

2. A detailed description of the Debtors' businesses and the events leading to these chapter 11 cases is fully set forth in the Debtors' motions for joint administration filed on August 26, 2016 in the Debtors' bankruptcy cases, and is incorporated herein by reference.

3. This Court has jurisdiction over the Removed Action under 28 U.S.C. §§ 157 and 1334(b). This matter is a core proceeding under 28 U.S.C. § 157(b), and accordingly, this Court has the authority to hear and determine the Removed Action.

4. Alternatively, the Court has jurisdiction over one or more of the causes of action in the Removed Action pursuant to its "related to" jurisdiction under 28 U.S.C. §§ 157 and 1334(b) and has the authority to hear the Removed Action under 28 U.S.C. § 157(c).

5. To the extent the Court determines that any of the causes of action in the Removed Action are non-core proceedings, the Debtors consent to entry of final orders or judgment by this Court.

6. In accordance with Federal Rule of Bankruptcy Procedure 9027(a)(1) and Local Rule of Bankruptcy Procedure 9027-1, the following are attached as exhibits:

- Exhibit A: Docket Sheet in the State Court Action
- Exhibit B: Petitions and Answers in the State Court Action
- Exhibit C: Court Orders in the State Court Action
- Exhibit D: Other filings in the State Court Action
- Exhibit E: List of Parties
- Exhibit F: List of Counsel

Respectfully submitted,

BAKER BOTTS L.L.P.

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PROPOSED COUNSEL TO DEBTORS-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 26, 2016, a true and correct copy of the foregoing document was filed electronically with the Court and served on counsel for Saeed Rohi at the first address listed below, served on the Texas Attorney General's Office at the second address listed below, and emailed to: brewer@bplaw.com and susan.miller@texasattorneygeneral.gov.

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