

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

In re: § Chapter 11
Seahawk Drilling, Inc., et al., § Case No.: 11-20089-RSS
Debtors. § Jointly Administered

**DEBTORS’ OBJECTION SEEKING DISALLOWANCE OF THE PROOFS OF CLAIM
FILED BY ARKANSAS AUDITOR OF STATE (CLAIM NOS. 465, 466, 467, 468, 469,
470, 471 AND 472)**

NOTICE UNDER LBR 3007-1(c)

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 21 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 21 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED.

A HEARING HAS BEEN SET ON THIS MATTER ON SEPTEMBER 27, 2011, AT 10:00 A.M., AT THE UNITED STATES BANKRUPTCY COURT, 1133 NORTH SHORELINE, 2ND FLOOR, CORPUS CHRISTI, TEXAS 78401.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Seahawk Drilling, Inc. (“**Seahawk**” or the “**Company**”) and its above-captioned affiliated debtors¹ (collectively, the “**Debtors**”) respectfully file this *Objection Seeking*

¹ The debtor-subsidaries of Seahawk are: Seahawk Drilling LLC, Energy Supply International LLC, Seahawk Global Holdings LLC, Seahawk Mexico Holdings LLC, Seahawk Drilling Management LLC, Seahawk Offshore Management LLC and Seahawk Drilling USA LLC. The subsidiaries of Seahawk that are incorporated in Mexico or have branches in Mexico are not a part of this chapter 11 proceeding.



Disallowance of the Proofs of Claim Filed by Arkansas Auditor of State (the “**Objection**”), and in support thereof state as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of these chapter 11 cases is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

2. On February 11, 2011 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”). By order dated February 14, 2011, the Court granted joint administration of these chapter 11 cases. *See* Dkt. No. 38.

3. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these cases.

4. On February 14, 2011, the Court entered an order approving the retention of Kurtzman Carson Consultants LLC (“**KCC**”) as, *inter alia*, the Debtors’ Claims Agent and Noticing Agent. *See* Dkt. No. 41.

5. Beginning on February 19, 2011, the Debtors filed their Statement of Financial Affairs and Schedules of Assets and Liabilities (collectively, the “**Schedules**”), some of which have been amended from time to time.

6. On March 8, 2011, the Court entered its *Order Pursuant to Bankruptcy Code Sections 105 and 502 and Bankruptcy Rules 2002, 3003(c)(3), and 9007 (I) Setting General Bar Date and Procedures for Filing Proofs of Claim; and (II) Approving Form and Manner of Notice*

Thereof (the “**Bar Date Order**”), wherein the Court set April 22, 2011, as the deadline for non-governmental entities to file proofs of claim (the “**Bar Date**”). *See* Dkt. No. 227.

7. Beginning on or before March 10, 2011, KCC served a copy of the Notice of Deadline for Filing Proofs of Claim (the “**Bar Date Notice**”) and the Bar Date Order on all parties listed on the Debtors’ Master Service List. *See* Dkt. Nos. 298, 299, and 371. In addition, KCC published the Bar Date Notice in the following publications: (i) the *Houston Chronicle*, (ii) *The Courier*, (iii) *The Techne News*, and (iv) *The Wall Street Journal*. *See* Dkt. No. 494.

8. To date, various parties have filed over four hundred (400) proofs of claim against the Debtors. As part of the Claims Reconciliation Process (defined below), the Debtors and their professionals, including, but not limited to, Alvarez & Marsal North America, LLC (collectively, the “**Claims Team**”), have commenced a comprehensive review of all general pre-petition claims, including both the amounts scheduled in the Schedules and the claims asserted in the filed proofs of claim. Through this process, the Claims Team has identified certain claims and scheduled liabilities (the “**Scheduled Liabilities**”) that may be targeted for allowance, disallowance, expungement, reduction and/or reclassification. To avoid possible double or improper recovery by claimants and to reduce the overall number of claims and Scheduled Liabilities, the Debtors are filing a series of omnibus and individual objections to various claims and Scheduled Liabilities in accordance with the requirements of the Court and the Federal Rules of Bankruptcy Procedure.

9. On August 1, 2011, Arkansas Auditor of State (the “**Claimant**”) filed eight unsecured proofs of claim for unspecified amounts against the Debtors (collectively, the

“**Claims**”) based on “unclaimed property.” The Claims are identified as Claim Nos. 465, 466, 467, 468, 469, 470, 471 and 472 on the Claims Register.²

III. OBJECTION

A. **The Claims Lack Sufficient Documentation.**

10. Section 502(a) of the Bankruptcy Code, which governs objections to claims, provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). “If such objection to a claim is made, the court, after notice and a hearing, shall determine the amount of such claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount.” 11 U.S.C. § 502(b).

11. A proof of claim must: “(1) be in writing; (2) make demand on the debtor’s estate; (3) express the intent to hold the debtor liable for the debt; (4) be properly filed; and (5) be based upon facts which would allow, as a matter of equity, to have the document accepted as a proof of claim.” *In re Armstrong*, 320 B.R. 97, 103-04 (Bankr. N.D. Tex. 2005) (citing *In re Circle J. Dairy, Inc.*, 112 B.R. 297, 299-300 (W.D. Ark. 1989)). The fifth requirement is similar to the requisite evidentiary showing in a complaint. Courts will assess *de novo* whether a proof of claim contains facts sufficient to maintain the claim. *In re Circle J. Dairy, Inc.*, 112 B.R. at 300 (“the allegations of the proof of claim must ‘set forth all the necessary facts to establish a claim [because] the proof of claim itself is to be scrutinized with an eye to credibility’”) (internal citations omitted); *In re Armstrong*, 320 B.R. at 104-05 (stating that the evidentiary requirements in Rule 3001 of the Federal Rules of Bankruptcy Procedure require that a proof of claim provide a debtor with “enough information to fully determine whether or not a valid claim in the proper amount has been filed”) (citations omitted). Further, a claim that is “presented in a form that

² A true and correct copy of the Claims are attached hereto as **Exhibit A** and incorporated herein for all purposes.

does not comply with the applicable rules” is not *prima facie* valid. FED. R. BANKR. P. 3007(d)(6).

12. As a bankruptcy court in the Northern District of Texas recently ruled:

A failure to fully comply with Bankruptcy Rule 3001, by failing to attach supporting documentation to a proof of claim, will mean that the proof of claim lacks *prima facie* validity, but will not necessarily mean that it will be disallowed. Without an objection, the claim will be allowed If a debtor objects to a proof of claim for failure to attach supporting documentation, and the creditor fails to supply it thereafter, the court would expect the debtor to request that the claim be disallowed. In such event, the creditor would have the burden of proof to support its claim.

In re Gulley, 400 B.R. 529, 540 (Bankr. N.D. Tex. 2009). *See also In re ASARCO LLC*, No. 05-21207, 2009 WL 2581272, at *2 (Bankr. S.D. Tex. Aug. 19, 2009).

13. If the proof of claim satisfies the requirements of Rule 3001 of the Federal Rules of Bankruptcy Procedure, the claim is entitled to *prima facie* validity. *In re Armstrong*, 320 B.R. 97, 102 (Bankr. N.D. Tex. 2005); *In re Today's Destiny*, No. 05-90080, 2008 WL 5479109, at *4 (Bankr. S.D. Tex. Nov. 26, 2008). The burden is then on the objecting party to articulate a basis for disallowance sufficient to question the claim's *prima facie* validity. *In re Armstrong*, 320 B.R. at 102 (citing *In re Fidelity Houston Co. Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988)); *In re Today's Destiny*, at *4. A valid objection to a *prima facie* valid claim shifts the burden back to the claimant to establish its claim under the burden of proof applicable to the claim. *In re Armstrong*, 320 B.R. at 103 (citing *Raleigh v. Ill. Dep't of Revenue*, 530 U.S. 15 (2000)); *In re Today's Destiny*, at *4.

14. Here, the Claims are not entitled to *prima facie* validity and should be disallowed because the Claimant has failed to present any documentation to support the factual and legal basis for its Claims, and the Debtors are, therefore, unable to determine the validity thereof.

B. The Debtors Do Not Owe Any Liability to the Claimant.

15. Prior to the commencement of these cases, the Debtors maintained, in the ordinary course of business, books and records that reflect, among other things, the Debtors' liabilities and the amounts thereof owed to their creditors (the "**Books and Records**"). Since the Petition Date, the Debtors have continued this practice. The Claims Team is in the process of conducting a comprehensive review and reconciliation of the claims that have been filed against the Debtors, the Books and Records, and the trade and vendor payables that were assumed by Hercules Offshore, Inc. pursuant to the APA to determine the validity of the Claims asserted by the proofs of claim (the "**Claims Reconciliation Process**"). The purpose of the Claims Reconciliation Process is to identify particular claims and categories of claims that may be targeted for disallowance and expungement, reduction and allowance, or reclassification and allowance.

16. During the Claims Reconciliation Process, the Claims Team determined that the Debtors' Books and Records do not demonstrate any liability owed to the Claimant. The Claimant is not entitled to a right to payment from the Debtors because the Debtors do not have any escheatable items due to the Claimant. Accordingly, by this Objection, the Debtors seek entry of an order pursuant to sections 105(a) and 502 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and for the reasons set forth above, disallowing the Claims attached hereto as **Exhibit A** because they lack both legal and factual support. If the Claims are allowed to remain on the Claims Register, the potential exists for a recovery by a party who does not hold a valid claim against the Debtors. Therefore, the Debtors object to the Claims and request entry of an order disallowing and expunging the Claims in their entirety.

IV. RESERVATION OF RIGHTS

17. At this time, the Debtors have not completed their review of the validity of all claims filed against the Debtors' estates, including the Claims objected to herein. Accordingly, the Debtors expressly reserve all rights to object in the future to the Claims on any other grounds permitted by bankruptcy or non-bankruptcy law, and to amend, modify and/or supplement this Objection, including without limitation, to object to amended claims and newly-filed claims. *Southland Corp. v. Kilgore & Kigore (In re Southland Corp.)*, 19 F.3d 1084 (5th Cir. 1994) (stating that an objection to a claim is not required to list every theory of objection so long as the creditor is put on notice that litigation is required to resolve an actual dispute). Nothing in this Objection shall be construed as (i) an admission to the validity of any claim against the Debtors, or (ii) a waiver of the Debtors' rights or the rights of any other party-in-interest to dispute any claim against them.

V. PRAYER

WHEREFORE, PREMISES CONSIDERED, the Debtors respectfully request entry of an order (a) sustaining this Objection; (b) disallowing and expunging the Claims attached hereto as **Exhibit A**; and (c) granting such other and further relief as may be just and proper.

Dated: August 26, 2011
Houston, Texas

Respectfully submitted,

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ Berry D. Spears
Berry D. Spears
State Bar No. 18893300
Johnathan C. Bolton
State Bar No. 24025260
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and

**JORDAN, HYDEN, WOMBLE,
CULBRETH & HOLZER P.C.**

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**ATTORNEYS FOR THE DEBTORS AND
THE DEBTORS-IN-POSSESSION**

B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.) <input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input checked="" type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093)		
NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906 Telephone No. 800-252-4648	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____	
Name and address where payment should be sent (if different from above): Telephone No. _____	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
1. Amount of Claim as of Date Case Filed: <u>\$ Unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges	5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.	
2. Basis for Claim: <u>Unclaimed property</u> (See instruction #2 on reverse side.)	3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)	
3. Last four digits of any number by which creditor identifies debtor: <u>6543</u>	4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____		
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. <div style="text-align: right; font-size: 2em; font-weight: bold; margin-top: 10px;">RECEIVED</div> <div style="text-align: right; font-weight: bold; margin-top: 5px;">FOR COURT USE ONLY</div> <div style="text-align: right; font-size: 1.5em; font-weight: bold; margin-top: 5px;">AUG 0 1 2011</div> <div style="text-align: right; font-size: 0.8em; margin-top: 10px;">KURTZMAN CARSON CONSULTANTS</div>	

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

Exhibit A



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B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
<p style="text-align: center;">Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <input checked="" type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) </div> <div style="width: 30%;"> <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093) </div> <div style="width: 30%;"> <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) </div> </div>		
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Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ <i>(if known)</i> Filed on: _____
Name and address where payment should be sent (if different from above): Telephone No. 800-252-4648		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: <u>\$ unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5.		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges.		
2. Basis for Claim: <u>unclaimed property</u> (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: <u>6629</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
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Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. 	

RECEIVED

FOR COURT USE ONLY
AUG 0 1 2011

KURTZMAN CARSON CONSULTANTS

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Name and address where payment should be sent (if different from above): Telephone No. _____	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
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2. Basis for Claim: <u>Unclaimed property</u> (See instruction #2 on reverse side.)	3. Last four digits of any number by which creditor identifies debtor: <u>3795</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)	
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____	
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:	RECEIVED FOR COURT USE ONLY AUG 0 1 2011 KURTZMAN CARSON CONSULTANTS	
Date: <u>7-15-11</u> Signature: _____ The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.	



B 10 (Official Form 10) (04/10)


UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)		
<input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input checked="" type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093)		
NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906 Telephone No. <u>800-252-4648</u>		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone No. _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: \$ <u>unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
2. Basis for Claim: <u>unclaimed property</u> (See instruction #2 on reverse side.) 3. Last four digits of any number by which creditor identifies debtor: <u>3733</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____		
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. 	

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Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3431
 WORTZMAN CARSON CONSULTANTS



B 10 (Official Form 10) (04/10)


UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
<p style="text-align: center;">Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)</p> <p> <input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input checked="" type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093) </p>		
<p>NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C § 503.</p>		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (if known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone No. 800-252-4648		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: \$ <u>unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
2. Basis for Claim: <u>unclaimed property</u> (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: <u>3682</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____		
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. 	

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Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571. KURTZMAN CARSON CONSULTANTS



B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
<p style="text-align: center;">Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)</p> <p> <input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input checked="" type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093) </p>		
<p>NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.</p>		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone No. 800-252-4648		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: <u>\$ unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
2. Basis for Claim: <u>unclaimed property</u> (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: <u>5918</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____		
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. 	

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B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)		
<input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input checked="" type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093)		
NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906 Telephone No. 800-252-4648		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (if known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone No. _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: <u>\$ unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
2. Basis for Claim: <u>unclaimed property</u> (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: <u>1229</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____		
7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date: <u>7-15-11</u>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	

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Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 357.



B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF CLAIM
Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.) <input type="checkbox"/> Seahawk Drilling, LLC (Case No: 11-20088) <input type="checkbox"/> Seahawk Drilling Management, LLC (Case No: 11-20091) <input type="checkbox"/> Seahawk Global Holdings, LLC (Case No: 11-20094) <input checked="" type="checkbox"/> Seahawk Drilling, Inc. (Case No: 11-20089) <input type="checkbox"/> Seahawk Offshore Management, LLC (Case No: 11-20092) <input type="checkbox"/> Seahawk Drilling USA, LLC (Case No: 11-20095) <input type="checkbox"/> Seahawk Mexico Holdings, LLC (Case No: 11-20090) <input type="checkbox"/> Energy Supply International, LLC (Case No: 11-20093)		
NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): ARKANSAS AUDITOR OF STATE Name and address where notices should be sent: Name ID: 9572525 ARKANSAS AUDITOR OF STATE UNCLAIMED PROPERTY DIVISION PO BOX 251906 LITTLE ROCK AR 72225-1906 Telephone No. <u>800-252-4648</u>	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____	
Name and address where payment should be sent (if different from above): Telephone No. _____	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
1. Amount of Claim as of Date Case Filed: \$ <u>Unknown</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to principal amount of the claim. Attach itemized statement of interest or charges	5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). Amount entitled to priority: \$ _____ * Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.	
2. Basis for Claim: <u>Unclaimed property</u> (See instruction #2 on reverse side.)	6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before November 17, 2010, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____	
3. Last four digits of any number by which creditor identifies debtor: <u>9401</u> 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	7. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 8. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:	
Date: <u>7-15-11</u> Signature: _____ Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	FOR COURT USE ONLY RECEIVED AUG 0 1 2011	

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

KURTZMAN CARSON CONSULTANTS



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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:	§	Chapter 11
	§	
Seahawk Drilling, Inc., <i>et al.</i> ,	§	Case No. 11-20089-RSS
	§	
Debtors.	§	Jointly Administered

**DECLARATION OF THOMAS BEHNKE IN SUPPORT OF DEBTORS’ OBJECTION
SEEKING DISALLOWANCE OF THE PROOFS OF CLAIM FILED BY ARKANSAS
AUDITOR OF STATE (CLAIM NOS. 465, 466, 467, 468, 469, 470, 471 AND 472)**

I, Thomas Behnke, pursuant to 28 U.S.C. § 1746, declare as follows:

1. Except as otherwise indicated, all statements in this declaration are based on my personal knowledge, information and belief, my review and discussion of relevant documents or my opinion based upon my experience and knowledge. To the extent this declaration contains conclusions or statements of law, such statements are based upon advice of counsel and are not intended to be evidentiary, but rather are included for purposes of clarity. If called to testify, I could and would testify to each of the facts set forth herein.

I. BACKGROUND AND OVERVIEW

2. I am a Senior Director with Alvarez & Marsal North America, LLC (“**A&M**”),¹ a restructuring advisory services firm with numerous offices throughout the country. A&M serves as restructuring advisors to Seahawk Drilling, Inc. (“**Seahawk**” or the “**Company**”) and its direct and indirect subsidiaries (collectively, the “**Debtors**”)² in the above-captioned chapter 11 cases. I am authorized to make this Declaration on behalf of A&M.

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection (defined below).

² The debtor-subsiaries of Seahawk are: Seahawk Drilling LLC, Energy Supply International LLC, Seahawk Global Holdings LLC, Seahawk Mexico Holdings LLC, Seahawk Drilling Management LLC, Seahawk Offshore Management LLC and Seahawk Drilling USA LLC. The subsidiaries of Seahawk that are incorporated in Mexico or have branches in Mexico are not a part of this chapter 11 proceeding.

3. At A&M, I work in the Claims Management Services Group, where I assist debtors across a range of industry sectors in the area of claims management. I have over twenty (20) years of experience and have assisted numerous well-known debtors with claims management matters, including Circuit City, Delphi Corporation and Enron Corp. Prior to joining A&M, I was a Managing Director with the Corporate Finance practice of FTI Consulting, Inc. I earned a bachelor's degree in accounting from Northern Illinois University. Additionally, I am a Certified Public Accountant and a member of the Texas Society of Certified Public Accountants and the American Bankruptcy Institute.

4. I submit this declaration in support of the *Debtors' Objection Seeking Disallowance of the Proofs of Claim Filed by Arkansas Auditor of State* (the "**Objection**"), which are identified as Claim Nos. 465, 466, 467, 468, 469, 470, 471 and 472 on the Claims Register.

II. THE CLAIMS RECONCILIATION PROCESS

5. On March 8, 2011, the Court entered the Bar Date Order, wherein the Court set April 22, 2011, as the deadline for non-governmental entities to file proofs of claim (the "**Bar Date**"). *See* Dkt. No. 227. Beginning on or before March 10, 2011, KCC served a copy of the Bar Date Notice and the Bar Date Order on all parties listed on the Debtors' Master Service List. *See* Dkt. Nos. 298, 299, and 371. In addition, KCC published the Bar Date Notice in the following publications: (i) the *Houston Chronicle*, (ii) *The Courier*, (iii) *The Techne News*, and (iv) *The Wall Street Journal*. *See* Dkt. No. 494. Since the Petition Date, various claimants (the "**Claimants**") have filed over four hundred (400) proofs of claim against the Debtors.

6. Prior to the commencement of these cases, the Debtors maintained, in the ordinary course of business, books and records that reflect, among other things, the Debtors'

liabilities and the amounts thereof owed to their creditors (the “**Books and Records**”). Since the Petition Date, the Debtors have continued this practice.

7. The Debtors and their professionals, including, but not limited to, A&M (collectively, the “**Claims Team**”), are in the process of conducting a comprehensive review and reconciliation of the proofs of claim filed against the Debtors (including any supporting documentation attached thereto), the claims set forth therein, the Books and Records, and the trade and vendor payables that were assumed by Hercules Offshore, Inc. pursuant to the APA to determine the validity of the claims asserted by the proofs of claim (the “**Claims Reconciliation Process**”). The purpose of the Claims Reconciliation Process is to identify particular claims and categories of claims that may be targeted for disallowance and expungement, reduction and allowance, or reclassification and allowance.

8. I have been extensively involved in the Claims Reconciliation Process and under my supervision, considerable resources and time have been expended to ensure that there existed a high level of diligence in reviewing and reconciling the claims filed or pending against the Debtors in these cases. The claims were carefully reviewed and analyzed by the appropriate personnel. I have personally reviewed, or have directed someone else under my supervision, to review the proofs of claim filed against the Debtors and compared the information submitted in support thereof with the Books and Records, the Schedules, and the official Claims Register maintained in the Debtors’ chapter 11 cases.

9. Further, I have read the Objection, and I am generally familiar with the information contained therein. The information contained therein is true and correct to the best of my knowledge. Based on the Claims Reconciliation Process, the Claims Team has

determined that certain claims asserted against the Debtors are objectionable, and therefore, the Debtors have filed the Objection.

10. During the Claims Reconciliation Process, the Claims Team determined that the unsecured claims filed on August 1, 2011, by Arkansas Auditor of State (the “**Claimant**”), for alleged “unclaimed property” should be disallowed and expunged because: (i) the Debtors do not have any liability with respect to the Claims, and (ii) the Claims lacks sufficient documentation to support their legal and/or factual basis. The Claimant is not entitled to a right to payment from the Debtors because the Debtors do not have any escheatable items due to the Claimant. Stated differently, the Claims Team has examined the Debtors’ Books and Records and the Claims and has determined that the Debtors do not owe any obligations on account of the Claims.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on this 26th day of August, 2011 at Houston, Texas.

/s/ Thomas Behnke

Thomas Behnke

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:	§	Chapter 11
	§	
Seahawk Drilling, Inc., <i>et al.</i> ,	§	Case No.: 11-20089-RSS
	§	
Debtors.	§	Jointly Administered

ORDER SUSTAINING DEBTORS' OBJECTION SEEKING DISALLOWANCE OF THE PROOFS OF CLAIM FILED BY ARKANSAS AUDITOR OF STATE (CLAIM NOS. 465, 466, 467, 468, 469, 470, 471 AND 472)

Upon considering the *Objection Seeking Disallowance of the Proofs of Claim Filed by Arkansas Auditor of State* (the "**Objection**") filed by the Debtors;¹ and upon the evidence and arguments of counsel provided at the hearing on the Objection; and it appearing that the Court has jurisdiction to consider the Objection and the relief sought therein; and due notice of the Objection and the hearing held thereon having been provided to the Claimant and all parties entitled to such notice in accordance with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules; and a hearing having been held before this Court; and good and sufficient cause appearing therefore, it is FOUND AND DETERMINED that

- (a) the Debtors have no liability with respect to the Claims;
- (b) the Claimant has failed to provide any documentation to support the legal and/or factual basis of its Claims; and
- (c) the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors, and other parties in interest. It is therefore

ORDERED that the Objection is SUSTAINED; and it is further

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

ORDERED that Claim Nos. 465, 466, 467, 468, 469, 470, 471 and 472, the unsecured claims filed against the Debtors (the “**Claims**”), on August 1, 2011, by Arkansas Auditor of State (the “**Claimant**”), are disallowed and expunged in their entirety;

ORDERED that the Debtors’ claims and noticing agent, Kurtzman Carson Consultants LLC, which maintains the claims register in these chapter 11 cases, is authorized to expunge the Claims from the claims register; and it is further

ORDERED that the Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection; and it is further

ORDERED that the terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and it is further

ORDERED that the Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Signed: _____

RICHARD SCHMIDT
UNITED STATES BANKRUPTCY JUDGE