

4. On June 7, 2023, I submitted the *First Supplemental Declaration of A. Cotten Wright, in Support of the Ex Parte Application for Order Authorizing the Employment of Grier Wright Martinez, PA as Counsel for the Future Claimants' Representative, Joseph W. Grier, III*. [Dkt. No. 1799].

5. The facts set forth in this Second Supplemental Declaration are based on my personal knowledge and on records maintained by GWM in the ordinary course of business and have been reviewed by me and/or by other partners or employees of GWM at my direction, or on information known by other partners or employees of GWM and conveyed to me.

6. On October 17, 2024, GWM and Michael L. Martinez, a member of GWM, engaged C. Richard Rayburn, Jr. ("Rayburn"), Ross R. Fulton, ("Fulton"), and Rayburn Cooper & Durham, PA ("RCD") to represent GWM and Mr. Martinez in litigation pending before the North Carolina Business Court relative to *Halifax Safeguard Property, LLC v. Michael Martinez and Grier Wright Martinez, PA*, Case No. 24CV045898-590 (the "Halifax Litigation").

7. The involvement of Martinez and GWM in the Halifax Litigation is unrelated to the Debtors and these Chapter 11 cases.

8. Rayburn, Fulton, and RCD represent the Debtors in this case. The work that Rayburn, Fulton, and RCD will perform in representing Martinez and GWM in the Halifax Litigation is unrelated to the Debtors and these Chapter 11 cases.

9. I do not believe that RCD's representation of Martinez and GWM affects the disinterestedness of GWM in these cases.

10. Further, both GWM and I will use reasonable efforts to identify any additional relevant facts or relationships not previously disclosed. If any fact or relationship is discovered, I will, as soon as reasonably practicable, file an additional supplemental declaration with the Court.

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.

This is the 25th day of October, 2024.

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

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