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

In re:	:	Chapter 11
LIMETREE BAY SERVICES, LLC, *et al.*[1],	:	Case No. 21-32351 (DRJ)
Debtors.	:	(Jointly Administered)

OFFICIAL COMMITTEE OF UNSECURED CREDITORS' JOINDER TO DEBTORS' RESPONSE AND RESERVATION OF RIGHTS TO THE TERMINAL ENTITIES' MOTION TO ALLOW AND COMPEL PAYMENT OF ADMINISTRATIVE EXPENSES

The Official Committee of Unsecured Creditors (the "Committee") of Limetree Bay Services, LLC, *et al.* (collectively, the "Debtors") hereby submits this joinder (the "Joinder") to *Debtors' Response and Reservation of Rights to The Terminal Entities' Motion to Allow and Compel Payment of Administrative Expenses* [Docket No. 588] (the "Response") to *The Terminal Entities' Motion to Allow and Compel Payment of Administrative Expenses* [Docket No. 435] (the "Motion") filed by the Terminal Entities.[2] In support of this Joinder, the Committee respectfully states as follows:

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC (1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors' mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

[2] The "Terminal Entities" are identified in the Motion as: Limetree Bay Terminals, LLC, Limetree Bay Terminals Holdings, LLC, Limetree Bay Terminals Holdings II, LLC, Limetree Bay Cayman, Ltd., and Limetree Bay Financing, LLC.

JOINDER

1. The Committee hereby joins in, incorporates by reference, and adopts as its own, the arguments and assertions made by the Debtors in the Response. Accordingly, the Committee respectfully submits that the Motion should be denied for the reasons set forth in the Response.

RESERVATION OF RIGHTS

2. Notwithstanding anything contained in this Joinder or the Response, the Committee reserves all rights with respect to the Motion, including the right to supplement this Joinder at or prior to the hearing on the Motion and to raise any arguments in connection with the facts and allegations contained in the Motion.

3. For the avoidance of doubt, nothing contained herein shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") or other applicable non-bankruptcy law; (b) a waiver of the Committee's or any other party in interest's right to dispute any claim on any grounds; (c) a waiver or limitation of the Committee's or any other party in interest's rights under the Bankruptcy Code or any other applicable law; (d) a promise or requirement to pay any claim; or (e) an implication or admission that any particular claim is of a type specified or defined in this Joinder, the Response, or the Motion.

[*Remainder of page intentionally left blank*]

WHEREFORE, the Committee respectfully requests that the Court deny the Motion.

Dated: September 15, 2021

By: */s/ Michael D. Warner*

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CERTIFICATE OF SERVICE

I certify that on September 15, 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/ *Michael D. Warner*
Michael D. Warner