

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

WINDSTREAM HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No.: 19-22313 (RDD)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
DAVID MACGREEVEY OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, David MacGreevey, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“AlixPartners”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I am filing this supplemental declaration to supplement the disclosures that were included in my original declaration dated April 29, 2019 [ECF No. 442], my first supplemental declaration dated June 5, 2019 [ECF No. 607] and my second supplemental declaration dated February 10, 2020 [ECF No. 1498].

4. AlixPartners is currently retained to provide financial advisory services (the “UCC Services”) to the Official Committee of Unsecured Creditors of the Debtors (the “Committee”), as approved by an order of this Court entered on May 16, 2019 [ECF No. 542] (the “UCC

¹ The last four digits of Debtor, Windstream Holdings, Inc.’s tax identification number is 7717. Due to the large number of debtor entities in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/windstream>. The location of the Debtors’ service address for purposes of these chapter 11 cases is: 4001 North Rodney Parham Road, Little Rock, Arkansas 72212.



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Engagement”). The Debtors confirmed their Chapter 11 cases on June 26, 2020 (“Confirmation”). As such, the UCC Engagement has substantially concluded.

5. Following Confirmation, the Debtor has approached a division of AlixPartners known as the Enterprise Improvement division (“EI Division”), which is separate and distinct from the division of AlixPartners that performs turnaround and restructuring services and specifically the UCC Services (“TRS Division”), to assist Windstream in validating its near-term value creation and cost realignment plan, with an emphasis on identifying and backfilling gaps in their Fiscal Year 2020 plan (the “Requested EI Services”).

5. The Debtors were a former client of AlixPartners through its EI Division, having provided pre-petition services to Windstream (the “Windstream Engagement”). The Windstream Engagement Services concluded prior to the commencement of the Debtors’ chapter 11 proceeding and prior to the start of the UCC Engagement. In fact, at the commencement of the UCC Engagement and as part of its retention application, AlixPartners disclosed to the Court that the Debtor was its former client. Additionally, although it was not required, in an abundance of caution, AlixPartners implemented an information barrier (the “Information Barrier”) to prevent the flow of information between the Windstream Engagement team and the UCC Engagement team. That Information Barrier remains in effect.

6. Now that Confirmation has occurred, and given the EI Division’s previous work and knowledge of Windstream, Windstream has requested that the EI Division perform the Requested EI Services. AlixPartners informed the Committee of the Requested EI Services and sought its consent and the Committee has indicated that it has no objection to the EI Division performing the Requested EI Services provided the Information Barrier remains in effect. Additionally, and for the avoidance of doubt there has been and will continue to be no overlap in

the members of the UCC Engagement team providing advisory services to the Committee and the members of the Windstream Engagement team providing EI Services to the Debtors.

7. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration.

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated July 21, 2020

AlixPartners, LLP

/s/ David MacGreevey

David MacGreevey
Managing Director