

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)
	§	
Reorganized Debtors. ¹	§	(Jointly Administered)
	§	

**MOTION OF SPEEDCAST INTERNATIONAL LIMITED
AND SPEEDCAST GROUP HOLDINGS PTY LTD FOR ENTRY OF
FINAL DECREE AND ORDER CLOSING THE REMAINING CHAPTER 11 CASES**

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/](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.

SpeedCast International Limited and SpeedCast Group Holdings Pty Ltd (together, the “**Remaining Debtors**”) and collectively with their debtor affiliates, the “**Debtors**” and, as reorganized, the “**Reorganized Debtors**”)² respectfully represent the matters set forth below in support of this motion (the “**Motion**”):

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

² Capitalized terms undefined but referenced herein shall have the meanings ascribed to them in the Plan (as defined herein).



Relief Requested

1. Pursuant to section 350(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), and Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Remaining Debtors seek entry of a final decree and order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Final Decree and Order**”), closing the chapter 11 cases of Speedcast International Limited (Case No. 20-32243) and SpeedCast Group Holdings Pty Ltd (Case No. 20-32249).

Jurisdiction

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

A. General Background

3. On April 23, 2020 (the “**Petition Date**”), each of the Debtors commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code. The Debtors operated their businesses and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. During their pendency, the Debtors’ chapter 11 cases were jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

4. On April 21, 2024, the Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Docket No. 1924) (the “**Initial Final Decree**”), which closed the chapter 11 cases of all of the Reorganized Debtors, except for the Remaining Debtors.

B. Confirmation of Plan and Occurrence of Plan Effective Date

5. On January 21, 2021 the Debtors filed the *Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates* (Docket No. 1394) (the “**Plan**”).

6. On January 22, 2021, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosure Statement on a Final Basis, (II) Confirming Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates, (III) Approving Plan Settlement Agreement, and (IV) Granting Related Relief* (Docket No. 1397) (the “**Confirmation Order**”). Pursuant to paragraph 44 of the Confirmation Order, the Confirmation Order is a final order, and the period in which an appeal must have been filed commenced upon entry of the Confirmation Order. No appeal was timely filed.

7. On March 11, 2021 (the “**Effective Date**”), all conditions to effectiveness of the Plan occurred and the Plan became effective, and the Debtors emerged from bankruptcy as the Reorganized Debtors. *See Notice of (I) Entry of Order Approving Disclosure Statement on a Final Basis and Confirming Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates and (II) Occurrence of Effective Date* (Docket No. 1498).

8. As contemplated and required by the Plan and the Confirmation Order, all documents and agreements necessary to implement the Plan were executed in accordance with the terms of the Plan and the Confirmation Order.

9. As of the date hereof, the Plan has been substantially consummated, and all professional fees have been paid in accordance with section 2.2 of the Plan.

10. All expenses arising from the administration of the Reorganized Debtors’ estates and chapter 11 cases, including court fees and fees arising under 28 U.S.C. § 1930(a)(6) (the “**Section 1930 Fees**”), have been paid or will be paid in accordance with section 12.5 of the

Plan. The total quarterly U.S. Trustee required to be paid by the Remaining Debtors for the second quarter of 2025 will be paid when due.

C. Plan Has Been Substantially Consummated

11. The Plan became effective as of March 11, 2021, and all transactions and distributions required to be made under the Plan have been made or will be made in accordance with the terms thereof, including:

- a) The transfer of assets under the Plan, including the issuance and delivery of the New Equity Interests to the Plan Sponsor (as defined in the Plan);
- b) The creation of the Litigation Trust and the transfer of all Litigation Trust Causes of Action (as defined in the Plan) to the Litigation Trust. Further, following entry of the Initial Final Decree, the Litigation Trust Stipulation (as defined herein) was entered, dismissing the Litigation Trust Proceeding (as defined herein) with prejudice;
- c) The creation of the Class 3 Trust and the transfer of the Class 3 Trust Causes of Action (as defined in the Plan) to the Class 3 Trust. Further, since the entry of the Initial Final Decree, the Shaper Proceeding (as defined herein) was settled as between the parties thereto;
- d) All distributions to holders of Allowed Claims in Class 1 (Other Priority Claims), Class 2 (Other Secured Claims) and Class 3 (Syndicated Facility Secured Claims) have been made;
- e) All distributions to holders of Allowed Claims in Class 4A (Unsecured Trade Claims) have been made;
- f) The necessary Corporate Restructuring Steps (as defined in the Plan) have been undertaken;
- g) All other court proceedings have been resolved (as discussed below).

12. The Reorganized Debtors understand that distributions are to be made by in the near term by the Litigation Trustee to the beneficiaries of the Litigation Trust. Closing the cases of the Remaining Debtors will not impact the distributions by the Litigation Trustee to the beneficiaries of the Litigation Trust. The Reorganized Debtors understand that there are no

distributions to be made by the Class 3 Trustee to the beneficiaries of the Class 3 Trust. In addition, the relief sought in this Motion is without prejudice to the rights of the Class 3 Trustee or the Litigation Trustee to seek to reopen any of the Debtors' chapter 11 cases.

D. All Outstanding Claims Have Been Resolved

13. All claims of creditors in the chapter 11 cases have been resolved consistent with the relevant provisions of the Plan via (a) mutual resolution with claimants or (b) the eleven omnibus objections to claims (Docket Nos. 1723, 1726, 1768, 1770, 1790, 1791, 1792, 1797, 1804, 1806 and 1809). The Court has entered eleven orders sustaining the Reorganized Debtors' omnibus claims objections.

E. Court Proceedings Have Been Resolved

14. *The Shaper Proceeding Settled.* The Class 3 Trustee brought an action against Mr. Peter Shaper on January 7, 2022 by filing an Original Petition in the District Court of Harris County, Texas, 61st Judicial District (the "**Shaper Proceeding**"). Mr. Shaper filed the *Adversary Case 22-03019, Notice of Removal* (Docket No. 1899) to remove the Shaper Proceeding to the Bankruptcy Court. On September 15, 2022, the Court entered an order remanding the Shaper Proceeding to the District Court of Harris County, Texas (Docket No. 2026). The Shaper Proceeding has since settled as between the parties (*see Joint Notice of Nonsuit with Prejudice, Youngman v. Shaper, No. 2022-01305 (Tex. Dist. Ct. Harris Cnty. Jan. 10, 2025)*).

15. *The Litigation Trust Proceeding Was Dismissed by Stipulation.* The Litigation Trustee brought an action against Pierre-Jean Joseph Andre Beylier on April 23, 2024 by filing a Complaint with the Court (Adv. Pro. No. 24-03092) (Docket No. 2060) (the "**Litigation Trust Proceeding**"). On December 16, 2024, the parties to the Litigation Trust Proceeding filed

the *Joint Stipulation of Dismissal With Prejudice* (Docket No. 2072) whereby the Litigation Trust Proceeding was dismissed with prejudice pursuant to Rule 7041 of the Federal Rules of Bankruptcy Procedure and Rule 41 of the Federal Rules of Civil Procedure (the “**Litigation Trust Stipulation**”).

16. ***Inmarsat Administrative Expense Claim.*** On December 21, 2021, the Court issued a memorandum opinion and order (Docket Nos. 1798 and 1799) denying *Inmarsat Global Limited, Inmarsat Solutions B.V., Inmarsat Maritime Ventures Ltd., Inmarsat Inc., Inmarsat Solutions (US) Inc., Inmarsat Solutions (Canada) Inc., and Inmarsat Solutions AS Norway’s Application for Allowance of Administrative Expense Claim* (Docket No. 1532) (the “**Inmarsat Application**”). On December 31, 2021, Inmarsat³ filed the *Notice of Appeal of the Bankruptcy Court’s Order Denying the Administrative Expense Claim* (Docket No. 1813), appealing the Court’s decision. The district court affirmed the Court’s ruling and, on August 3, 2023, the Court of Appeals for the Fifth Circuit affirmed this Court’s and the district court’s decisions, finalizing the denial of Inmarsat’s Administrative Expense Claim (*see Inmarsat Global Ltd. v. Speedcast Int’l Ltd.*, 76 F. 4th 372 (5th Cir. 2023)).

Basis for Relief

17. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11 reorganization

³ Inmarsat Global Limited, Inmarsat Solutions B.V., Inmarsat Maritime Ventures Ltd., Inmarsat Inc., Inmarsat Solutions (US) Inc., Inmarsat Solutions (Canada) Inc., and Inmarsat Solutions as Norway (collectively, “**Inmarsat**”).

case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

18. The term “fully administered” is not defined by either the Bankruptcy Code or the Bankruptcy Rules. The Advisory Committee Note to Bankruptcy Rule 3022, however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a) whether the order confirming the plan has become final;
- b) whether deposits required by the plan have been distributed;
- c) whether the property proposed by the plan to be transferred has been transferred;
- d) whether the debtor or its successor has assumed the business or the management of the property dealt with by the plan;
- e) whether payments under the plan have commenced; and
- f) whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991).

19. Courts have generally used the six factors listed in the Advisory Committee Note to determine whether a case has been fully administered. *See, e.g., In re Clayton*, 1996 WL 661099, summary op. at *1–2 (5th Cir. 1996) (“Although rule 3022 does not define ‘fully administered,’ the Advisory Committee Notes provide some guidance, listing various factors a court should consider in determining whether an estate has been fully administered”); *In re JCP Props., Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015) (analyzing Advisory Committee Notes); *In re Valence Tech., Inc.*, Ch. 11 Case No. 12-11580-CAG, 2014 WL 5320632, at *3 (Bankr. W.D. Tex. Oct. 17, 2014); *In re Gould*, 437 B.R. 34, 37 (Bankr. D. Ct. 2010); *In re Jay Bee Enter., Inc.*, 207 B.R. 536, 538 (Bankr. E.D. Ky. 1997). The six factors merely serve as a guide, however, and

each of the factors need not be present before a court enters a final decree. *See Mold Makers*, 124 B.R. 766, 768 (Bank. N.D. Ill. 1990) (“[A]ll of the factors in the Committee Note need not be present before the Court will enter a final decree”); *see Walnut Associates v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994); *Ericson v. IDC Servs., Inc. (In re IDC Servs., Inc.)*, Ch. 11 Case No. 93 B 45922 (SMB), 1998 WL 547085, at *3 (S.D.N.Y. Aug. 28, 1998) (“[T]he approach that looks to the Advisory Note provides a more complete and flexible standard for determining when to close a chapter 11 case, and is therefore preferable.”); *see also In re Clayton* 101 F. 3d 697 (5th Cir. 1996) (“[t]hese factors merely serve as a guide, however, and each need not be present before the entry of a final decree.”).

20. In addition to the factors set forth in the Advisory Committee Note, courts have considered whether the plan has been substantially consummated. *See, e.g., JCP Props*, 540 B.R. at 605 (“[S]ubstantial consummation is the pivotal question here to determine the propriety of closing the [debtor’s] case by Final Decree.”); *In re Gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case); *Walnut Assocs.*, 164 B.R. at 493 (same). Section 1101(2) of the Bankruptcy Code defines “substantial consummation” as “(a) transfer of all or substantially all of the property proposed by the plan to be transferred; (b) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (c) commencement of distribution under the plan.” 11 U.S.C. § 1101(2).

21. Courts have previously entered final decrees notwithstanding remaining future payments contemplated under a chapter 11 plan. *See, e.g., In re Gen. Dev. Corp.*, 180 B.R. 303, 306 (Bankr. S.D. Fla. 1995) (the fact that there might be further redistribution of stock and

notes by reorganized debtor as well as continuing payments of cash to certain creditors did not prevent bankruptcy court from entering final decree closing consolidated Chapter 11 cases based on substantial consummation of chapter 11 plan); *In re Johnson*, 402 B.R. 851, 856 (Bankr. N.D. Ind. 2009) (“Although the debtor has not completed the plan payments, that does not prevent a case from being fully administered.”); *In re Mendez*, 464 B.R. 63, 65 (Bankr. D. Mass. 2011) (finding that an individual chapter 11 case need not remain open during the entire post-confirmation period only because a discharge had not been entered and plan payments had not been completed). Indeed, the Advisory Committee Notes to Bankruptcy Rule 3022 expressly provide that “entry of a final decree closing a chapter 11 case should not be delayed solely because the payments required by the plan have not been completed.” Fed. R. Bankr. P. 3022, Advisory Comm. Note.

Chapter 11 Cases of the Remaining Debtors Have Been Fully Administered

22. The Remaining Debtors have been “fully administered” within the meaning of section 350 of the Bankruptcy Code, making it appropriate for the Court to enter a final decree closing these cases. The Confirmation Order was entered on January 22, 2021, and the Plan has been substantially consummated. Among other things:

- a) the Confirmation Order has become final and is non-appealable and the Plan went effective on March 11, 2021;
- b) all payments required to be made pursuant to the Plan have been paid or will be paid;
- c) there are no open contested matters or adversary proceedings that require the Remaining Debtors’ cases to remain open;
- d) the Shaper Proceeding was settled as between the relevant parties thereto;
- e) the Litigation Trust Stipulation was entered, dismissing the Litigation Trust Proceeding with prejudice;

f) substantially all distributions provided for under the Plan have been made and any remaining distributions will be made in accordance with the terms of the Plan; and

g) all of the transactions contemplated by the Plan have closed.

23. The foregoing factors support closing the cases of the Remaining Debtors.

24. To the extent necessary, the Court will retain jurisdiction and authority over any issues relating to the Remaining Debtors.

25. All fees under 28 U.S.C. § 1930(a)(6) (“**Section 1930 Fees**”) that are due and owing in these chapter 11 cases have been paid or will be paid in the ordinary course. Any further Section 1930 Fees that may arise in the Remaining Debtors’ chapter 11 cases will be paid as and when such fees come due. As such, closing the Remaining Debtors’ chapter 11 cases complies with Bankruptcy Rule 3022.

26. Closing the cases of the Remaining Debtors will relieve the Court, the Office of the United States Trustee for the Southern District of Texas, and the Remaining Debtors from each of their administrative burdens with respect to the chapter 11 cases of the Remaining Debtors “The court should not keep [a] case open only because of the possibility that the court’s jurisdiction may be invoked in the future.” Fed. R. Bankr. P. 3022, Advisory Comm. Notes (1991). Furthermore, any party in interest may petition the Bankruptcy Court to reopen any of the Debtors’ chapter 11 cases pursuant to section 350(b) of the Bankruptcy Code, despite the entry of the final decree closing those cases. *See* Fed. R. Bankr. P. 5010. Accordingly, entry of a final decree closing the chapter 11 cases of the Remaining Debtors is warranted.

WHEREFORE the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as it deems just and proper.

Dated: June 6, 2025
Houston, Texas

Respectfully submitted,

/s/ Stephanie N. Morrison
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Attorneys for Reorganized Debtors

Certificate of Service

I hereby certify that, on June 6, 2025, 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.

/s/ Stephanie N. Morrison

Stephanie N. Morrison

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

In re: SPEEDCAST INTERNATIONAL LIMITED, et al., Reorganized Debtors.¹	§ § § § § § § §	Chapter 11 Case No. 20-32243 (MI) (Jointly Administered) (Re: Docket No.)
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FINAL DECREE AND ORDER CLOSING THE REMAINING CHAPTER 11 CASES

Upon *Motion for Entry of Final Decree and Order Closing the Remaining Chapter 11 Cases*, dated June 6, 2025 (the “**Motion**”), of SpeedCast International Limited and SpeedCast Group Holdings Pty Ltd (together the “**Remaining Debtors**,” and collectively with their debtor affiliates, the “**Debtors**,” and as reorganized, “**Reorganized Debtors**”), pursuant to section 350(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of a final decree and order (this “**Final Decree and Order**”) closing the chapter 11 cases of Speedcast International Limited (Case No. 20-32243) and SpeedCast Group Holdings Pty Ltd (Case No. 20-32249), all as more fully set forth in the Motion;² and the Court having jurisdiction to consider the Motion and grant the requested relief in accordance with 28 U.S.C. § 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that the Remaining Debtors have provided due and proper notice of the Motion and no further notice is necessary; and the Court

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

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

having determined that the legal and factual bases set forth in the Motion establish just and sufficient cause to grant the requested relief,

IT IS HEREBY ORDERED THAT:

1. Pursuant to section 350(a) of the Bankruptcy Code and Rule 3022 of the Bankruptcy Rules, the chapter 11 cases of the Remaining Debtors are hereby closed as of the date of this Final Decree and Order.

2. A docket entry shall be made in each of the Remaining Debtors' cases reflecting entry of this Final Decree and Order.

3. Entry of this Final Decree and Order is without prejudice to (i) the rights of any Reorganized Debtor or other party in interest to seek to reopen any of the Reorganized Debtors' chapter 11 cases for cause pursuant to section 350(b) of the Bankruptcy Code and (ii) the rights of the Reorganized Debtors or any other party in interest to dispute, object to, or resolve any Claim that was filed by or against any of the Debtors or Reorganized Debtors in their chapter 11 cases. Except as expressly set forth in the Bankruptcy Code, nothing in this Final Decree and Order shall affect the substantive rights of any party in interest in the Reorganized Debtors' chapter 11 cases.

4. Notwithstanding entry of this Final Decree and Order, the Remaining Debtors shall file post-confirmation reports for the period from April 1, 2025, to the date this Final Decree and Order is entered by the later of thirty (30) days after entry of this Final Decree and Order, and (ii) the date on which such post-confirmation quarterly report is otherwise due.

5. The Remaining Debtors shall pay any outstanding quarterly fees when due and payable under 28 U.S.C. § 1930(a)(6)(A) and (B) by either (1) remitting payment to the United States Trustee Payment Center, PO Box 6200-19, Portland, or 97228-6200, which payment shall

reflect the Remaining Debtors' account numbers and shall be transmitted with a "Chapter 11 Quarterly Fee Payment" coupon available from the United States Trustee; or (2) by remitting payment via the pay.gov website: <http://www.pay.gov/public/form/start/672415208>, using the ten digit case number for each payment, no later than the later of (x) forty-five (45) days after the date of entry of the Final Decree and Order and (y) the date on which such quarterly fees are otherwise due. The Remaining Debtors shall furnish evidence of such payment to the United States Trustee by email to Brian R. Henault (USTP) (Brian.R.Henault@usdoj.gov). This Court retains jurisdiction to enforce payment of fees assessed under 28 U.S.C. § 1930(a)(6)(A) and (B).

6. All expenses arising from the administration of the Remaining Debtors' estates and these chapter 11 cases, including, without limitation, Section 1930 Fees, have been paid or will be paid as and when such expenses come due.

7. This Court retains jurisdiction over the Remaining Debtors' chapter 11 cases, including in all matters related to the enforcement of the Plan and Confirmation Order and any other Order entered by this Court in the chapter 11 cases, and all matters arising from or related to the implementation, interpretation, or enforcement of this Final Decree and Order.

8. Following the completion of the services identified in paragraphs 9 and 10 below, the Reorganized Debtors claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global ("**Verita**"), shall have no further obligations to this Court or any party in interest with respect to the claims, noticing, and solicitation services in these chapter 11 cases.

9. Within thirty (30) days following entry of this Final Decree and Order, Verita shall deliver to the Clerk an electronic copy in pdf format of all proofs of claim filed in the Reorganized Debtors' chapter 11 cases. Once the electronic copy has been received by the Clerk,

Verita may destroy all proofs of claim in its possession sixty days after filing a Notice of Intent to Destroy on the Court's docket.

10. Verita will collect and forward any mail regarding the Reorganized Debtors' chapter 11 cases after entry of this Final Decree and Order mail as soon as reasonably practicable to the Debtors, provided that the Debtors shall provide Verita with reasonable compensation and reimburse Verita for its reasonable and documented expenses in connection with any such mail forwarding services provided by Verita to the Debtors after the date of entry of this Final Decree and Order.

11. Notwithstanding anything to the contrary, the terms and conditions of this Final Decree and Order shall be immediately effective and enforceable upon its entry.

12. Entry of this Final Decree and Order is without prejudice to the rights of the Reorganized Debtors to seek entry of an order modifying or supplementing the relief granted herein.

13. The Reorganized Debtors and their agents are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree and Order.

Dated: _____, 2025

Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE