

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

----- X
In re: : Chapter 11
: :
SUPERIOR ENERGY SERVICES, INC., *et al.*,¹ : Case No. 20-35812 (DRJ)
: :
Reorganized Debtors. : (Jointly Administered)
: :
----- X

**REORGANIZED DEBTORS' FIFTH OMNIBUS OBJECTION TO
CERTAIN CLAIMS (DUPLICATE CLAIMS, EQUITY CLAIMS, INSUFFICIENT
CLAIMS, SATISFIED CLAIMS, AND INCORRECT DEBTOR CLAIMS)**

This is an objection to your claim. This objection asks the court to disallow the claim that you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this objection should locate their names and claims on Schedule 1, Schedule 2, Schedule 3, Schedule 4, or Schedule 5 attached to the proposed form of order attached to this objection.

A hearing will be conducted on this matter on October 19 at 3:00 p.m. (Prevailing Central Time) in Courtroom 400, 4th Floor, United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Street, Houston, Texas 77002. You may participate in the hearing by audio/video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at 832-917-1510. Once connected, you will be asked to enter the conference room number. Judge Jones' conference room number is 205691. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Jones' home page. The meeting code is "JudgeJones". Click the settings icon in the upper right corner and enter your name under the personal information setting.

¹ The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Reorganized Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.



Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the “Electronic Appearance” link on Judge Jones’ home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.

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/> within 30 days from the date this objection was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The above-captioned reorganized debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**,” as applicable) respectfully state the following in support of this omnibus claims objection (this “**Objection**”):

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order (the “**Order**”), substantially in the form attached hereto, disallowing each of the claims identified on **Schedule 1** (the “**Duplicate Claims**”),² **Schedule 2**, (the “**Equity Claims**”), Schedule 3 (the “**Insufficient Claims**”), **Schedule 4** (the “**Satisfied Claims**”), and **Schedule 5** (the “**Incorrect Debtor Claims**”) and collectively, the “**Disputed Claims**”) attached to the Order in their entirety for the following reasons:

- a. each of the Duplicate Claims amends or is duplicative of, either in whole or in part, a previously filed Claim;
- b. each of the Equity Claims is based on an interest in, and not a claim against, the Debtors;
- c. with respect to each of the Insufficient Claims, the Reorganized Debtors are unaware of any liability owed to the claimant, and each Insufficient Claim fails to include sufficient information to determine the basis of such Claim;
- d. each of the Satisfied Claims is based on contract assumed by the Reorganized Debtors and was satisfied during the course of these chapter 11 cases; and

² For the avoidance of doubt, the Objection does not seek to disallow or modify the “Remaining Claims” identified on **Schedule 1** to the Order (collectively, the “**Remaining Claims**”); however, the Reorganized Debtors reserve their rights related thereto.

- e. a review of each of the Incorrect Debtor Claims and the Reorganized Debtors' books and records shows that each Incorrect Debtor Claim was asserted against the wrong Debtor.³

In support hereof, the Reorganized Debtors submit the declaration of Jay Herriman, Managing Director of Alvarez and Marsal North America, LLC, attached here as **Exhibit A**.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a) and 502(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "**Bankruptcy Code**"), rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), rule 3007-1(b) of the Bankruptcy Local Rules for the Southern District of Texas, and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

4. On December 7, 2020 (the "**Petition Date**"), the Debtors filed voluntary petitions for relief in this Court commencing cases (the "**Chapter 11 Cases**") under chapter 11 of the Bankruptcy Code. The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the Chapter 11 Cases, is set forth in detail in the *Declaration of Westervelt T. Ballard, Jr., Chief Financial Officer*

³ For the avoidance of doubt, disallowance of the Incorrect Debtor Claims will not impair the claimants' ability to assert such claims against the appropriate Debtors, as set forth in the Plan.

of the Debtors, in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 8] (the “**First Day Declaration**”), filed on the Petition Date.

5. On January 15, 2021, the Debtors filed their *First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 263] (as may be amended, modified, or supplemented, the “**Plan**”). On January 19, 2021, the Court entered the *Order (I) Approving Disclosure Statement and (II) Confirming the Plan of Reorganization for Hi-Crush Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 289] (the “**Confirmation Order**”). The Plan provides that the Reorganized Debtors are authorized to object to scheduled claims and proofs of claim and interests.⁴ On February 2, 2021, the Plan was substantially consummated, and the Effective Date (as defined in the Plan) occurred.⁵

6. On the Petition Date, Debtor Superior Energy Services, Inc. (the “**Parent**”) filed its schedules of assets and liabilities (“**Schedules**”) and statements of financial affairs, pursuant to Bankruptcy Rule 1007.⁶

7. On December 8, 2020, the Court issued the *Order (I) Establishing (A) Bar Dates and (B) Related Procedures for Filing Proofs of Claim Against Superior Energy Services, Inc. and (II) Approving the Form and Manner of Notice Thereof* [Docket No. 88] (the “**Bar Date Order**”) pursuant to which the Court, among other things, established January 7, 2021 at 5:00 p.m. (Prevailing Central Time) (the “**Parent Bar Date**”), as the deadline for all non-governmental

⁴ Plan Article VIII.

⁵ See *Notice of Effective Date and Entry of Order Approving the Disclosure Statement and Confirming the First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 317].

⁶ See Docket Nos. 24 & 25.

entities⁷ holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code).

THE DISPUTED CLAIMS

8. Each of the Disputed Claims is asserted against the Parent. Based on the Reorganized Debtors’ review of their books and records and the filed proofs of claims, the Reorganized Debtors object to the Disputed Claims for the Reasons set forth below. Accordingly, the Reorganized Debtors request that the Court enter the Order disallowing the Disputed Claims as set forth on **Schedule 1**, **Schedule 2**, **Schedule 3**, **Schedule 4**, and **Schedule 5** to the Order.

I. Duplicate Claims

9. The Reorganized Debtors object to the Duplicate Claims listed in the column labeled “Claims to be Disallowed” on **Schedule 1** to the Order because the Reorganized Debtors have determined that they are duplicates, either in whole or in part, of other proofs of claim filed by or on behalf of the same claimant in respect of the same liabilities against the Parent.

10. This Objection does not affect the Remaining Claims (i.e., those claims listed in the “Remaining Claims” columns on **Schedule 1** to the Order). However, the Reorganized Debtors reserve all rights to object to or otherwise contest the Remaining Claims on any applicable grounds.

II. Equity Claims

11. The Reorganized Debtors object to the Equity Claims because each such claim is asserted on account of equity interests held by the claimant and is therefore not a “claim” as defined in section 101(5) of the Bankruptcy Code.

⁷ The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Parent that arose on or prior to the Petition Date to file written proof of such claim was June 7, 2021 at 5:00 p.m. (prevailing Central Time) (together with the Parent Bar Date, the “**Bar Dates**”).

III. Insufficient Claims

12. The Reorganized Debtors object to the Insufficient Claims because the Insufficient Claims do not contain sufficient information to determine the basis of the Claims. In particular, the section of the proof of claim form indicating what the basis of the claim is was left blank on each Insufficient Claim, and the claimants did not attach any supporting documentation to the Insufficient Claims. The Reorganized Debtors have further reviewed their books and records and do not have any record of any outstanding liabilities owed to the claimants who filed the Insufficient Claims.

IV. Satisfied Claims

13. The Reorganized Debtors object to the Satisfied Claims because the Reorganized Debtors have determined, based on a thorough review of their books and records, that the Satisfied Claims have been satisfied (or released) in full and that no further distributions are required on account of such satisfied (or released) amounts. In particular, all the Satisfied Claims listed on **Schedule 4** to the Order are Claims on account of amounts owed under executory contracts and unexpired leases that the Reorganized Debtors have since cured (if applicable) and assumed.

V. Incorrect Debtor Claims

14. The Reorganized Debtors object to the Incorrect Debtor Claims because a review of each of the Incorrect Debtor Claims and the Reorganized Debtors' books and records shows that each Incorrect Debtor Claim, asserted against the wrong Debtor. In particular, each of the Incorrect Debtor Claims was asserted against the Parent, but a review of the filed proofs of claim and the supporting documentation shows that each Incorrect Debtor Claim actually asserts liability against another Debtor. General unsecured claims against Debtors other than the Parent are treated

under Class 8 and are unimpaired.⁸ As a result, disallowance of the Incorrect Debtor Claims will not impair the claimants' ability to assert such claims against the appropriate Debtors.

BASIS FOR RELIEF

15. Section 502(a) of the Bankruptcy Code provides, in pertinent part, as follows: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.”⁹ Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law”¹⁰ Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection,” which includes the grounds that form the basis of the Reorganized Debtors’ objections to the Disputed Claims.¹¹

16. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code.¹² A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency.¹³ Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence.¹⁴ Despite

⁸ Plan Art. III.B.8.

⁹ 11 U.S.C. § 502.

¹⁰ *Id.* § 502(b)(1).

¹¹ Fed. R. Bankr. P. 3007(d).

¹² *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010).

¹³ *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988).

¹⁴ *Id.*

this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.”¹⁵

17. For the reasons set forth above, the Parent does not have any liability to the claimants on account of the Disputed Claims. Failure to disallow the Disputed Claims could result in the applicable claimants receiving unwarranted or duplicate recoveries, to the detriment of creditors with legitimate claims. Moreover, disallowance of the Disputed Claims will enable the Reorganized Debtors to maintain a more accurate claims register.

RESERVATION OF RIGHTS

18. This Objection is without prejudice to the rights of the Reorganized Debtors or any other party in interest to object to any of the Disputed Claims on any grounds whatsoever, and the Reorganized Debtors expressly reserve all further substantive or procedural objections they may have.

SEPARATE CONTESTED MATTER

19. To the extent that a response is filed regarding any Disputed Claim and the Reorganized Debtors are unable to resolve any such response, each such Disputed Claim, and the Objection as it pertains to such Disputed Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Further, the Reorganized Debtors request that any order entered by the Court regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each claim.

¹⁵ *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the proposed Order, granting the relief requested herein and such other and further relief as may be just and proper.

Signed: September 1, 2021
Houston, Texas

Respectfully Submitted,

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)

Ashley L. Harper (TX Bar No. 24065272)

Philip M. Guffy (TX Bar No. 24113705)

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-and-

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Keith A. Simon (admitted *pro hac vice*)

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Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on September 1, 2021, 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/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A

Herriman Declaration

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

| | | |
|--|---|-------------------------|
| ----- | X | |
| In re: | : | Chapter 11 |
| | : | |
| SUPERIOR ENERGY SERVICES, INC., <i>et al.</i> , ¹ | : | Case No. 20-35812 (DRJ) |
| | : | |
| Reorganized Debtors. | : | (Jointly Administered) |
| | : | |
| ----- | X | |

**DECLARATION OF JAY HERRIMAN IN SUPPORT OF
REORGANIZED DEBTORS' FIFTH OMNIBUS OBJECTION TO
CERTAIN CLAIMS (DUPLICATE CLAIMS, EQUITY CLAIMS, INSUFFICIENT
CLAIMS, SATISFIED CLAIMS, AND INCORRECT DEBTOR CLAIMS)**

I, Jay Herriman, hereby declare under penalty of perjury:

1. I am a Managing Director with Alvarez & Marsal North America, LLC, ("**A&M**"), a restructuring advisory services firm with numerous offices throughout the country.² I, along with my colleagues at A&M, have been engaged by the Reorganized Debtors to provide various restructuring and financial services. In my current position with the Reorganized Debtors, I am responsible for all claims management related matters. I am generally familiar with the Reorganized Debtors' day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Reorganized Debtors' liabilities and the amount

¹ The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Reorganized Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.

² Capitalized terms used but not otherwise defined in this Declaration have the meanings given to them in the Objection.

thereof owed to their creditors as of the Petition Date. I am above 18 years of age, and I am competent to testify.

2. I submit this declaration (this “**Declaration**”) in support of the *Reorganized Debtors’ Fifth Omnibus Objection to Certain Claims (Duplicate Claims, Equity Claims, Insufficient Claims, Satisfied Claims, and Incorrect Debtor Claims)* (the “**Objection**”) and am directly, or by and through the Reorganized Debtors’ advisors and personnel, familiar with the information contained therein and the Disputed Claims. I am authorized to submit this declaration on the Reorganized Debtors’ behalf. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge of the Reorganized Debtors’ operations and finances, information learned from my review of relevant documents, and information I have received from other members of the Reorganized Debtors’ management, the Reorganized Debtors’ employees, or the Reorganized Debtors’ advisors. As to matters regarding state and federal law, including bankruptcy law, I have relied on the advice of counsel. If I were called upon to testify, I could and would testify competently to the facts set forth in this Declaration on that basis.

3. To the best of my knowledge, information, and belief, insofar as I have been able to ascertain after reasonable inquiry, considerable time and resources have been expended to ensure a high level of diligence in reviewing and reconciling the proofs of claim filed against the Reorganized Debtors in the chapter 11 cases. In evaluating the Disputed Claims, the Reorganized Debtors and/or their advisors thoroughly reviewed the Reorganized Debtors’ books and records and the Disputed Claims (as well as any supporting documentation) and have determined that each Disputed Claim should be disallowed in its entirety for the reasons set forth in the Objection. Failure to do so could result in such claimants receiving an unwarranted or duplicate recovery—

to the detriment of creditors with legitimate claims. Thus, I believe that disallowance of the Disputed Claims is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: September 1, 2021

Respectfully submitted,

/s/ Jay Herriman

Jay Herriman, Managing Director
Alvarez & Marsal North America, LLC

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

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|--|---|-------------------------|
| | X | |
| In re: | : | Chapter 11 |
| | : | |
| SUPERIOR ENERGY SERVICES, INC., <i>et al.</i> , ¹ | : | Case No. 20-35812 (DRJ) |
| | : | |
| Reorganized Debtors. | : | (Jointly Administered) |
| | : | |
| | X | |

**ORDER SUSTAINING REORGANIZED DEBTORS' FIFTH OMNIBUS OBJECTION
TO CERTAIN CLAIMS (DUPLICATE CLAIMS, EQUITY CLAIMS, INSUFFICIENT
CLAIMS, SATISFIED CLAIMS, AND INCORRECT DEBTOR CLAIMS)**

Upon the objection (the “**Objection**”)² of the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**”) seeking entry of an order (this “**Order**”) disallowing the Disputed Claims, all as more fully set forth in the Objection; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the Debtors’ notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and the Court having

¹ The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Reorganized Debtors’ address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.

² Capitalized terms used herein but not defined shall have the meanings ascribed to such terms in the Objection.

reviewed the Objection; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. Each Disputed Claim (i.e., each claim listed on Schedule 1, Schedule 2, Schedule 3, Schedule 4, and Schedule 5 hereto) is disallowed in its entirety.

2. Kurtzman Carson Consultants LLC, as claims agent, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Each Disputed Claim and the objections by the Reorganized Debtors to each Disputed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Disputed Claim.

4. The Reorganized Debtors and Kurtzman Carson Consultants LLC are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

5. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Signed: _____, 2021

DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Duplicate Claims

Fifth Omnibus Claims Objection
Schedule 1 - Duplicate Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

| | NAME | DATE FILED | CASE NUMBER / DEBTOR | CLAIM # | CLAIM AMOUNT | NAME | DATE FILED | CASE NUMBER / DEBTOR | CLAIM # | CLAIM AMOUNT |
|---|--|---------------|---|---------|--------------|---|---------------|---|---------|--------------------|
| 1 | GEOFFREY GREENFIELD 3603 SHADOWOOD DR VALRICO, FL 33596 | 05/06/21 | Superior Energy Services, Inc. 20-35812 (DRJ) | 618 | \$ 10,000.00 | THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. ATTN IRA L. HERMAN BLANK ROME LLP 1271 AVENUE OF THE AMERICAS NEW YORK, NY 10020 | 01/05/21 | Superior Energy Services, Inc. 20-35812 (DRJ) | 315 | \$ 827,233,958.33* |
| Reason: The claimant filed the proof of claim on account of a liability for which an agent and/or trustee also filed a proof of claim on behalf of all holders of this debt instrument. | | | | | | | | | | |
| 2 | NEW YORK STATE DEPARTMENT OF TRANSPORTATION NYS DEPARTMENT OF TRANSPORTATION 50 WOLF ROAD ALBANY, NY 12232 | 04/06/21 | Superior Energy Services, Inc. 20-35812 (DRJ) | 607 | \$ 600.00 | NEW YORK STATE DEPARTMENT OF TRANSPORTATION 50 WOLF ROAD ALBANY, NY 12232 | 04/06/21 | Superior Energy Services, Inc. 20-35812 (DRJ) | 609 | \$ 600.00 |

Reason: Claim to be disallowed is an exact duplicate of the remaining claim.

Schedule 2

Equity Claims

Fifth Omnibus Claims Objection
Schedule 2 - Equity Interest Claims

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|---|------------|----------------|--------------------------------|---------|--------------------------|
| 1 | KIN FAI LUK 8563 AQUARIUS DRIVE SAN DIEGO, CA 92126 | 5/10/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 619 | \$ 8,489.70 |
| Reason: The claimant filed the proof of claim on account of an interest, rather than a claim, as defined in Bankruptcy Rule 3007(d)(7). | | | | | | |
| 2 | NUTH, AYLENE D 21538 MICHEALA WAY HUMBLE, TX 77338 | 1/7/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 426 | \$ 9,000.00 |
| Reason: The claimant filed the proof of claim on account of an interest, rather than a claim, as defined in Bankruptcy Rule 3007(d)(7). | | | | | | |
| 3 | VERA C. MCVEY & DAVID C. MCVEY VERA MCVEY 860 UNITED NATIONS PLAZA, 20C NEW YORK, NY 10017 | 6/7/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 630 | \$ 4,113.92 |
| Reason: The claimant filed the proof of claim on account of an interest, rather than a claim, as defined in Bankruptcy Rule 3007(d)(7). | | | | | | |
| | | | | | TOTAL | \$ 21,603.62 |

Schedule 3

Insufficient Claims

Fifth Omnibus Claims Objection
Schedule 3 - Insufficient Documentation Claims

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|--|---|------------|----------------|--------------------------------|---------|-----------------------|
| 1 | JACKSON, DOUGLAS E 309 BEECHGROVE TERR FORT WORTH, TX 76140 | 2/12/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 587 | Undetermined* |
| Reason: The Reorganized Debtors are unaware of any liability owed to the claimant and the claim fails to include sufficient information to determine the basis of the claim. | | | | | | |
| 2 | SPENCER, MARKEY L 1213 1/2 44TH AVE NE TUSCALOOSA, AL 35404 | 4/11/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 611 | Undetermined* |
| Reason: The Reorganized Debtors are unaware of any liability owed to the claimant and the claim fails to include sufficient information to determine the basis of the claim. | | | | | | |
| | | | | | TOTAL | Undetermined* |

Schedule 4

Satisfied Claims

Fifth Omnibus Claims Objection
Schedule 4 - Satisfied Claims

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|---|------------|----------------|--------------------------------|---------|-----------------------|
| 1 | ARCH INSURANCE COMPANY FRANCINE PETROSINO, LEGAL ASSISTANT 210 HUDSON STREET, SUITE 300 JERSEY CITY, NJ 07311 | 1/7/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 425 | Undetermined* |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| 2 | ASPEN AMERICAN INSURANCE COMPANY ATTN KEVIN GILLEN 175 CAPITAL BOULEVARD ROCKY HILL, CT 06067 | 1/4/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 256 | \$ 122,500.00 |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| 3 | CAILLIER, DAVID J 123 MAGAZINE LAFAYETTE, LA 70503 | 12/29/2020 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 162 | \$ 642,419.00 |
| Reason: The claim was filed in relation to the Debtors' Deferred Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 4 | COOK, HAROLD 1520 MAPLE AVE PICAYUNE, MS 39466 | 12/30/2020 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 200 | \$ 13,645.00* |
| Reason: The claim was filed in relation to the Debtors' Workers' Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 5 | HELMSMAN MANAGEMENT SERVICES LLC ATTN DOUG GOODING CHOATE HALL AND STEWART LLP TWO INTERNATIONAL PLACE BOSTON, MA 02110 | 1/6/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 383 | \$ 1,478,700.00* |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| 6 | JASON HENDERSON 12515 CARRIAGE WAY OKLAHOMA CITY, OK 73142 | 1/4/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 294 | \$ 52,436.95 |
| Reason: The claim was filed in relation to the Debtors' Deferred Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |

Fifth Omnibus Claims Objection
Schedule 4 - Satisfied Claims

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|---|------------|----------------|--------------------------------|---------|-----------------------|
| 7 | LIBERTY MUTUAL INSURANCE COMPANY DOUGLAS R. GOODING, ESQ. CHOATE HALL AND STEWART LLP TWO INTERNATIONAL PLACE BOSTON, MA 02110 | 1/6/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 405 | \$ 21,000,000.00* |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| 8 | LIFE INSURANCE COMPANY OF NORTH AMERICA MARYLOU RICE, LEGAL COMPLIANCE LEAD ANALYST 900 COTTAGE GROVE ROAD, B6LPA HARTFORD, CT 06152 | 12/29/2020 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 189 | \$ 63,629.40 |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| 9 | MYSHOCK JR, STANLEY 72961 N 2650 RD HITCHCOCK, OK 73744 | 2/5/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 578 | Undetermined* |
| Reason: The claim was filed in relation to the Debtors' Workers' Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 10 | OWENS, WILLIE J 10843 KALAE ST DIAMONDHEAD, MS 39525 | 1/5/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 306 | \$ 250,000.00 |
| Reason: The claim was filed in relation to the Debtors' Workers' Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 11 | PETERSON, CARLTON T PO BOX 1181 KREBS, OK 74554 | 1/5/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 317 | \$ 11,201.94 |
| Reason: The claim was filed in relation to the Debtors' 401(k) employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 12 | VORENKAMP, STEFFAN 1405 FOXFIRE DRIVE COLLEGE STATION, TX 77845 | 12/29/2020 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 191 | \$ 98,492.00 |
| Reason: The claim was filed in relation to the Debtors' 401(k) employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |
| 13 | WALTERS, BRIAN 111 MERCURY STREET LAFAYETTE, LA 70503 | 5/11/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 620 | Undetermined* |
| Reason: The claim was filed in relation to the Debtors' Workers' Compensation employment plan, which has been assumed by the Debtors. All claimed amounts associated with this employment plan have been satisfied. | | | | | | |

Fifth Omnibus Claims Objection
Schedule 4 - Satisfied Claims

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|--|---|------------|----------------|--------------------------------|---------|--------------------------|
| 14 | ZURICH AMERICAN INSURANCE PO BOX 68549 SCHAUMBURG, IL 60196 | 1/7/2021 | 20-35812 (DRJ) | Superior Energy Services, Inc. | 466 | \$ 1.00 |
| Reason: The claim was filed in relation to an insurance and surety contract, which has been assumed by the Debtors. All claimed amounts associated with this contract have been satisfied. | | | | | | |
| | | | | | TOTAL | \$ 23,733,025.29* |

Schedule 5

Incorrect Debtor Claims

Fifth Omnibus Claims Objection
Schedule 5 - Incorrect Debtor Claims

| NAME | CLAIM# | ASSERTED | | | CORRECTED | | | |
|--|--|----------|--------------------------------|-----------|---------------|----------------------------------|-----------|---------------|
| | | DEBTOR | PRIORITY STATUS | AMOUNT | DEBTOR | PRIORITY STATUS | AMOUNT | |
| 1 | DARREN KING C/O JOHNSON & BISCONI JOHNSON & BISCONI, ATTORNEYS AT LAW 105 N. HUDSON AVENUE, SUITE 100 OKLAHOMA CITY, OK 73102 | 457 | Superior Energy Services, Inc. | Unsecured | \$500,000.00 | Superior Energy Services, L.L.C. | Unsecured | \$500,000.00 |
| Reason: The claim was asserted against Superior Energy Services, Inc. Upon review of the proof of claim, the Debtors determined that the claim should be asserted against Superior Energy Services, L.L.C. | | | | | | | | |
| 2 | MARCUS E WILLIAMS 14018 COUNTY ROAD 297 N KILGORE, TX 75662 | 432 | Superior Energy Services, Inc. | 503(b)(9) | \$1,120.00 | Pumpco Energy Services, Inc. | 503(b)(9) | \$1,120.00 |
| Reason: The claim was asserted against Superior Energy Services, Inc. Upon review of the proof of claim, the Debtors determined that the claim should be asserted against Pumpco Energy Services, Inc. | | | | | | | | |
| 3 | PRIMO WATER NORTH AMERICA BANKRUPTCY PROCESSOR 6750 DISCOVERY BLVD MABLETON, GA 30126 | 495 | Superior Energy Services, Inc. | Unsecured | \$302.67 | Superior Energy Services, L.L.C. | Unsecured | \$302.67 |
| Reason: The claim was asserted against Superior Energy Services, Inc. Upon review of the proof of claim, the Debtors determined that the claim should be asserted against Superior Energy Services, L.L.C. | | | | | | | | |
| TOTAL | | | | | \$ 501,422.67 | TOTAL | | \$ 501,422.67 |