

**Exhibit C**

Claims Agent Declaration

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
SPORTCO HOLDINGS, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 19-_____ (___)
Debtors.	)	(Joint Administration Requested)
	)	

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**DECLARATION OF TINAMARIE FEIL IN SUPPORT OF  
THE DEBTORS’ APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING  
EMPLOYMENT AND RETENTION OF BMC GROUP, INC. AS CLAIMS AND  
NOTICING AGENT *NUNC PRO TUNC* TO THE PETITION DATE**

I, TINAMARIE FEIL, under penalty of perjury, declare as follows:

1. I am the President of BMC Group, Inc. (“BMC”), a chapter 11 administrative services firm that specializes in the administration of large bankruptcy cases. BMC’s corporate offices are located at 600 First Avenue, Seattle, WA 98104. I am duly authorized to make this declaration on behalf of BMC. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. This Declaration is made in support of the *Debtors’ Application for Entry of an Order Authorizing Employment and Retention of BMC Group, Inc. as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date*, which was filed contemporaneously herewith (the “Application”).<sup>2</sup>

3. BMC is comprised of leading industry professionals with significant experience in both the legal and administrative aspects of large, complex chapter 11 cases. BMC’s professionals

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<sup>1</sup> The Debtors, together with the last four digits of each Debtor’s federal tax identification number, are: Bonitz Brothers, Inc. (4441); Ellett Brothers, LLC (7069); Evans Sports, Inc. (2654); Jerry’s Sports, Inc. (4289); Outdoor Sports Headquarters, Inc. (4548); Quality Boxes, Inc. (0287); Simmons Guns Specialties, Inc. (4364); SportCo Holdings, Inc. (0355); and United Sporting Companies, Inc. (5758). The location of the Debtors’ corporate headquarters and the service address for all Debtors is 267 Columbia Ave. Chapin, SC, 29036.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Order have the meanings ascribed to such terms in the Application.

have experience in noticing, claims administration, solicitation, balloting, and facilitating other administrative aspects of chapter 11 cases and experience in matters of this size and complexity. BMC's professionals have acted as debtor's counsel or official claims and noticing agent in many large bankruptcy cases in this district and in other districts nationwide. BMC's recent cases in this and other districts include: *In re JRV Group USA L.P.*, 19-11095 (CS) (Bankr. D. Del. 2019); *In re Kiko USA, Inc.*, 18-10069 (MW) (Bankr. D. Del. 2018); *In re CCHG Liquidating Co.*, 12-01220 (JW) (Bankr. D.S.C. 2012); *In re Venoco, Inc.*, No. 16-10655 (KG) (Bankr. D. Del. 2016); *In re Restaurants Acquisition I, LLC*, No.15-12406 (KG) (Bankr. D. Del. 2015); *In re F-Squared Investment Management, LLC*, No. 15-11469 (LSS); *In re RAAM Global Energy Corporation*, No. 15-35615 (Bankr. S.D. TX Dec. 7, 2015); *In re Atari, Inc.*, No. 13-10176 (JMP) (Bankr. S.D.N.Y. Feb. 15, 2013); and *In re Jennifer Convertibles, Inc.*, No. 10-13779 (ALG) (Bankr. S.D.N.Y. July 22, 2010).

4. As agent and custodian of court records under 28 U.S.C. § 156(c), BMC will perform, at the request of the Office of the Clerk of the Bankruptcy Court (the "Clerk"), the services specified in the Application and the Engagement Agreement, and, at the Debtors' request, any related administrative, technical, and support services as specified in the Application and the Engagement Agreement. In performing such services, BMC will charge the Debtors the rates set forth in the Engagement Agreement, which is attached as **Exhibit B** to the Application.

5. BMC represents that:

- a) BMC is not a creditor of the Debtors;
- b) BMC will not consider itself employed by the United States government and will not seek any compensation from the United States government in its capacity as Claims and Noticing Agent in these Chapter 11 Cases;
- c) By accepting employment in these Chapter 11 Cases, BMC waives any rights to receive compensation from the United States government in connection with these Chapter 11 Cases;

- d) In its capacity as Claims and Noticing Agent in these Chapter 11 Cases, BMC will not be an agent of the United States and will not act on behalf of the United States;
- e) BMC will not employ any past or present employees of the Debtors in connection with its work as Claims and Noticing Agent in these Chapter 11 Cases;
- f) BMC is a “disinterested person” as that term is defined in Bankruptcy Code section 101(14) for the matters on which it is engaged;
- g) In its capacity as Claims and Noticing Agent in these Chapter 11 Cases, BMC will not intentionally misrepresent any fact to any person;
- h) BMC’s receipt and recordation of claims (if any) and claim transfers will fall under the supervision and control of the Clerk’s office;
- i) BMC will comply with all requests of the Clerk’s office and the guidelines promulgated by the Judicial Conference of the United States for the implementation of 28 U.S.C. § 156(c); and
- j) The Clerk’s office will bear none of the costs of BMC’s services as Claims and Noticing Agent in these Chapter 11 Cases.

6. Although the Debtors by this Application do not propose to retain BMC under Bankruptcy Code section 327 (such retention will be sought by separate application), I authorized our conflicts system to review the names of all known potential parties in interest (the “Potential Parties in Interest”) in these Chapter 11 Cases. The list of Potential Parties in Interest was provided by the Debtors and included, among other parties, the Debtors, non-Debtor affiliates, directors and officers of the Debtors, equity interest holders, secured creditors, and the Debtors’ largest unsecured creditors on a consolidated basis. BMC professionals under my supervision compiled and reviewed the results of the conflicts check. As set forth in further detail herein, BMC is not currently aware of any relationship that would present a disqualifying conflict of interest. Should BMC discover any new relevant facts or relationships bearing on the matters described herein during the period of its retention, BMC will use reasonable efforts to promptly file a supplemental declaration.

7. To the best of my knowledge, and based solely on information provided to me by the Debtors, and except as detailed herein, neither BMC nor any of its professionals has any materially adverse connection to the Debtors, their creditors, or other relevant parties. BMC may have relationships with certain of the Debtors' creditors as vendors or in connection with cases in which BMC serves or has served in a neutral capacity as Claims and Noticing Agent or administrative advisor for another chapter 11 debtor.

8. BMC has and will continue to represent clients in matters unrelated to these Chapter 11 Cases. In addition, BMC has and will continue to have relationships in the ordinary course of its business with certain vendors, professionals, and other parties in interest that may be involved in these Chapter 11 Cases. There is also a possibility that BMC will provide professional services to entities or persons that may be creditors or parties in interest in these Chapter 11 Cases—though such services would not directly relate to, or have any direct connection with, these Chapter 11 Cases or the Debtors.

9. BMC and its personnel in their individual capacities regularly use the services of law firms, accounting firms, and financial advisors. Such firms engaged by BMC or its personnel may appear in these Chapter 11 Cases representing the Debtors or parties in interest. All engagements in which such firms represent BMC or its personnel in their individual capacities are unrelated to these Chapter 11 Cases.

10. To the best of my knowledge, neither BMC nor any of its partners or employees represents any interest materially adverse to the Debtors' estates with respect to any matter on which BMC is to be engaged. Based on the foregoing, I believe that BMC is a "disinterested person" as that term is defined in Bankruptcy Code section 101(14).

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Executed on June 10, 2019

*/s/ Tinamarie Feil*

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Tinamarie Feil  
President