

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: SANJEL (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50778 Chapter 15
In re: SANJEL CORPORATION, Debtor in a foreign proceeding.	§ § § §	Case No. 16-50784 Chapter 15
In re: SURETECH GROUP LTD., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50786 Chapter 15
In re: SANJEL ENERGY SERVICES (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50795 Chapter 15
In re: SURETECH COMPLETIONS (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50789 Chapter 15
In re: SANJEL CAPITAL (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50783 Chapter 15
In re: TERRACOR GROUP LTD., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50790 Chapter 15
In re: TERRACOR (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50791 Chapter 15
In re: TERRACOR RESOURCES (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50793 Chapter 15
In re: TERRACOR LOGISTICS (USA) INC., Debtor in a foreign proceeding.	§ § § §	Case No. 16-50794 Chapter 15 Joint Administration Pending



DECLARATION OF MICHAEL J. GENEUREUX IN SUPPORT OF (A) EMERGENCY EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND RELIEF PURSUANT TO SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE, AND (B) MOTION FOR AN ORDER (I) SPECIFICALLY RECOGNIZING CANADIAN COURT ORDER AUTHORIZING DEBTORS TO BORROW UNDER A POST-PETITION CREDIT FACILITY, (II) APPROVING LIENS ON ASSETS LOCATED IN THE TERRITORIAL JURISDICTION OF THE UNITED STATES, AND (III) GRANTING ADEQUATE PROTECTION TO PRE-PETITION SECURED PARTIES

I, Michael J. Genereux, declare as follows:

1. I am a Partner in the Restructuring and Special Situations Group at PJT Partners (“PJT”), a provider of financial advisory services listed on the New York Stock Exchange that maintains offices at 280 Park Avenue, New York, New York 10017. PJT is one of the financial advisors to Sanjel Corporation (“Sanjel Corp.”).

2. I am over eighteen (18) years of age, and am competent to testify to the matters stated herein based upon personal knowledge, except for those matters stated upon information and belief, and to those matters, I believe them to be true.

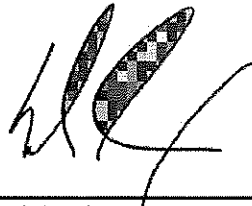
3. I have been the lead partner at PJT with respect to the sales process for Sanjel Corp. (the “SISP”). I have been personally involved at all stages of the SISP, as well as supervising the other members of the PJT team who have been executing the SISP.

4. I have reviewed (a) the *Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code*, and (b) the *Motion for an Order (I) Specifically Recognizing Canadian Court Order Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States, and (III) Granting Adequate Protection to Pre-Petition Secured Parties* and verify that the facts as stated therein are true and correct to the best of my knowledge and belief.

5. I also make this Declaration to certify that the facts as stated in my affidavit (the *Affidavit of Michael J. Genereux*) made in support of the application by Sanjel Corp. and certain of its affiliates for an order under the Canadian *Companies Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, are true and correct to the best of my knowledge and belief. A true and correct copy of my affidavit (without exhibits) is attached to the *Notice of Filing of Documents in Support of First Day Filings*.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Signed: April 4, 2016.



Michael J. Genereux