

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.	§	

SECOND 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 second supplemental declaration (this “**Second Supplemental Declaration**”) to supplement the disclosures contained in my (i) 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],¹ and (ii) supplemental declaration, dated August 7, 2020 [Docket No. 328] (the “**Supplemental Declaration**”), in further support of the Application.

¹ 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 Second 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 and Supplemental Declaration, the Debtors and their advisors updated the Debtors' parties in interest list to add certain other parties in interest to include (i) Ad Hoc Group of Senior Noteholders; (ii) Members of Unsecured Creditors Committee; (iii) Other Significant Contract Counterparties; and (iv) the United States Trustee. In accordance with the procedures described in the Application, Initial Declaration, and Supplemental Declaration, Foley has reviewed such updated parties in interest list and conducted additional searches within its records so as to include these additional parties in its review. These additional parties 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 has any relationship with the entities identified on Appendix 2 that would impair Foley's ability to perform services for the Debtors with respect to the matters on which Foley is employed.

6. Based on the conflicts search conducted to date and described herein or in the Initial Declaration and Supplemental 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 employed, except as disclosed or otherwise described herein or in the Initial Declaration and Supplemental 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: September 3, 2020
Milwaukee, Wisconsin

/s/ Patrick G. Quick
Patrick G. Quick
Foley & Lardner LLP
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Appendix 1

Additional Parties

Ad Hoc Group of Senior Noteholders

ATALAYA CAPITAL MANAGEMENT
BARINGS
COHANZICK MANAGEMENT LLC
CROSSING BRIDGE ADVISORS LP

Members and Professionals of Unsecured Creditors Committee

PENSION BENEFIT GUARANTY CORPORATION
HOFFER PLASTICS CORPORATION
WILMINGTON TRUST N.A.
A R NORTH AMERICA
THOMAS R SAVAGE
JAMES E BRENN
JIANGSU JIANGHUAI ENGINE CO LTD
DOSTER, ULLOM & BOYLE LLC
BROWN RUDNICK LLP

Other Significant Contract Counterparties

A.B. BOYD CO
AAVID THERMALLOY LLC
AIRMAN USA CORP
ALLEGIS CORPORATION
ALLGREEN SERVICES LLC
ANFAN INTERNATIONAL CO LTD
ARGO PRODUCTS COMPANY
ASHLEY F WARD INC. DBA FITECH INC.
ATLAS METAL PARTS & FABRICATING INC
CENTRO INC
CHAO LONG MOTOR PARTS CORP
CHONGQING JILI YUNFENG INDUSTRY (GROUP) CO, LTD
CHONGQING KUALITE INDUSTRY AND TRADE CO LTD
CHONGQING MARS SPECIAL METAL FORMING CO LTD
CHONGQING PANDA MACHINERY CO LTD
CHONGQING QINGJIAN MACHING PART CO LTD
CHONGQING SANAI HAILING INDUSTRIAL CO LTD
CHONGQING ZHENJIAN IMPORT AND EXPORT TRADE CO LTD
CHONGQUING CHANGJIANG BEARING CO LTD
COLISEUM ELECTRIC CORPORATION
COPE PLASTICS INC
CUSTOM ENGINEERING WHEELS INC

DAIDO METAL USA INC
DANTHERM S.P.A.
DELPHI CORPORATION
DELPHI POWERTRAIN SYSTEMS LLC
DIVERSIFIED
DIVERSITECH
DON HAGAN & SONS INC
ENGINEERED SALES
EXIDE TECHNOLOGIES LLC
FEDERAL-MOGUL VALVETRAIN
FLEXAUST COMPANY INC
FREUDENBERG-NOK GENERAL PARTNERSHIP
FUZHOU AUTOPARTS INDUSTRIES CO LTD
FUZHOU FUCHUAN RUBBER CO LTD
GH TOOL & MOLD INC
HARCROS CHEMICALS INC
HOKKY ELECTRONICS (SHANGHAI) CO LTD
ICF INDUSTRIES INC
IMPCO
INNOVATIVE TECHNOLOGIES
INTRADIN (SHANGHAI) INPORT & EXPORT CO LTD
JAS FORWARDING USA INC
JIANGSU LONGHOM MECHATRONICS CO LTD
JINAN ALBERT TRADING CO LTD
JULIAN ELECTRIC INC
KANEMATSU USA INC
KRONOS INC
LAKEVIEW INDUSTRIES INC
LANGFANG KOKUSAN ELECTRIC CO LTD
LINZ ELECTRIC
LOMONT MOLDING LLC
MAIL THERMAL AND ACCUSTICAL MANAGEMENT
MATERIAL HANDLING TECHNOLOGIES I
MAX TOOL INC
MEDART INC
MING LIU/ARIES INTERNATIONAL
MIRO MANUFACTURING INC
MTD
MUTHIG INDUSTRIES INC
NINGBO JINXIN POWDER METALLURGY CO
NINGBO XIANGYUAN DANHONG MACHINERY
NITTO INC
OPTIBELT
PACKAGING SOLUTIONS INC
PLASMAN GROUP/THERMOTECH
PRICE ERECTING INC

PRYOTECK INC
RHINO TOOL HOUSE
RIDGE TOOL MANUFACTURING CO
RITUS CORPORATION
RR DONNELLEY
SCHIEFFER CO. INTERNATIONAL LLC
SEDEMAC MECHATRONICS (PVT) LTD
SENTEC HANOI CO LTD
SHANDONG WEIDA INTERNATIONAL TRADING
SHANDONG WEIDA MACHINERY CO LTD
SHANDONG ZHENTINGJIANGONG PISTON CO LTD
SHANGHAI DONG FENG MOTOR INDUSTRY IMP / EXP CO LTD
SHANGHAI ELECTRICAL APPARATUS IMP & EXP LTD
SHANGHAI SI RUIFU MACHINERY & ENGINEERING CO LTD
SICHUAN FUXIANG TECHNOLOGY CO LTD
SOUTHERN TOOL
STEEL CRAFT CORP
STRAIGHT 72 INC DBA MAI MANUFACTURING
SUSSEX IM INC
SUZHOU ZHONGCHENG HENGXIE BEARING CO LTD
TECOMEC S.R.L. - SOCIO UNICO
THE CLEVELAND CANVAS GOODS MFG CO
TOOL & DYE
TROY CRAIG (DICELLO LEVITT GUTZLER)
TUFF TORQ CORP
UFP TECHNOLOGIES INC
W.W. GRAINGER INC
WOLONG INTERNATIONAL (HONGKONG) LTD
XIAMEN GOODWILL ELASTOMERICE CO LTD
XIAMEN RIKEN INDUSTRIAL CO LTD
XIAMEN SENTEC E&E CO LTD
XPO
YUEQING RIYUE MACHINE ELECTRICITY CO LTD
YUHUAN JUXIN MACHINERY CO LTD
ZHEJIAN CONSTANT POWER MACHINERY
ZHEJIAN MEILI HIGH TECHNOLOGY CO LTD
ZHEJIANG BO XING INDUSTRY AND TRADE CO LTD
ZHOSHAN HAISHAN MACHINERY & SEALING MATERIALS CO LTD
ZIGONG CHUANLI TECHNOLOGY CO LTD
ZMONDAY (ZHEJIAN ZHOULI INDUSTRIAL CO LTD)

United States Trustee

SIRENA T. WILSON

Appendix 2

Supplemental List of Connections

Entity Name	Current Foley Client	Former Foley Client	Name of Entity or Affiliated Entity that is/was a Foley Client
ATALAYA CAPITAL MANAGEMENT	X*	X	ACM ALAMOSA DA LLC [CURRENT]
BARINGS	X*	X*	BARINGS MULTIFAMILY CAPITAL [CURRENT]; BARINGS LLC [FORMER]
BROWN RUDNICK LLP		X	
DELPHI CORPORATION	X*	X	NEXTEER AUTOMOTIVE [CURRENT]; DELPHI AUTOMOTIVE SYSTEMS [FORMER]
DIVERSIFIED	X*	X*	DIVERSIFIED TOOLING GROUP [CURRENT]; DIVERSIFIED TECHNOLOGY INC, DIVERSIFIED METAL ENGINEERING BREWING SERVICES, DIVERSIFIED PRODUCTS INC, DIVERSIFIED ENGINEERING [FORMER]
EXIDE TECHNOLOGIES LLC		X	
FEDERAL-MOGUL VALVETRAIN		X	
FREUDENBERG-NOK GENERAL PARTNERSHIP	X		
HARCROS CHEMICALS INC		X	
IMPCO		X*	IMPCO TECHNOLOGIES INC
INNOVATIVE TECHNOLOGIES		X	
MTD	X*	X*	MTD HOLDINGS LLC [CURRENT]; MTD PRODUCTS INC [FORMER]
NITTO INC	X*	X*	NITTO DENKO CORP [CURRENT]; NITTO AMERICAS INC, NITTO DENKO AUTOMOTIVE INC, NITTO DENKO TECHNICAL CORPORATION [FORMER]
PENSION BENEFIT GUARANTY CORPORATION		X	

Entity Name	Current Foley Client	Former Foley Client	Name of Entity or Affiliated Entity that is/was a Foley Client
PRICE ERECTING INC		X*	RIDGWAY LLC DBA PRICE ERECTING CO
PRYOTECK INC	X*		PYROTEK E3 LLC
RIDGE TOOL MANUFACTURING CO		X*	RIDGE TOOL COMPANY, THE
RR DONNELLEY		X	
SEDEMAC MECHATRONICS (PVT) LTD	X		
STEEL CRAFT CORP		X	
SUSSEX IM INC		X	
TOOL & DYE	X*	X*	INSUFFICIENT INFORMATION TO PROVIDE RESULTS. NO EXACT HITS FOR "TOOL & DYE"
W.W. GRAINGER INC		X	
WILMINGTON TRUST N.A.	X		
XIAMEN RIKEN INDUSTRIAL CO LTD	X*		RIKEN
XPO	X*		XPO LOGISTICS SUPPLY CHAIN INC

* 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.