

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
	§	Case No. 20-43597-399
BRIGGS & STRATTON, CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
	§	
Debtors.	§	

**SUPPLEMENTAL DECLARATION OF PATRICK G. QUICK  
IN SUPPORT OF APPLICATION OF DEBTORS  
FOR AN ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF FOLEY & LARDNER LLP AS SPECIAL  
COUNSEL FOR THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Patrick G. Quick, declare, under penalty of perjury, that the following is true and correct to the best of my knowledge and belief:

1. I am a partner of the law firm of Foley & Lardner LLP (“**Foley**”), an international law firm with offices across the United States and in Brussels, Belgium; Tokyo, Japan; and Mexico City, Mexico. I am admitted, practicing, and a member in good standing of the bar of the State of Wisconsin. There are no disciplinary proceedings pending against me.

2. I submit this declaration (this “**Supplemental Declaration**”) to supplement the disclosures contained in my initial declaration, dated July 20, 2020 (the “**Initial Declaration**”), in support of the *Application of Debtors for an Order Authorizing the Retention and Employment of Foley & Lardner LLP as Special Counsel for the Debtors Effective as of the Petition Date* (the “**Application**”) [Docket No. 33].<sup>1</sup>

<sup>1</sup> Capitalized terms used but not defined herein have the meanings given to them in the Application.



3. Except as otherwise indicated, all facts set forth in this Supplemental Declaration are based upon my personal knowledge, information supplied to me by other Foley professionals or paraprofessionals, or my review of relevant documents.

4. Subsequent to the filing of the Initial Declaration, the Debtors and their advisors updated the Debtors' parties in interest list to add certain other parties in interest to include (i) Debtor Counsel for Non-Restructuring Matters; (ii) Ordinary Course Professional Service Providers; (iii) Other Significant Contract Counterparties; (iv) Professional Service Providers to the Stalking Horse Bidder; (v) Stalking Horse Bidder; (vi) Additional ABL Party and (vii) Additional Utility Service Providers. In accordance with the procedures described in the Application and Initial Declaration, Foley has reviewed such updated parties in interest list and conducted additional searches within its records so as to include these additional parties as well as other parties-in-interest. These additional parties, along with all other parties for which Foley has conducted searches of its client relationships, are identified on **Appendix 1** hereto.

5. Based on such additional searches, Foley makes the supplemental disclosure attached as **Appendix 2** hereto. To the best of my knowledge, information, and belief, neither Foley nor any of its professional personnel have any relationship with the Debtors that would impair Foley's ability to perform services for the Debtors.

6. As stated in the Initial Declaration, based on the conflicts search conducted to date and described herein or in the Initial Declaration, to the best of my knowledge, none of Foley or any partner, senior counsel, or associate thereof, insofar as I have been able to ascertain, represents or holds any interest adverse to the Debtors or their estates with respect to the matters on which Foley is to be employed, except as disclosed or otherwise described herein or in the Initial Declaration.

7. To the extent any information disclosed herein requires amendment or modification as additional party-in-interest information becomes available to Foley, a further supplemental declaration will be submitted to this Court reflecting such amended or modified information.

Pursuant to 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.

Dated: August 7, 2020  
Milwaukee, Wisconsin

/s/ Patrick G. Quick  
Patrick G. Quick  
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**Appendix 1**

Potential Parties In Interest for Supplemental Disclosure

**Debtor Counsel for Non-Restructuring Matters**

Adams Pluck  
Bär & Karrer Ltd.  
Boss & Young  
Clarke Modet & Co  
Clint Lawyers and Mediators  
Davies Collision Cave Pty Ltd.  
Eversheds Sutherland Limited  
Fromont Briens  
Gerlach  
GQ Employment Law LLP  
Grunecker, Kinkeldey, Stockmair  
Hansen Reynolds LLC  
Hansen Riederer Dickinson Crueger  
Intellectual Property Associates  
MacPherson+Kelley Lawyers  
Magnell & Partners Advokatfirma KB  
Marks & Clerk Hong Kong  
Mazutti Ribas Stern Sociedade  
McElroy Deutsch Mulvaney  
PCS Paruch Chruściel Schiffter  
Ploum Rotterdam Law Firm  
Rouse & Co International LLP  
Rouse Frets White Goss Gentile Rhodes, P.C.  
Spruson & Ferguson  
Sunray Intellectual Property Attorney's  
Vanguard  
Walder Wyss Ltd.  
Zhong Lun Law Firm

**Ordinary Course Professional Service Providers**

Wisconsin Property Tax Consultants

**Other Significant Contract Counterparties**

ATACO Steel Products Corp.  
Block Midland Group  
Brenda Kelley  
Catamount Constructors, Inc.  
Elgin Fastner Group, LLC  
First Industrial Realty Trust  
G3 Industries  
Georgia Deer Farm

Harcross Chemicals Inc.  
Mazak Optonics Corp.  
Milwaukee Brewers Baseball Club, L.P.  
Pro Metal Works, LLC  
Propulse  
Roller Bearing Company of America  
Southgate Lease Services, Inc.  
Southgate Leasing Corporation

**Professional Service Providers To The Stalking Horse Bidder**

Alvarez & Marsal  
AON  
Deloitte Accounting  
Kirkland & Ellis  
KPMG  
Littler Mendelson  
McKinsey & Company  
PwC  
Spilman Thomas & Battle  
Wood Group

**Stalking Horse Bidder**

KPS Capital Partners, LP

**ABL**

US Bank, NA

**Utility Service Providers**

121 Disposal Company LLC  
Diversified Alarm Services Inc.

**Appendix 2**

Current or Former Clients of Foley and Foley Attorneys for Supplemental Disclosure

<b><u>Entity Name</u></b>	<b><u>Current Foley Client</u></b>	<b><u>Former Foley Client</u></b>	<b><u>Name of Entity or Affiliated Entity is a Foley Client</u></b>
AON	X	X	AON CORPORATION, HEWITT ASSOCIATES LLC
BOSS & YOUNG	X*		BOSS & YOUNG PATENT AND TRADEMARK LAW OFFICE
CLARKE MODET & CO	X		
DAVIES COLLISION CAVE PTY LTD	X		
DELOITTE ACCOUNTING	X*		DELOITTE CONSULTING, DELOITTE & TOUCHE, DELOITTE TAX & CONSULTING, DELOITTE & TOUCHE, INC.
EVERSHEDS SUTHERLAND LIMITED	X*		EVERSHEDS LLP, EVERSHEDS DEUTSCHLAND LLP
GRUNECKER, KINKELDEY, STOCKMAIR	X		
MARKS & CLERK HONG KONG	X*		MARKS & CLERK LLP, MARKS & CLERK
MCKINSEY & COMPANY	X	X	
MERCURY MARINE <sup>1</sup>	X*	X	BRUNSWICK CORPORATION
MILWAUKEE BREWERS BASEBALL CLUB LP	X		
SPRUSON & FERGUSON	X		
VANGUARD	X*		VANDUTCH, INC., A/K/A VANGUARD DUTCH MARINE LTD., VANGUARD LED DISPLAYS, VANGUARD COVERAGE, REPUBLIC-VANGUARD INSURANCE COMPANY
WALDER WYSS LTD	X		
WOOD GROUP	X*	X*	JOHN WOOD GROUP PLC, AMEC FOSTER WHEELER PLC, WOOD LAW GROUP, WOOD GROUP MANAGEMENT SERVICES, INC.
ALVAREZ & MARSAL		X*	ALVAREZ & MARSAL CANADA, INC., ALVAREZ & MARSAL REAL ESTATE ADVISORY SERVICES, LLC
ATACO STEEL PRODUCTS CORP.		X	
FIRST INDUSTRIAL REALTY TRUST		X	
HARCROS CHEMICALS INC.		X	

<sup>1</sup> In the Initial Declaration, Foley listed Mercury Marine as a former client. Upon further analysis, Foley determined that Mercury Marine is a current client of Foley through work performed for its parent company, Brunswick Corporation. This work on behalf of Mercury Marine and its affiliates is for certain matters unrelated to the Chapter 11 Cases and not with respect to those matters on which Foley is to be employed.

<u>Entity Name</u>	<u>Current Foley Client</u>	<u>Former Foley Client</u>	<u>Name of Entity or Affiliated Entity is a Foley Client</u>
KIRKLAND & ELLIS		X	
KPS CAPITAL PARTNERS		X*	KPS SPECIAL SITUATIONS FUNDS III (SUPPLEMENTAL A/V), LP, KPS SPECIAL SITUATIONS FUNDS III (SUPPLEMENTAL), LP, KPS FUNDS
MAZAK OPTONICS CORP.		X*	MAZAK CORPORATION
ROLLER BEARING COMPANY OF AMERICA		X*	RBC BEARINGS INCORPORATED
ROUSE & CO INTERNATIONAL LLP		X*	ROUSE & CO.
WISCONSIN PROPERTY TAX CONSULTANTS		X	
ZHONG LUN LAW FIRM		X	

\* Denotes individual parties in interest whose names appear in Foley’s client database, but who may be the same individual or entity as the party identified in the party in interest list.