6003 and 6004 (i) approving Debtors’ proposed form of adequate assurance of payment to the Utility Companies, (ii) establishing procedures for resolving objections by the Utility Companies, (iii) prohibiting the Utility Companies from altering, refusing, or discontinuing service, and (iv) granting related relief, all as more fully set forth in the Motion; and upon consideration of the Healy Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §1334; and consideration of the Motion and the

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requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and this Court having held a hearing to consider the relief requested in the Motion; and all objections, if any, to the Motion have been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtors and their estates as contemplated by Bankruptcy Rule 6003 and is in the best interests of the Debtors and their respective estates and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Adequate Assurance shall constitute adequate assurance of future payment as required by section 366 of the Bankruptcy Code.
2. The Debtors shall deposit the Adequate Assurance Deposit in the amount of \$196,000 in a newly created, segregated account for the benefit of the Utility Companies within 20 days after the Petition Date.
3. All Utility Companies including, without limitation, those listed on **Exhibit 1** annexed hereto, are prohibited from altering, refusing, or discontinuing Utility Services, or otherwise discriminating against the Debtors, on account of any unpaid prepetition charges or any perceived inadequacy of the Debtors' Proposed Adequate Assurance.
4. The following Adequate Assurance Procedures are hereby approved:

- a. Within three business days after entry of ~~the Proposed~~this Order, the Debtors will fax, e-mail, serve by mail, or otherwise expeditiously send a copy of the Motion and ~~the Proposed~~this Order to the Utility Companies on the Utility Services List.
- b. ~~Subject to entry of the Proposed Order, the~~The Debtors will deposit the Adequate Assurance Deposit, in the aggregate amount of \$196,000, in the Utility Deposit Account within 20 days after the Petition Date.
- c. The funds in the Utility Deposit Account shall constitute adequate assurance for each Utility Company in the amount set forth for such Utility Company in the column labeled “Proposed Adequate Assurance” on the Utility Services List.
- d. If an amount relating to Utility Services provided postpetition by a Utility Company is unpaid, and remains unpaid beyond any applicable grace period, such Utility Company may request a disbursement from the Utility Deposit Account by giving notice to (i) proposed counsel to the Debtors, Weil, Gotshal & Manges LLP, 700 Louisiana Street, Suite 1700, Houston, TX 77002 (Attn: Brenda Funk, Esq. and Stephanie Morrison, Esq.), (ii) the Office of the United States Trustee, 515 Rusk Street, Suite 3516, Houston, TX 77002, (iii) counsel to the Ad Hoc Group of Secured Lenders, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017 (Attn: Damian S. Schaible, Esq. and David Schiff, Esq.), and (iv) counsel for any official committee of unsecured creditors appointed in these chapter 11 cases (collectively, the “**Utility Notice Parties**”). The Debtors shall honor such request within five business days after the date the request is received by the Debtors, subject to the ability of the Debtors and any such requesting Utility Company to resolve any dispute regarding such request without further order of the Court. To the extent a Utility Company receives a disbursement from the Utility Deposit Account, the Debtors will replenish the Utility Deposit Account in the amount so disbursed.
- e. The portion of the Adequate Assurance Deposit attributable to each Utility Company will be returned to the Debtors on the earlier of (i) reconciliation and payment by Debtors of the Utility Company’s final invoice in accordance with applicable nonbankruptcy law following the Debtors’ termination of Utility Services from such Utility Company and (ii) the effective date of any chapter 11 plan confirmed in these chapter 11 cases.
- f. Any Utility Company desiring additional assurances of payment in the form of deposits, prepayments, or otherwise must serve a request for additional assurance (an “**Additional Assurance Request**”) on the Utility Notice Parties.

- g. The Additional Assurance Request must (i) be made in writing, (ii) set forth the location(s) for which Utility Services are provided, the account number(s) for such location(s), and the outstanding balance for each such account, (iii) explain why the Utility Company believes the Adequate Assurance Deposit is not adequate assurance of payment, (iv) summarize the Debtors' payment history relevant to the affected account(s), (v) certify the amount that is equal to one half of monthly Utility Services provided by the Utility Company to the Debtors, calculated as a historical average over the 9-month period preceding the Petition Date, and (vi) certify that the Utility Company does not already hold a deposit equal to or greater than one half of monthly Utility Services provided by such Utility Company.
- h. An Additional Assurance Request may be made at any time. If a Utility Company does not file and serve an Additional Assurance Request, the Utility Company will be (i) deemed to have received "satisfactory" adequate assurance of payment in compliance with section 366 of the Bankruptcy Code and (ii) forbidden from discontinuing, altering, or refusing Utility Services to, or discriminating against, the Debtors on account of any unpaid prepetition charges or requiring additional assurance of payment other than the Proposed Adequate Assurance.
- i. Upon the Debtors' receipt of an Additional Assurance Request, the Debtors will negotiate with such Utility Company to resolve such Utility Company's Additional Assurance Request.
- j. The Debtors may, without further order from the Court, resolve an Additional Assurance Request by mutual agreement with a Utility Company, and the Debtors may, in connection with any such agreement, with the consent of the Required IC DIP Lenders (as defined in the DIP Order), not to be unreasonably withheld, provide a Utility Company with additional adequate assurance of payment including cash deposits, prepayments, or other forms of security if the Debtors believe that such adequate assurance is reasonable, subject to the terms of any collateral orders entered by the Court.
- k. If the Debtors and the Utility Company are not able to reach an alternative resolution within 30 days of receipt of the Additional Assurance Request, the Debtors will request a hearing before the Court at the next regularly scheduled omnibus hearing to determine the adequacy of assurances of payment with respect to a particular Utility Company (the "**Determination Hearing**") pursuant to section 366(c)(3) of the Bankruptcy Code.
- l. Pending resolution of the Determination Hearing, the Utility Company filing such Additional Assurance Request will be prohibited from altering, refusing, or discontinuing Utility Services to the Debtors on account of

unpaid charges for prepetition services or on account of any objections to the Proposed Adequate Assurance.

5. Notwithstanding anything in this Order, upon a timely motion filed and served on the Utility Notice Parties by any Utility Company, the ~~Debtors~~Court shall ~~request~~conduct a hearing ~~before the Court at the next omnibus hearing date, or such other date that the Debtors and the applicable Utility Company may agree upon, but in no event later than 30 days after the Petition Date~~on May 21, 2020 at 2:00 p.m. (prevailing Central Time) (the “Final Hearing”) to resolve any dispute between the Debtors and such Utility Company regarding the Adequate Assurance Procedures of the Proposed Adequate Assurance.

6. The Utility Companies are prohibited from requiring additional adequate assurance of payment other than pursuant to the Adequate Assurance Procedures.

7. The Adequate Assurance Deposit shall automatically, without further Court order, be available to the Debtors upon the effective date of a chapter 11 plan for the Debtors.

8. The inclusion of any entity in, as well as any omission of any entity from, the Utility Services List shall not be deemed an admission by the Debtors that such entity is, or is not, a utility within the meaning of section 366 of the Bankruptcy Code, and the Debtors reserve all rights and defenses with respect thereto.

9. The Debtors are authorized to amend the Utility Services List to the extent the Debtors terminate the services of any Utility Company or identify additional Utility Companies, with the consent of the Ad Hoc Group of Secured Lenders, not to be unreasonably withheld, ~~and~~with such amendment to be filed with the Court and served in time to allow for parties to object prior to the Final Hearing. ~~†~~This Order shall apply to any such Utility Company that is added to the Utility Services List. The Debtors shall serve a copy of this Order and the

Motion upon any Utility Company added to the Utility Services List within three (3) business days.

10. The Debtors shall increase the amount of the Adequate Assurance Deposit if an additional Utility Company is added to the Utility Services List by an amount equal to one half of monthly Utility Services provided by such additional Utility Company, calculated using the historical average for such payments during the 9 months prior to the Petition Date. ~~The~~

11. Notwithstanding paragraph 9 hereof, the Debtors may terminate the services of any Utility Company ~~and~~ at any time and, following the deposit of the Adequate Assurance Deposit in the Utility Deposit Account, are immediately authorized to reduce the Adequate Assurance Deposit by the amount held on account of such terminated Utility Company provided there are no outstanding disputes related to postpetition payments due.

12. ~~11.~~ The relief granted herein is for all Utility Companies providing Utility Services to the Debtors and is not limited to those parties or entities listed on the Utility Services List.

13. ~~12.~~ Notwithstanding anything to the contrary herein, any payment to be made by the Debtors pursuant to the authority granted herein shall be subject to and in compliance with any orders entered by the Court approving the Debtors' (1) entry into any postpetition debtor in possession financing facility, including any budget and the terms of any definitive documentation in connection therewith (the "**DIP Documents**"), and/or (2) authorizing the Debtor's use of cash collateral and/or any budget in connection therewith (in either case, the "**DIP Order**"). To the extent there is any inconsistency between the terms of the DIP Order or any DIP Documents, on the one hand, and any action taken or proposed to be taken

hereunder, on the other hand, the terms of the DIP Order or such DIP Document, as applicable, shall control.

14. ~~13.~~ Nothing contained in the Motion or this Order or any payment made pursuant to the authority granted by this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

15. ~~14.~~ The requirements of Bankruptcy Rule 6003(b) have been satisfied.

16. ~~15.~~ Notice of the Motion is adequate under Bankruptcy Rule 6004(a).

17. ~~16.~~ Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

18. ~~17.~~ The Debtors are authorized to take all reasonable actions necessary or appropriate to carry out the relief granted in this Order.

19. ~~18.~~ This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2020
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Utility Services List

Utility Services List

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---------------------------------|--|--------------------------------|-------------------------|-----------------------------|
| Florida Power & Light Company | 700 Universe Blvd Juno Beach, FL 33408 | Electricity | \$12,751.03 | \$6,375.52 |
| Sun Coast Resources, Inc. | PO Box 202603 Dallas, TX 75320 | Fuel | \$458.06 | \$229.03 |
| Waste Management Inc Of Florida | PO Box 4648 Carol Stream, IL 60197 | Waste Disposal | \$107.82 | \$53.91 |
| BFI Waste Services of Texas, LP | 18500 N. Allied Way Dallas, TX 75284-1833 | Waste Disposal | \$1,862.04 | \$931.02 |
| River Parish Disposal, LLC | PO Box 10482 New Orleans, LA 70181 | Waste Disposal | \$231.64 | \$115.82 |
| Entergy Corporation | PO Box 8108 Baton Rouge, LA 70891-8108 | Electricity | \$1,559.38 | \$779.69 |
| Direct Energy | PO Box 70220 Philadelphia, PA 19176 | Electricity | \$14,108.49 | \$7,054.25 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---|--|---------------------------------------|--------------------------------|------------------------------------|
| City of Houston Water | PO Box 1560 Houston, TX 77251 | Water | \$1,169.23 | \$584.61 |
| Amerigas Propane, Inc. | PO Box 105018 Atlanta, GA 30348-5018 | Fuel | \$137.32 | \$68.66 |
| SSE Business Energy | Robert Brown House Basingstoke RG21 8GZ Great Britain | Electricity | \$311.86 | \$155.93 |
| Scottish Hydro Electric | Grampian House Perth ND PH1 3GH Great Britain | Electricity | \$1,473.07 | \$736.54 |
| Clear Business | Longley House, Longley Lane Manchester M22 4SY Great Britain | Water | \$27.59 | \$13.79 |
| Hudson Energy Supply UK | 219-225 Avebury Boulevard Milton Keynes MK9 1AU Great Britain | Electricity | \$89,611.16 | \$44,805.58 |
| Aberdeen Electrical Services Limited | Unit 6 109 Urquhart Road Aberdeen AB24 5NH Great Britain | Electricity | \$8,737.23 | \$4,368.62 |
| Anglian Water Business (National) Ltd | PO Box 259 Rotherham S98 1QU Great Britain | Water | \$3,251.07 | \$1,625.53 |
| Scottish Fuels | Tryst House Glenbervie Business Park Larbert, FK5 4RB Great Britain | Fuel | \$4,768.37 | \$2,384.18 |
| Franzefoss | AVD 19 - FORUS | Waste Disposal | \$345.55 | \$172.77 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|------------------------------------|---|---------------------------------------|--------------------------------|------------------------------------|
| Gjenvinning AS | Postboks 53, 1309 RUD Norway | | | |
| Simply Energy | Level 33 Rialto South Tower Melbourne, 3000 Australia | Electricity | \$20,837.60 | \$10,418.80 |
| Taylor Marine | 62 Sparks Road Perth, WA 6166 Australia | Electricity | \$8,953.44 | \$4,476.72 |
| Water Corporation | PO Box 100 Leederville, WA 6902 Australia | Water | \$37.89 | \$18.95 |
| AGL South Australia Pty Ltd | GPO Box 77 Adelaide, 5001 Australia | Electricity | \$746.60 | \$373.30 |
| Synergy | GPO Box U1913 Perth, WA 6845 Australia | Electricity | \$14,908.14 | \$7,454.07 |
| Laser Electrical Magill | 1 Venum Street, Magill, 5072 Australia | Electricity | \$1,110.65 | \$555.32 |
| WA Refuelling | 28 Felspar St Welshpool, WA 6104 Australia | Fuel | \$141.94 | \$70.97 |
| South Australian Water Corporation | GPO Box 1751 Adelaide, SA 5001 Australia | Water | \$175.54 | \$87.77 |
| Jacana Energy | GPO Box 2601, Darwin , NT 0801 Australia | Electricity | \$232.32 | \$116.16 |
| EnergyAustralia | Locked Bag W100 Sydney, FL 1291 Australia | Electricity | \$1,049.01 | \$524.51 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|-------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| Origin Energy Ltd | GPO Box 1199 Adelaide, 5001 Australia | Electricity | \$2,220.26 | \$1,110.13 |
| The Hongkong Electric Company | Hongkong Electric Centre, 44 Kennedy Road, Hong Kong | Electricity | \$455.26 | \$227.63 |
| Shell Hong Kong Limited | 35/F, AIA Kowloon Tower, Landmark East, 100 How ming street ,Kwun Tong Kowloon, Hong Kong | Fuel | \$819.53 | \$409.76 |
| E-ON Energy Ltd | Newland House 49 Mount Street Nottingham, NG1 6PG Great Britain | Electricity & Gas | \$3,454.49 | \$1,727.25 |
| SSE Business Energy | No. 1 Forbury Place 43 Forbury Road Reading, RG1 3JH Great Britain | Electricity & Gas | \$157.32 | \$78.66 |
| ENGIE Energie Nederland N.V. | Grote Voort 291 Zwolle, BL 8041 Netherlands | Electricity | \$8,327.82 | \$4,163.91 |
| REMONDIS Nederland B.V. | Dieselstraat 7 Lichtenvoorde, 7131 PC Netherlands | Waste Disposal | \$504.78 | \$252.39 |
| Kenter B.V. | Dijkgraaf 2 Netherlands, Duiven 6921 RL Netherlands | Electricity | \$103.92 | \$51.96 |
| Handy Clean B.V. | Merwede 6 Lelystad, 8226 NA Netherlands | Waste Disposal | \$1,314.33 | \$657.16 |
| Esso Vermeulen & ZN B.V. | Europa-Allee 4 Installatieweg 7 Kampen, 8265 VB Netherlands | Fuel | \$144.17 | \$72.09 |
| LIANDER N.V. | Postbus 50 Duiven, 6920 AB | Electricity | \$3,724.56 | \$1,862.28 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| | Netherlands | | | |
| Vitens N.V. | Oude Veerweg 1 Zwolle, 8019 BE Netherlands | Water | \$71.00 | \$35.50 |
| ACA Waste Services Inc | 40 Eads St West Babylon, NY 11704 | Waste Disposal | \$193.58 | \$96.79 |
| PSEG Long Island | 1650 Islip Ave Brentwood, NY 11717 | Electricity | \$129,033.19 | \$64,516.59 |
| National Grid plc | Po Box 11791 Newark, NJ 07101-4791 | Gas | \$4,723.99 | \$2,362.00 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|--------------------------------------|---|---------------------------------------|--------------------------------|------------------------------------|
| National Waste Services, LLC | 1863 Harrison Avenue Bay Shore, NY 11706 | Waste Disposal | \$2,343.88 | \$1,171.94 |
| Suffolk County Water Authority: SCWA | PO Box 9044 Hicksville, NY 11802 | Water | \$224.25 | \$112.12 |
| Paraco Gas Corporation | P.O. BOX 412227 Boston, MA 02241-2227 | Gas | \$56.95 | \$28.48 |
| Tuas Power Supply Pte Ltd | 111 Somerset Rd, #11-09 Singapore 238164 | Electricity | \$57.60 | \$28.80 |
| Summit Electric Supply Co. Inc. | PO Box 848345 Dallas, TX 75284-8345 | Electricity | \$558.80 | \$279.40 |
| Stark Software International Ltd | Sentinel House, 10-12 Massetts Road Horley, Surrey RH6 7DE Great Britain | Gas | \$93.07 | \$46.53 |
| Kleenheat Gas Pty Ltd | PO Box 4184 Myaree Business Centre WA 6960 Australia | Gas | \$41.55 | \$20.78 |
| Arrow Electrical Services Pty. Ltd. | PO Box 25 South Fremantle, 6162 Netherlands | Electrical Services | \$727.67 | \$363.83 |
| WINconnect Pty Ltd | PO Box 217 Hawthorn, VIC 3122 Australia | Electrical Services | \$71.42 | \$35.71 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| South East Water Corporation | 101 Wells Street Frankston, VIC 3199 Australia | Water | \$9.88 | \$4.94 |
| Enpron | Lavendelheide 7A Drachten, 9202 PD Netherlands | Electricity | \$145.76 | \$72.88 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|--------------------------------------|---|---------------------------------------|--------------------------------|------------------------------------|
| Van Werven Holding B.V. | Postbus 14 Oldebroek, 8096 ZG Netherlands | Waste Disposal | \$40.02 | \$20.01 |
| Con Ed / Constellation | 100 Summit Lake Drive Suite 410 Valhalla, NY 10595-1356 | Electricity | \$11,350.82 | \$5,675.41 |
| Baltimore Gas and Electric Company | P.O. Box 13070 Philadelphia, PA 19101-3070 | Electricity | \$1,991.22 | \$995.61 |
| Danisi Energy Company Inc. | 3205 Route 112 Medford, NY 11763 | Fuel | \$516.70 | \$258.35 |
| Waste Management of Virginia | PO Box 13648 Philadelphia, PA 19101-3648 | Waste Disposal | \$0 | \$0 |
| City Wide Sewer & Drain Service Corp | PO Box 350 Carle Place, NY 11514-0350 | Septic/Sewage | \$376.57 | \$188.28 |
| AAA Action Septic Service LLC | 166 Campbell Acres Road Cleveland, TX 77328 USA | Septic/Sewage | \$133.33 | \$66.67 |
| Waste Management Inc. of Florida | PO Box 4648 Juno Beach, IL 60197-4648 | Waste Disposal | \$300.92 | \$150.46 |
| Joulz Meetbedrijf B.V. | Blaak 8 Rotterdam, 3011TA Netherlands | Electricity | \$103.92 | \$51.96 |

| Company | Address(s) | Description of Utility Service | Average Monthly Expense | Proposed Adequate Assurance |
|---------------------------------------|--|---------------------------------------|--------------------------------|------------------------------------|
| Waste Connections of Florida | 3840 NW 37th Ct Miami, FL 33142 | Waste Disposal | \$286.99 | \$143.49 |
| City of North Miami | 17011 NE 19 Ave North Miami Beach, FL 33162 | Water | \$103.34 | \$51.67 |
| Dubai Electricity and Water Authority | P.O. Box 564 Dubai U.A.E. | Electricity & Water | \$101.89 | \$50.94 |
| EYDAP | 12 Satovriandou str. Athens, 10432 Greece | Water | \$60.60 | \$6.73 |
| SSE Enterprise Telecoms Ltd. | One Forbury Place, 4th Floor Reading RG1 3JH Great Britain | Telecommunications | \$4,639.55 | \$2,319.78 |
| Lyse AS | PO Box 8124 Stavanger, 4069 Norway | Electricity | \$4,934.04 | \$2,467.02 |
| Électricité de France S.A. | TSA 20121 CEDEX 20 LYON, 69937 France | Electricity | \$856.89 | \$428.45 |
| Broadview Networks | PO Box 9242 Uniondale, NY 11555-9242 | Telecommunications | \$3,681.06 | \$1,840.53 |
| Verizon Wireless | Kim Robertson-Corporate Finance P.O. Box 4830 Trenton, NJ 08650-4830 | Telecommunications | \$13,926.38 | \$6,963.19 |