

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

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In re:	: Chapter 11
	: :
SUPERIOR ENERGY SERVICES, INC., <i>et al.</i> , <sup>1</sup>	: Case No. 20-35812 (DRJ)
	: :
Reorganized Debtors.	: (Jointly Administered)
	: :
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**STIPULATION REGARDING PROOF OF  
CLAIM NO. 555 FILED BY TAF WESTWAY PLAZA, LLC**

**WHEREAS**, on December 7, 2020, (the “**Petition Date**”) the above-captioned reorganized debtors (the “**Debtors**” or “**Reorganized Debtors**,” as applicable) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code;

**WHEREAS**, prior to the Petition Date, Debtor SESI, L.L.C. (“**SESI**”) was the lessee under that certain lease agreement (the “**Westway Lease**”), with TAF Westway Plaza, LLC (“**TAF Westway**”) as landlord, for the real property located at 11330 Clay Road, Houston, Texas 77041;

**WHEREAS**, on the Petition Date, the Debtors filed a motion (the “**Lease Rejection Motion**”) [Docket No. 37] seeking to reject the Westway Lease, among others;

**WHEREAS**, on January 8, 2021, the Court entered an order [Docket No. 211] granting the Lease Rejection Motion and authorizing the Debtors to reject the Westway Lease as of the date all property was removed;

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<sup>1</sup> 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.

**WHEREAS**, on January 25, 2021, TAF Westway filed proof of claim number 555 against SESI asserting a general unsecured claim in the amount of \$1,670,869.80 (the “**Lease Rejection Claim**”) on account of damages resulting from the rejection of the Westway Lease;

**WHEREAS**, on January 19, 2021, the Court entered an order (the “**Confirmation Order**”) [Docket No. 289] 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* (as amended, modified, or supplemented, the “**Plan**”);<sup>2</sup>

**WHEREAS**, on February 2, 2021, the Plan was substantially consummated, and the Effective Date occurred;<sup>3</sup>

**WHEREAS**, Article VIII.A.2 of the Plan authorizes the Reorganized Debtors to settle or compromise any Claim and to administer and adjust the Claims Register to reflect any such settlements or compromises without any further notice to or action, order, or approval of the Court; and

**WHEREAS**, TAF Westway and the Reorganized Debtors have engaged in discussions and have reached an agreement on resolution of the Lease Rejection Claim.

**IT IS THEREFORE STIPULATED AND AGREED THAT,**

1. The Reorganized Debtors shall pay TAF Westway \$700,000 (the “**Claim Payment**”) in full and final satisfaction of the Lease Rejection Claim.

2. The Claim Payment shall be made no later than 5:00 pm (prevailing Central Time) on September 24, 2021 by the Reorganized Debtor via a wire transfer to TAF Westway pursuant

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<sup>2</sup> Capitalized terms used but not defined herein have the meanings given to them in the Plan.

<sup>3</sup> 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].

to wire instructions delivered to the Reorganized Debtors contemporaneously with execution of this Stipulation.

3. Except as expressly set forth herein, TAF Westway and the Reorganized Debtors retain all rights under the Plan and Confirmation Order. This stipulation is not an admission of liability, and shall not be treated as a determination of the merits of any claim or defense that was asserted or could be asserted by either party in this or any other proceeding or matter.

4. No other person or entity not a party to this stipulation shall be deemed a third-party beneficiary of any provision of this stipulation or shall otherwise be entitled to enforce any provision hereof.

5. For and in consideration of the terms of this Stipulation and other good and valuable consideration, the Reorganized Debtors hereby release, acquit and forever discharge TAF Westway and its past and present officers, directors, shareholders, members, partners, agents, employees, attorneys, affiliates, parents, subsidiaries, representatives, assigns and successors (collectively, the **“TAF Westway Released Parties”**) from any and all claims, actions, causes of action, charges, demands, liabilities, judgments, losses, fees and other damages of every kind, nature and description whatsoever that the Reorganized Debtors and/or their bankruptcy estates, whether individually or collectively, ever had, now have or may have in the future, whether known or unknown, against any of the TAF Westway Released Parties relating to and/or arising from the Westway Lease and/or Lease Rejection Claim and that arise out of or relate to one or more circumstances that occurred prior to the date of this Stipulation.

6. For and in consideration of the terms of this Stipulation and other good and valuable consideration, subject to and contingent upon TAF Westway’s receipt of the entire Claim Payment, TAF Westway shall and shall be deemed to release, acquit and forever discharge the Reorganized

Debtors, their bankruptcy estates and their past and present officers, directors, shareholders, members, partners, agents, employees, attorneys, affiliates, parents, subsidiaries, representatives, assigns and successors (collectively, the “**Reorganized Debtor Released Parties**”) from any and all claims, actions, causes of action, charges, demands, liabilities, judgments, losses, fees and other damages of every kind, nature and description whatsoever that the TAF Westway ever had, now has or may have in the future, whether known or unknown, against any of the Reorganized Debtor Released Parties relating to and/or arising from the Westway Lease and/or Lease Rejection Claim and that arise out of or relate to one or more circumstances that occurred prior to the date of this Stipulation.

*[Remainder of page intentionally left blank]*

**STIPULATED AND AGREED TO BY:**

September 15, 2021

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

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