

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., *et al.*,¹ : Case No. 20-35812 (DRJ)
:
Reorganized Debtors. : (Jointly Administered)
:
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**CERTIFICATE OF NO OBJECTION REGARDING REORGANIZED DEBTORS’
MOTION TO ESTIMATE CERTAIN CLAIMS (DAVIS LITIGATION CLAIMS)**
[Relates to Docket No. 512]

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**”) hereby certifies as follows:

1. On October 28, 2021, the Reorganized Debtors filed the *Reorganized Debtors’ Motion to Estimate Certain Claims (Davis Litigation Claims)* [Docket No. 512] (the “**Motion**”).
2. Responses to the Motion were due on or before November 18, 2021 (the “**Response Deadline**”). On November 12, 2021, counsel for Amy Davis Warner, Barry Lynn Davis, Clyde Warner, Donna Wray Davis, Larry Calvin Davis, and DJ Equipment Rental & Sales, LLC

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.



(the “**Davis Claimants**”) contacted counsel for the Reorganized Debtors and stated that the Davis Claimants had no objection to the relief sought in the Motion.

3. Accordingly, the Reorganized Debtors respectfully request entry of the proposed agreed order attached hereto.

Signed: November 19, 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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pguffy@HuntonAK.com

Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on November 19, 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

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Reorganized Debtors.	:	(Jointly Administered)
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	X	

**AGREED ORDER GRANTING REORGANIZED DEBTORS' MOTION
TO ESTIMATE CERTAIN CLAIMS (DAVIS LITIGATION CLAIMS)**
[Relates to Docket No. 512]

Upon the motion (the “**Motion**”)² of the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**”) seeking entry of an order (this “**Order**”) estimating the Davis Litigation Claims at the amounts set forth in **Schedule 1** attached hereto, all as more fully set forth in the Motion; 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 Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other

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

notice need be provided; and the Court having reviewed the Motion; and all responses, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion 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 Davis Litigation Claim (each of the claims listed on **Schedule 1** hereto) is allowed as a Class 6 General Unsecured Claim Against Parent in the amount of \$0.00 and is otherwise disallowed.

2. The estimation of the Davis Litigation Claims is without prejudice to the rights, defenses, and objections of the Reorganized Debtors to the merits of the Davis Litigation Claims. The Estimated Amounts do not constitute an admission regarding liability or validity of the Davis Litigation Claims, or recognition of actual amounts owed. The Estimated Amounts are solely to complete the claims administration and to facilitate distribution to unsecured creditors in, and the closing of, these chapter 11 cases. The Estimated Amounts do not represent, and shall not be construed as or be deemed to be estimates regarding amounts of potential liability for the Davis Litigation Claims.

3. Nothing herein shall affect any claims held by the Davis Claimants against any Reorganized Debtor other than the Parent, including SESI, IPS, and Warrior.

4. The entry of this Order is without prejudice to the Davis Claimants' ability to pursue the Davis Litigation against the Reorganized Debtors other than the Parent.

5. 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.

6. 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 Motion.

7. 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

AGREED TO IN FORM AND SUBSTANCE:

Dated: November 15, 2021

/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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Counsel for the Reorganized Debtors

-and-

/s/ Joseph F. Postnikoff

Joseph F. Postnikoff (TX Bar No. 16168320)

LAW OFFICES OF JOSEPH F. POSTNIKOFF, PLLC

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*Counsel for Amy Davis Warner, Barry Lynn Davis,
Clyde Warner, Donna Wray Davis, Larry Calvin Davis,
and DJ Equipment Rental & Sales, LLC*

Schedule 1

Davis Litigation Claims

Schedule 1 - Davis Litigation Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ESTIMATED AMOUNT
1	AMY DAVIS WARNER JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/6/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	388	\$ 0.00
2	BARRY LYNN DAVIS JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/7/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	424	\$ 0.00
3	CLYDE WARNER JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/6/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	387	\$ 0.00
4	DJ EQUIPMENT RENTAL & SALES, LLC JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/7/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	419	\$ 0.00
5	DONNA WRAY DAVIS JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/6/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	386	\$ 0.00
6	LARRY CALVIN DAVIS JOSEPH F. POSTNIKOFF PO BOX 1928 FORT WORTH, TX76101	1/6/2021	20-35812 (DRJ)	Superior Energy Services, Inc.	389	\$ 0.00

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

circumstances and no other notice need be provided; and the Court having reviewed the Motion; and all responses, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion 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 Davis Litigation Claim (~~i.e., each~~ claim of the claims listed on Schedule 1 hereto) is allowed as a Class 6 General Unsecured Claim Against Parent in the amount ~~set forth in the “Estimated Amount” column~~ of \$0.00 and is otherwise disallowed.

2. The estimation of the Davis Litigation Claims is without prejudice to the rights, defenses, and objections of the Reorganized Debtors to the merits of the Davis Litigation Claims. The Estimated Amounts do not constitute an admission regarding liability or validity of the Davis Litigation Claims, or recognition of actual amounts owed. The Estimated Amounts are solely to complete the claims administration and to facilitate distribution to unsecured creditors in, and the closing of, these chapter 11 cases. The Estimated Amounts do not represent, and shall not be construed as or be deemed to be estimates regarding amounts of potential liability for the Davis Litigation Claims.

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

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

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Counsel for the Reorganized Debtors

-and-

/s/ Joseph F. Postnikoff

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Counsel for Amy Davis Warner, Barry Lynn Davis,
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Schedule 1

Davis Litigation Claims

Summary report: Litera® Change-Pro for Word 10.12.0.75 Document comparison done on 11/19/2021 10:01:44 AM	
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Intelligent Table Comparison: Active	
Original DMS: iw://EMFUS.HUNTON.COM/HW_US/87382868/1	
Modified DMS: iw://EMFUS.HUNTON.COM/HW_US/87382868/3	
Changes:	
Add	34
Delete	5
Move From	0
Move To	0
Table Insert	0
Table Delete	0
Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	39