EXHIBIT A

McManigle Declaration

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

In re:	)	**Chapter 11**
	)	
MONTCO OFFSHORE INC., *et al.*[1]	)	**Case No. 17-31646 (MI)**
	)	
Debtors.	)	**(Jointly Administered)**

DECLARATION OF DREW MCMANIGLE IN
SUPPORT OF THE LIQUIDATING TRUSTEE'S FIRST
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (DUPLICATE CLAIMS)

I, Drew McManigle, hereby declare under penalty of perjury:

1. I am a Managing Director of SierraConstellation Partners. I was appointed as the Liquidating Trustee of the Liquidating Trust for the estate of Montco Oilfield Contractors, LLC.

2. I have read the *Liquidating Trustee's First Omnibus Objection to Certain Proofs of Claim (Duplicate Claims)* (the "Objection"),[2] filed contemporaneously herewith, and to the best of my knowledge, information, and belief, the assertions made in the Objection are accurate.

3. MOC maintained books and records reflecting the amounts owed, due, and payable to creditors and I believe those books and records to be accurate. After personnel under my direction reviewed MOC's books and records and the Duplicate Claims (as defined below), I have determined that each disputed claim identified on **Schedule 1** of the Objection (collectively, the "Duplicate Claims") is either duplicative of, or has been amended and replaced by, other proofs of claim filed by or on behalf of the same claimant in respect of the same liabilities. Failure to disallow the Duplicate Claims could potentially result in the relevant claimants receiving double recoveries against the Debtors to the detriment of other creditors. As such, I

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' federal tax identification number, are Montco Offshore, Inc. (1448) and Montco Oilfield Contractors, LLC (9886). The mailing address for the Debtors, solely for the purposes of notices and communications, is 17751 Hwy 3235, Galliano, Louisiana 70354.

[2] Capitalized terms not otherwise defined herein have the meaning ascribed to them in the Objection.

believe that disallowance of the Duplicate Claims on the terms set forth in the Objection and **Schedule 1** is appropriate.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct to the best of my knowledge, information, and belief.

Dated: September 5, 2018

/s/ Drew McManigle
Name: Drew McManigle
Title: Managing Director, SierraConstellation Partners