

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

In re:  SHERWIN ALUMINA COMPANY, LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	§ § § § § § §	Chapter 11  Case No. 16-20012  (Jointly Administered) <b>David R. Jones</b>
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**NOTICE OF FILING OF DOCUMENTS RELATED TO  
DEBTORS’ MODIFIED JOINT CHAPTER 11 PLAN  
(Identity and Compensation of the Copano Beds and Ranch Administrator)**

**PLEASE TAKE NOTICE** that on January 4, 2017, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Modified Joint Chapter 11 Plan* [Docket No. 1103] (as may be amended or modified in accordance with the terms thereof, together with all exhibits and supplements thereto, the “Plan”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that the Plan provides that the Debtors will file a Plan Supplement, and that the Plan Supplement will include the identity and compensation of the Copano Beds and Ranch Administrator.

**PLEASE TAKE FURTHER NOTICE** that the Debtors, with the consent of the DIP Lender, intend to select an entity created and managed by Project Navigator Ltd. to serve as the Copano Beds and Ranch Administrator. The material terms of the proposed engagement are subject to ongoing negotiations between the parties (the “Proposed Engagement Terms”). As of the date hereof, the Proposed Engagement Terms are as follows:

- **Fee Structure:** (a) \$240.00 per hour for Roberto Puga; (b) \$190.00 per hour for Senior Project Manager Mark Ferries; (c) \$170.00 per hour for Project Manager Elizabeth Schell; and (d) \$450.00 per hour for Legal Counsel Mary Koks; *provided* that any such fees shall be subject to the terms and conditions of Article IV.B of the Plan.

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number, are: Sherwin Alumina Company, LLC (2376); and Sherwin Pipeline, Inc. (9047). The debtors’ service address is: 4633 Highway 361, Gregory, Texas 78359.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.



- Expenses: The proposed Copano Beds and Ranch Administrator will be reimbursed for its reasonable and documented out-of-pocket costs and expenses as set forth in the Plan.

**PLEASE TAKE FURTHER NOTICE** that copies of the Plan and all other documents filed in these chapter 11 cases are available free of charge by visiting the case website maintained by Kurtzman Carson Consultants LLC, the notice and balloting agent for these chapter 11 cases, available at <http://www.kccllc.net/sherwin> or by calling (866) 927-7091. You may also obtain copies of any pleadings by visiting the Court's website at [www.txs.uscourts.gov](http://www.txs.uscourts.gov) in accordance with the procedures and fees set forth therein.

Respectfully Submitted,

*/s/ Gregory F. Pesce*

Dated: January 6, 2017

Christopher J. Marcus, P.C. (admitted *pro hac vice*)

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**Certificate of Service**

I certify that on January 6, 2017, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Gregory F. Pesce*

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One of Counsel