

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:) Case No. 16-50058
)
SEPCO CORPORATION,) Chapter 11
)
Debtor.¹) Judge Alan M. Koschik

SUPPLEMENTAL CERTIFICATE OF SERVICE

I, Alvaro Salas, Jr., depose and say:

1. I am employed by Kurtzman Carson Consultants LLC (“**KCC**”), the claims, noticing and administrative agent for the Debtor in the above-captioned cases. I submit this certificate in connection with the service of solicitation materials (the “**Solicitation Packages**”) for the *Second Amended Plan of Reorganization, as Modified, for Sepco Corporation Under Chapter 11 of the Bankruptcy Code* [Docket No. 664] (the “**Plan**”). I am over the age of 18 and not a party to this action. Except as otherwise noted, I could and would testify to the following based upon my personal knowledge.

2. On February 12, 2016, the Court entered the *Order Authorizing and Approving the Retention and Employment of Kurtzman Carson Consultants LLC as Notice, Balloting, and Claims Agent for the Debtor-in-Possession* [Docket No. 44].

3. Consistent with its retention as noticing, balloting and claims agent, KCC is charged with, among other things, the duty of printing and distributing Solicitation Packages to creditors and other interested parties pursuant to the instructions set forth in the *Motion of the Debtor for an Order Approving (I) the Disclosure Statement; (II) the Solicitation and Voting Procedures; (III) Forms of Ballots; (IV) Deadlines and Procedures to File Objections to the Disclosure Statement and the Plan; (V) a Hearing Date to Consider Confirmation of the Plan; and (VI) the Form, Scope, and Manner of Notice of the Plan and Confirmation Hearing* [Docket No. 527] (the “**Motion**”) filed by the Debtor on February 11, 2019 and the *Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Procedures to Solicit Acceptances of the Proposed Plan; (III) Approving Forms of Ballots Relating to the Plan; (IV) Establishing Deadlines and Procedures to File Objections to the Disclosure Statement and the Plan; (V) Scheduling a Hearing Date to Consider Confirmation of the Plan; and (VI) Approving the Form, Scope, and Manner of Notice of the Plan and Confirmation Hearing* [Docket No. 669] (the “**Solicitation Procedures Order**”), as entered by the Court on December 16, 2019.

4. The Solicitation Packages consist of the following documents:

¹ The last four digits of the Debtor’s federal tax identification number are 7402.



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- a. if applicable, a flash drive (the “**Flash Drive**”) containing the following documents:
 - i. the *Disclosure Statement with Respect to the Second Amended Plan of Reorganization, as Modified, for Sepco Corporation Under Chapter 11 of the Bankruptcy Code* [Docket No. 665];
 - ii. the Plan;
 - iii. the Solicitation Procedures Order, with the Voting Procedures appended as Exhibit 1 (but without any other exhibits);
 - iv. the *Notice of Voting Rights and Hearing to Confirm to the Plan of Reorganization* [Docket No. 690] (the “**Confirmation Hearing Notice**”); and
 - v. Letter to Creditors of Sepco Corporation
- b. either a printed copy of the appropriate Ballot(s) and voting instructions for the voting class in which the creditor is entitled to vote:
 - i. *Class 4 – Asbestos Personal Injury Claims Master Ballot* (the “**Class 4 Master Ballot**”) (substantially in the form attached as Exhibit 2-A to the Solicitation Procedures Order);
 - ii. *Class 5 – Intercompany Claims Ballot* (the “**Class 5 Ballot**”) (substantially in the form attached as Exhibit 2-C to the Solicitation Procedures Order);
- c. or in lieu of a Ballot, the following notice:
 - i. *Notice of Non-Voting Status* (the “**Notice of Non-Voting Status**”) [Docket No. 691];
- d. if applicable, a pre-addressed, postage prepaid return envelope (the “**Return Envelope**”).

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5. On January 16, 2020, at my direction and under my supervision, employees of KCC caused the Class 4 Master Ballot, Flash Drive, and Return Envelope to be served via First Class Mail on the service list attached hereto as **Exhibit A**.

Dated: January 21, 2020

/s/ Alvaro Salas, Jr.

Alvaro Salas, Jr.

Kurtzman Carson Consultants LLC

222 N. Pacific Coast Highway

Suite 300

El Segundo, CA 90245

(310) 823-9000

Exhibit A

Exhibit A

Class 4 Master – Attorneys of Record for Holders of Asbestos Personal Injury
Served via First Class Mail

CreditorName	Address1	City	State	Zip
BARON & BUDD, PC	3102 OAK LAWN AVE SUITE 1100	DALLAS	TX	75219

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