

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

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

OBJECTION TO DEBTORS’ PROPOSED CURE AMOUNT

Scorpion Rigs Ltd (“Scorpion”), Seadrill Abu Dhabi Operations Limited (“Seadrill Abu Dhabi”), Seadrill Angola LDA (“Seadrill Angola”), Seadrill Canada Ltd (“Seadrill Canada”), Seadrill Deepwater Drillship Ltd. (“Seadrill Deepwater”), Seadrill Eclipse Ltd (“Seadrill Eclipse”), Seadrill Gulf Operations Auriga LLC (“Seadrill Auriga”), Seadrill Gulf Operations Sirius LLC (“Seadrill Sirius”), Seadrill Leo Ltd. (“Seadrill Leo”), Seadrill Management Limited (“Seadrill Management”), Seadrill Newfoundland Operations Ltd (“Seadrill Newfoundland”), Seadrill Saturn Ltd. (“Seadrill Saturn”), Seadrill UK Operations Ltd (“Seadrill UK”), and Sevan Driller Ltd (“Sevan”) (collectively, the “Seadrill Entities”) file this Limited Objection regarding the *Notice of Intent to Assume and Cure Amounts with Respect to Executory Contracts and Unexpired Leases of Debtors* [Doc. 958] (the “Assumption Notice”) and respectfully show the Court as follows:

1. The Seadrill Entities object to the Assumption Notice insofar as it proposes not to pay any cure amounts to the Seadrill Entities. The Seadrill Entities have a continuing and ongoing vendor relationship with many of the Debtors under the same Master Services Agreement that

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



existed prepetition, and the Seadrill Entities object to the Debtors' assumption of their contracts without any cure payment.

2. Since 2015, the Seadrill Entities have engaged in business with the Debtors, including CapRock UK Limited ("CapRock UK") and SpeedCast Norway AS ("SpeedCast Norway") pursuant to a Master Services Agreement (the "MSA") and related purchase orders. There was a dispute between the Seadrill Entities and certain of the Debtors regarding overcharges to the Seadrill Entities under the MSA.

3. On November 16, 2020, the Debtors filed the Assumption Notice, seeking to assume certain contracts with the Seadrill Entities without designating a cure amount. The Seadrill Entities and the Debtors are in the process of reconciliation with respect to the exact cure amount; therefore, the Seadrill Entities are filing this objection out of an abundance of caution.

WHEREFORE, the Seadrill Entities pray that the Court sustain this Objection and grant the Seadrill Entities such other and further relief to which they are justly entitled.

Dated: December 10, 2020

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**ATTORNEYS FOR THE SEADRILL
ENTITIES**

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2020, a true and correct copy of the foregoing was served upon all counsel of record and parties requesting service via the Court's CM/ECF system.

/s/ Victoria Argeroplos
Victoria Argeroplos