

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

)	Chapter 11
In re:)	
)	Case No. 19-10702 (MFW)
SOUTHCROSS ENERGY PARTNERS, L.P.,)	
<i>et al.</i> ,)	Jointly Administered
)	
Reorganized Debtors. ¹)	
)	Hearing Date: May 4, 2020 at 10:30 a.m. (ET)
)	Response Deadline: Apr. 17, 2020 at 4:00 p.m. (ET)
)	

**REORGANIZED DEBTORS’ FIRST OMNIBUS
OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS
PURSUANT TO 11 U.S.C § 502, FED. R. BANKR. P. 3007 AND DEL. L.R. 3007-1
(LATE FILED, AMENDED, DUPLICATE CLAIMS)**

* * *

TO THE CLAIMANTS LISTED IN EXHIBIT 1, EXHIBIT 2, AND EXHIBIT 3 ATTACHED TO THE PROPOSED ORDER (AS DEFINED HEREIN): YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE REORGANIZED DEBTORS. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE REORGANIZED DEBTORS’ RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS LISTED IN EXHIBIT 1, EXHIBIT 2, AND EXHIBIT 3 TO THE PROPOSED ORDER. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS IN EXHIBIT 1, EXHIBIT 2, AND/OR EXHIBIT 3 TO THE PROPOSED ORDER.

* * *

The above-captioned reorganized debtors (the “**Debtors**” or the “**Reorganized Debtors**,” as applicable) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”)² hereby file this *Reorganized Debtors’ First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Late Filed, Amended, Duplicate Claims)* (the “**Objection**”). This Objection is supported by the *Declaration of Erin*

¹ The reorganized debtors in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Southcross Energy Partners, L.P. (5230); Southcross Gulf Coast Transmission Ltd. (0546). The reorganized debtors’ mailing address is 1717 Main Street, Suite 5300, Dallas, TX 75201.

² As appropriate from the context, the terms Debtors, Reorganized Debtors, and Chapter 11 Cases shall include reference to Closing Debtors (as defined below) and their respective chapter 11 cases.



McKeighan in Support of the Debtors' First Omnibus Objection (Non-Substantive) to Certain Claims (Late Filed, Amended, Duplicate Claims) (the "**McKeighan Declaration**"), attached hereto as Exhibit B, and incorporated herein by reference. In further support of the Objection, the Reorganized Debtors respectfully state as follows:

Relief Requested

1. By this Objection, and pursuant to section 502 of title 11 of the United States Code (the "**Bankruptcy Code**"), rule 3007 of the Federal Rules of Bankruptcy Procedures (the "**Bankruptcy Rules**") and rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), the Reorganized Debtors seek entry of an order, substantially in the form attached hereto as Exhibit A (the "**Proposed Order**" and, if entered, the "**Order**"), disallowing each of the Claims identified on: (i) Exhibit 1 to the Proposed Order (the "**Late-Filed Claims**"), (ii) Exhibit 2 to the Proposed Order (the "**Amended Claims**"), and (iii) Exhibit 3 to the Proposed Order (the "**Duplicate Claim**").³

Jurisdiction and Venue

2. The United States Bankruptcy Court for the District of Delaware (the "**Court**") has jurisdiction over this Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012.

3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and, pursuant to Rule 9013-1(f) of the Local Rules, the Reorganized Debtors consent to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined

³ Each exhibit to the proposed order is incorporated herein by reference.

that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. Venue of the Chapter 11 Cases and related proceedings is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

A. General Background

5. On April 1, 2019 (the “**Petition Date**”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. Subsequent to the Petition Date, the Debtors continued in possession of their property and continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. No request has been made for the appointment of a trustee or examiner, and no official committee was appointed in the Chapter 11 Cases.

7. On January 24, 2020, the Debtors filed the *First Amended Chapter 11 Plan for Southcross Energy Partners L.P. and its affiliated Debtors* [D.I. 863] (as amended, the “**Plan**”). The Plan was confirmed on January 27, 2020 pursuant to the *Order Confirming First Amended Chapter 11 Plan for Southcross Energy Partners, L.P. and its Affiliated Debtors* [D.I. 873]. The Effective Date (as defined in the Plan) of the Plan occurred on January 31, 2020 [D.I. 881].

8. On March 6, 2020, the Court entered the *Final Decree (I) Closing Certain Chapter 11 Cases and (II) Terminating Certain Claims and Noticing Services* [D.I. 928] (the “**Final Decree**”), closing all but two of the Reorganized Debtors’ affiliated chapter 11 cases. Paragraph 6 of the Final Decree dictates that all Proofs of Claim against the Closing Debtors (each as defined therein) shall remain unaffected by entry of the Final Decree and such Proofs of

Claim shall be administered in the case of Debtor Southcross Energy Partners, L.P. without prejudice to the rights of any claimant related thereto.

9. Additional information about the Debtors' businesses and affairs, prepetition capital structure, and prepetition indebtedness, and the events leading up to the Petition Date, can be found in the *Declaration of Michael B. Howe in Support of Debtors' Chapter 11 Proceedings and First Day Pleadings* [D.I. 2], which is incorporated herein by reference.

10. The Chapter 11 Cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and the *Order Directing Joint Administration of Chapter 11 Cases* [D.I. 48] entered by the Court on April 2, 2019 in each of the Chapter 11 Cases.

B. Claims Resolution Process in the Chapter 11 Cases

11. On April 2, 2019, the Court entered the *Order Authorizing Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Notice and Claims Agent for Debtors Nunc Pro Tunc to the Petition Date* [D.I. 49] (the "**KCC Noticing and Claims Retention Order**"), thereby appointing Kurtzman Carson Consultants LLC ("**KCC**") as the claims and noticing agent for the Chapter 11 Cases. On June 10, 2019, the Court entered the *Order Authorizing The Debtors To Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor of the Debtors Nunc Pro Tunc to the Petition Date* [D.I. 258] (the "**KCC Administrative Advisor Retention Order**") and, together with the KCC Noticing and Claims Retention Order, the "**KCC Retention Orders**" and, KCC in its capacity under the KCC Retention Orders, the "**Claims Agent**"), thereby authorizing the Debtors to employ KCC as the administrative advisor to the Debtors in the Chapter 11 Cases.

12. On June 10, 2019, the Court entered the *Order Establishing Deadlines and Procedures for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof*

[D.I. 260] (the “**Bar Date Order**”) establishing July 19, 2019 at 5:00 p.m. (prevailing Eastern Time) and September 30, 2019 at 5:00 p.m. (prevailing Eastern Time) as the General Bar Date and Governmental Bar Date, respectively (each as defined therein, collectively, the “**Bar Date**”⁴). Furthermore, pursuant to Section 3.2 of the Plan, the bar date for Administrative Expense Claims (as defined therein) was March 1, 2020, and pursuant to Section 3.3 of the Plan, the bar date for Professional Fee Claims (as defined therein) was March 27, 2020.

13. On June 12, 2019, the Debtors prepared and filed their schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [D.I. 268–295, 297–322].

14. On June 13, 2019, KCC duly served the *Notice of Deadlines of Filing Proofs of Claim Against the Debtors* [D.I. 325] (the “**Bar Date Notice**”). See *Affidavit of Service of Priscilla Romera* [D.I. 343]. On June 21, 2019, the Debtors caused the Bar Date Notice to be published in the *USA Today*. See *Affidavit of Publication of Notice of Deadlines for Filing Proofs of Claim Against the Debtors in USA Today* [D.I. 341].

15. In the ordinary course of business, the Reorganized Debtors maintain books and records (the “**Book and Records**”) that reflect, among other things, the Reorganized Debtors’ liabilities and the amounts thereof owed to their creditors.

16. The Reorganized Debtors’ claims register (the “**Claims Register**”), prepared and maintained by KCC, reflects that approximately 650 proofs of claim (collectively, the “**Proofs of Claim**”) have been filed in the Chapter 11 Cases asserting claims against the Debtors (collectively, the “**Claims**”)⁵. The Reorganized Debtors and their advisors are comprehensively reviewing and reconciling all claims, including both the claims listed on the Schedules (the

⁴ The Governmental Bar Date (for the United States only) was extended to October 15, 2019 by order of the Court [D.I. 606].

⁵ On October 10, 2019, the Debtors filed the *Debtors’ Notice of Claims Satisfied in Full* [D.I. 518].

“**Scheduled Claims**”) and the Claims asserted in the Proofs of Claim (including any supporting documentation) filed in the Chapter 11 Cases. The Reorganized Debtors are also comparing the Claims asserted in the Proofs of Claims with the Reorganized Debtors’ Books and Records to determine the validity of the asserted Claims.

17. This reconciliation process includes identifying particular categories of Claims that the Reorganized Debtors believe should be disallowed. To avoid a possible double recovery or otherwise improper recovery by claimants, the Reorganized Debtors will continue to file omnibus objections to such categories of Claims if and where warranted. This Objection is one such omnibus objection.

Basis for Relief

18. Pursuant to section 101 of the Bankruptcy Code, a creditor holds a claim against a bankruptcy estate only to the extent that (a) it has a “right to payment” for the asserted liabilities and (b) the claim is otherwise allowable. 11 U.S.C. §§ 101(5) and 101(10).

19. When asserting a claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the *claimant*. *See In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992); *In re Int’l Match Corp.*, 69 F. 2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *In re Allegheny Int’l, Inc.*, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim’s *prima facie* validity. *Id.* In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim’s legal sufficiency. *Id.* at 173-74. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his

or her claim by a preponderance of the evidence. *Id.* at 174. The burden of persuasion is always on the claimant. *Id.*

A. Late-Filed Claims

20. The Reorganized Debtors object to the Late-Filed Claims listed on Exhibit 1 to the Proposed Order and request that the Late-Filed Claims be disallowed because they were filed after the applicable Bar Date. *See generally Berger v. Trans World Airlines, Inc. (In re Trans World Airlines, Inc.)*, 96 F.3d 687, 690 (3d Cir. 1996) (“The bar date means just that; it is a ‘drop-dead date’ that bars all prepetition claimants who received the required notice.”); *In re The Grand Union Company*, 204 B.R. 864, 871 (Bankr. D. Del. 1997) (“[T]he claim bar date operates as a federally created statute of limitations, after which the claimant loses all of her right to bring an action against the Debtor.”).

21. The Reorganized Debtors have reviewed the Claims Register and the Late-Filed Claims. Based on this review, the Reorganized Debtors have determined that the Late-Filed Claims were filed after the applicable Bar Date. Notwithstanding notice of the Bar Date as described above, the Claimants nonetheless failed to file the Late-Filed Claims in a timely manner and did not seek, much less obtain, leave of this Court to file their claims late.

22. Accordingly, the Late-Filed Claims should be disallowed.

B. Amended Claims

23. The Reorganized Debtors object to the Amended Claims listed on Exhibit 2 to the Proposed Order and request that the Amended Claims be disallowed. Based on the Reorganized Debtors’ review of the Claims Register and each of the Amended Claims, the Reorganized Debtors have determined that the Amended Claims have been amended or superseded by other Claims filed against the same Reorganized Debtor entity by or on behalf of the same claimants

relating to the same purported liabilities. If the Amended Claims identified on Exhibit 2 to the Proposed Order are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability. By this Objection, the Reorganized Debtors seek disallowance of each of the Amended Claims in order to limit each claimant to a single claim against the applicable Debtor's estate arising from the same alleged liability.

24. For each of the Amended Claims, the Reorganized Debtors have identified a surviving claim which asserts the same liability and is identified on Exhibit 2 to the Proposed Order in the column labeled "Surviving Claims." Unless objected to on other grounds in this Objection or otherwise by the Reorganized Debtors, such surviving claims will be unaffected by the relief requested in this Objection, and each of the Claimants' rights to assert these liabilities against the applicable Reorganized Debtor's estate will be preserved, subject to the Reorganized Debtors' reservations of their rights to object to such surviving claims and other claims on all grounds, whether legal, factual, procedure, substantive, or non-substantive.

25. Accordingly, the Amended Claims should be disallowed.

C. Duplicate Claim

26. The Reorganized Debtors object to the Claim identified on Exhibit 3 to the Proposed Order and respectfully request that the Duplicate Claim be disallowed in full. Based on the Reorganized Debtors' review of the Claims Register and the Duplicate Claim, the Reorganized Debtors have determined that the Duplicate Claim is redundant of another Claim filed against the same Reorganized Debtor entity by or on behalf of the same claimant relating to the same purported liability. If the Duplicate Claim is not disallowed, the claimant may obtain double recovery for the same alleged liability. By this Objection, the Reorganized Debtors seek

disallowance of the Duplicate Claim in order to limit each claimant to a single claim against the applicable estate arising from the same alleged liability.

27. For the Duplicate Claim, the Reorganized Debtors have identified a surviving claim which asserts the same liability and is identified on Exhibit 3 to the Proposed Order in the column labeled “Surviving Claim”. Unless objected to on other grounds in this Objection or otherwise by the Reorganized Debtors, each such surviving claim will be unaffected by the relief requested in this Objection, and the claimant’s rights to assert these liabilities against the applicable estate will be preserved, subject to the Reorganized Debtors’ reservations of their rights to object to such surviving claim on all grounds, whether legal, factual, procedural, substantive or non-substantive.

28. Accordingly, the Duplicate Claim should be disallowed in full.

Separate Contested Matters

29. Each of the Claims and the Objection with respect thereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Reorganized Debtors request that any order entered by this Court with respect to a request for disallowance herein shall be deemed a separate order with respect to each Claim.

Response to Omnibus Objections

30. To contest this Objection, a claimant must file and serve a written response to this Objection (a “**Response**”) so that it is received no later than the **deadline set forth above and in the accompanying notice** (the “**Response Deadline**”). Every Response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801, and served upon the following so that the Response is received no later than the Response Deadline at the following address:

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017
Attn: Steven Z. Szanzer and Donny Ariel

-and-

Morris, Nichols, Arsht & Tunnell LLP
1201 North Market Street, P.O. Box 1347
Wilmington, Delaware 19899-1347
Attn: Robert J. Dehney and Andrew R. Remming

Counsel to the Reorganized Debtors

31. Every Response to this Objection must contain, at a minimum, the following information:
- a. A caption setting forth the name of the Court, the name of the Debtor, the case number, and the title of the Objection to which the response is directed;
 - b. The name of the claimant, the claim number, and a description of the basis for the amount of the Claim;
 - c. The specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
 - d. Any supporting documentation, to the extent that it was not included in the Proof of Claim previously filed with the Clerk of the Court or the Claims Agent, upon which the claimant intends to rely to support the basis for and amounts asserted in the Proof of Claim; and
 - e. The Name, address, telephone number and fax number, if any, of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Reorganized Debtors should communicate with respect to the applicable Claim or the Objection and who possess authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.
32. If a claimant fails to file and serve a timely Response by the Response Deadline, the Reorganized Debtors may present to the Court an appropriate order disallowing the claim, without further notice or a hearing.

Adjournment of Hearing

33. The Reorganized Debtors reserve the right to seek an adjournment of the hearing on any Response to this Objection. In the event that the Reorganized Debtors seek such an adjournment, it will be noted on the notice of agenda for the hearing, and such agenda will be served on the affected claimant by serving the person designated in the Response.

Reservation of Rights

34. The Reorganized Debtors expressly reserve the right to amend, modify, or supplement this Objection. Should the grounds for objection stated in this Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Claims on any other grounds that the Reorganized Debtors discover or elect to pursue. The Reorganized Debtors reserve their right to assert substantive and/or one or more additional non-substantive objections to the Claims at a later time.

35. Notwithstanding anything contained in this Objection or the exhibits attached hereto, nothing herein shall be construed as a waiver of any rights that the Reorganized Debtors may have to (i) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but not limited to, sections 547 and 548 of the Bankruptcy Code, against the claimants subject to this Objection, (ii) enforce the Reorganized Debtors' rights of setoff against the claimants relating to such avoidance actions, or (iii) seek disallowance pursuant to section 502(d) of the Bankruptcy Code of claims of the claimants that are subject to such avoidance actions.

Notice

36. Notice of this Objection will be given to (i) the United States Trustee for the District of Delaware; (ii) each of the parties listed on Exhibit 1, Exhibit 2, and Exhibit 3 to the

Proposed Order; and (iii) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

No Prior Request

37. Neither the Debtors nor the Reorganized Debtors have previously sought the relief requested herein from the Court or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Reorganized Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: April 3, 2020
Wilmington, Delaware

Respectfully submitted,
MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Eric W. Moats

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Andrew R. Remming (No. 5120)
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-and-

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Counsel to the Reorganized Debtors

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

)	Chapter 11
In re:)	
)	Case No. 19-10702 (MFW)
SOUTHCROSS ENERGY PARTNERS, L.P.,)	
<i>et al.</i> ,)	Jointly Administered
)	
Reorganized Debtors. ¹)	
)	Hearing Date: May 4, 2020 at 10:30 a.m. (ET)
)	Response Deadline: Apr. 17, 2020 at 4:00 p.m. (ET)
)	

**NOTICE OF REORGANIZED DEBTORS’ FIRST OMNIBUS
OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS
PURSUANT TO 11 U.S.C § 502, FED. R. BANKR. P. 3007 AND DEL. L.R. 3007-1
(LATE FILED, AMENDED, DUPLICATE CLAIMS)**

PLEASE TAKE NOTICE that today, the above-captioned debtors and debtors-in-possession (the “Debtors”) filed the **Reorganized Debtors’ First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Late Filed, Amended, Duplicate Claims)** (the “Objection”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to approval of the relief sought in the Objection must be (a) in writing and served on or before **April 17, 2020 at 4:00 p.m. (ET)** (the “Response Deadline”); (b) filed with the Clerk of the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801; and (c) served as to be received on or before the response Deadline by the undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT only responses made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT, IF A RESPONSE IS RECEIVED BY THE RESPONSE DEADLINE, A HEARING ON THE RESPONSE WILL BE HELD, IF NECESSARY, ON **MAY 4, 2020 AT 10:30 A.M. (ET)** BEFORE THE HONORABLE MARY F. WALRATH, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM #4, WILMINGTON, DELAWARE 19801.

¹ The reorganized debtors in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Southcross Energy Partners, L.P. (5230); Southcross Gulf Coast Transmission Ltd. (0546). The reorganized debtors’ mailing address is 1717 Main Street, Suite 5300, Dallas, TX 75201.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 3, 2020
Wilmington, Delaware

Respectfully submitted,

MORRIS, NICHOLS ARSHT & TUNNELL LLP

/s/ Eric W. Moats

Robert J. Dehney (No. 3578)

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Counsel to the Reorganized Debtors

EXHIBIT A

Proposed Order

§ 157(b)(2); and due and proper notice of the Objection and opportunity for a hearing on the Objection having been given to the parties listed therein, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Objection; and the Court having the opportunity to hold a hearing on the Objection; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having found that the relief granted herein being in the best interests of the Reorganized Debtors, their creditors, and all other parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is hereby granted, as set forth herein.
2. The Late Filed Claims identified on Exhibit 1 hereto are hereby disallowed in full.
3. The Amended Claims identified on Exhibit 2 hereto are hereby disallowed in full.
4. The Duplicate Claim identified on Exhibit 3 hereto is hereby disallowed in full.
5. This Order shall be deemed a separate Order with respect to each of the Claims identified on Exhibit 1, Exhibit 2, and Exhibit 3. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
6. The Reorganized Debtors, Kurtzman Carson Consultants LLC, and the Clerk of this Court are authorized to take, or refrain from taking, any action necessary or appropriate to implement the terms of, and the relief granted in, this Order without seeking further order of the Court.

7. Notwithstanding any Bankruptcy Rule, Local Rule, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court shall retain jurisdiction to hear and determine all matters arising from, arising under, or related to the Chapter 11 Cases and the Plan, to the fullest extent permitted by law, including, without limitation, to enforce this Order.

Dated: _____, 2020
Wilmington, Delaware

THE HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Late-Filed Claims

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
 EXHIBIT 1
 LATE-FILED CLAIMS OBJECTION

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	HINDS COUNTY TAX COLLECTOR PO BOX 1727 JACKSON, MS 39215	12/16/2019	19-10706	Southcross Energy GP LLC	638	\$ 50,349.23*
2	JONES COUNTY TAX COLLECTOR PO BOX 511 LAUREL, MS 39441	12/27/2019	19-10715	Southcross Mississippi Pipeline, L.P.	639	\$ 75,706.54
					TOTAL	\$ 126,055.77*

* Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT 2

Amended Claims

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
1	ARANSAS COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Gathering Ltd. 19-10709	50	\$ 9,399.50*	ARANSAS COUNTY DIANE W. SANDERS PO BOX 17428 AUSTIN, TX 78760	11/12/19	Southcross CCNG Gathering Ltd. 19-10709	635	\$ 7,993.65*
2	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Gathering Ltd. 19-10709	46	\$ 295,064.59*	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross CCNG Gathering Ltd. 19-10709	593	\$ 296,347.85*
3	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	Southcross Gulf Coast Transmission Ltd. 19-10716	64	\$ 12,009.36*	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	609	\$ 10,080.34*
4	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	FL Rich Gas Services, LP 19-10723	68	\$ 2,473,934.53*	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	FL Rich Gas Services, LP 19-10723	603	\$ 2,499,858.13*
5	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	T2 EF Cogeneration LLC 19-10728	69	\$ 736,008.44*	BEE COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	T2 EF Cogeneration LLC 19-10728	610	\$ 765,647.37*
6	BEXAR COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/21/19	Southcross Energy Partners, L.P. 19-10702	77	\$ 1,485.34*	BEXAR COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/11/19	Southcross Energy Partners, L.P. 19-10702	614	\$ 1,590.94*
7	CALHOUN COUNTY APPRAISAL DISTRICT ET AL. MCCREARY, VESELKA, BRAGG & ALLEN, P.C. P.O. BOX 1269 ROUND ROCK, TX 78680- 1269	04/08/19	Southcross Energy Partners, L.P. 19-10702	1	\$ 844.86*	CALHOUN COUNTY APPRAISAL DISTRICT, ET AL MCCREARY, VESELKA, BRAGG & ALLEN, P.C. PO BOX 1269 ROUND ROCK, TX 78680- 1269	01/23/20	Southcross Energy Partners, L.P. 19-10702	640	\$ 336.85*
8	CALHOUN COUNTY APPRAISAL DISTRICT, ET AL MCCREARY, VESELKA, BRAGG & ALLEN, P.C. PO BOX 1269 ROUND ROCK, TX 78680- 1269	04/10/19	Southcross Energy Partners, L.P. 19-10702	5	\$ 2.76*	CALHOUN COUNTY APPRAISAL DISTRICT, ET AL MCCREARY, VESELKA, BRAGG & ALLEN, P.C. PO BOX 1269 ROUND ROCK, TX 78680- 1269	01/23/20	Southcross Energy Partners, L.P. 19-10702	640	\$ 336.85*

* Indicates claim contains unliquidated and/or undetermined amounts

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
9 COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	Southcross CCNG Gathering Ltd. 19-10709	19	\$ 218,867.00*	COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	Southcross CCNG Gathering Ltd. 19-10709	82	\$ 218,791.25*
10 COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services GP, LLC 19-10722	12	\$ 400,801.53*	COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	FL Rich Gas Services GP, LLC 19-10722	81	\$ 400,660.99*
11 DALLAS COUNTY LINEBARGER GOGGAN BLAIR & SAMPSON, LLP 2777 N. STEMMONS FREEWAY, SUITE1000 DALLAS, TX 75207	04/12/19	Southcross Energy Partners, L.P. 19-10702	7	\$ 71,876.90*	DALLAS COUNTY LINEBARGER GOGGAN BLAIR & SAMPSON, LLP 2777 N. STEMMONS FREEWAY, SUITE1000 DALLAS, TX 75207	09/17/19	Southcross Energy Partners, L.P. 19-10702	576	\$ 71,706.19*
12 DALLAS COUNTY LINEBARGER GOGGAN BLAIR & SAMPSON, LLP 2777 N. STEMMONS FREEWAY, SUITE1000 DALLAS, TX 75207	09/17/19	Southcross Energy Partners, L.P. 19-10702	576	\$ 71,706.19*	DALLAS COUNTY LINEBARGER GOGGAN BLAIR & SAMPSON, LLP 2777 N. STEMMONS FREEWAY, SUITE1000 DALLAS, TX 75207	10/16/19	Southcross Energy Partners, L.P. 19-10702	621	\$ 68,892.36*
13 DEPARTMENT OF THE TREASURY/ INTERNAL REVENUE SERVICE 1352 MARROWS ROAD, STE 204 NEWARK, DE 19711-5445	11/27/19	Southcross Energy Partners GP, LLC 19-10703	637	\$ 128,791.19*	THE DEPARTMENT OF THE TREASURY 1352 MARROWS ROAD, STE 204 NEWARK, DE 19711-5445	02/05/20	Southcross Energy Partners GP, LLC 19-10703	645	\$ 22,112.15*
14 DEWITT COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	58	\$ 16,563.99*	DEWITT COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	612	\$ 16,487.54*
15 DILLEY ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services, LP 19-10723	13	\$ 266,098.60*	DILLEY ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/16/19	FL Rich Gas Services, LP 19-10723	620	\$ 174,545.53*
16 DUVAL COUNTY DIANE W. SANDERS PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Transmission Ltd. 19-10710	40	\$ 75,890.96*	DUVAL COUNTY DIANE W. SANDERS PO BOX 17428 AUSTIN, TX 78760	11/12/19	Southcross CCNG Transmission Ltd. 19-10710	634	\$ 65,874.29*

* Indicates claim contains unliquidated and/or undetermined amounts

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
17 FORT BEND COUNTY PO BOX 3064 HOUSTON, TX 77253-3064	04/25/19	Southcross Gulf Coast Transmission Ltd. 19-10716	30	\$ 53,418.04*	FORT BEND COUNTY PO BOX 3064 HOUSTON, TX 77253-3064	10/22/19	Southcross Gulf Coast Transmission Ltd. 19-10716	628	\$ 54,891.05*
18 FREER ISD PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Transmission Ltd. 19-10710	54	\$ 21,987.82*	FREER ISD PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross CCNG Transmission Ltd. 19-10710	608	\$ 18,970.52*
19 FRIO HOSPITAL DISTRICT 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services, LP 19-10723	14	\$ 36,123.07*	FRIO HOSPITAL DISTRICT 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/16/19	FL Rich Gas Services, LP 19-10723	622	\$ 39,846.41*
20 GOLIAD COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	41	\$ 8,692.10*	GOLIAD COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	600	\$ 8,766.26*
21 GOLIAD ISD PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	48	\$ 12,692.29*	GOLIAD ISD PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	596	\$ 12,264.92*
22 HARRIS COUNTY, ET AL LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO BOX 3064 HOUSTON, TX 77253-3064	04/22/19	Southcross Energy GP LLC 19-10706	25	\$ 13,016.75*	HARRIS COUNTY, ET AL LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO BOX 3064 HOUSTON, TX 77253-3064	10/21/19	Southcross Energy GP LLC 19-10706	624	\$ 13,576.92*
23 JIM WELLS CAD PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Transmission Ltd. 19-10710	51	\$ 9,300.33*	JIM WELLS CAD PO BOX 17428 AUSTIN, TX 78760	11/12/19	Southcross CCNG Transmission Ltd. 19-10710	633	\$ 7,098.38*
24 KLEBERG COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	Southcross Energy GP LLC 19-10706	72	\$ 170.16*	KLEBERG COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Energy GP LLC 19-10706	597	\$ 419.95*
25 LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	Southcross CCNG Gathering Ltd. 19-10709	17	\$ 197,489.35*	LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	Southcross CCNG Gathering Ltd. 19-10709	80	\$ 86,751.30*

* Indicates claim contains unliquidated and/or undetermined amounts

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
26	LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	Southcross CCNG Gathering Ltd. 19-10709	80	\$ 86,751.30*	LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	11/14/19	Southcross CCNG Gathering Ltd. 19-10709	636	\$ 33,806.89*
27	LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services GP, LLC 19-10722	11	\$ 359,755.76*	LA SALLE COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	FL Rich Gas Services GP, LLC 19-10722	83	\$ 183,416.90*
28	LAVACA COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	44	\$ 3,192.01*	LAVACA COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	594	\$ 2,993.63*
29	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	Southcross CCNG Gathering Ltd. 19-10709	18	\$ 124,743.42*	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/15/19	Southcross CCNG Gathering Ltd. 19-10709	616	\$ 116,028.16*
30	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	Southcross CCNG Transmission Ltd. 19-10710	10	\$ 1,974.84*	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/15/19	Southcross CCNG Transmission Ltd. 19-10710	617	\$ 889.51*
31	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services, LP 19-10723	15	\$ 17,077.74*	MCMULLEN COUNTY 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/15/19	FL Rich Gas Services, LP 19-10723	618	\$ 17,158.70*
32	MISSISSIPPI DEPARTMENT OF REVENUE P.O. BOX 22808 JACKSON, MS 39225-2808	04/09/19	Southcross Midstream Services, L.P. 19-10713	4	\$ 421.43*	MISSISSIPPI DEPARTMENT OF REVENUE P.O. BOX 22808 JACKSON, MS 39225-2808	05/24/19	Southcross Midstream Services, L.P. 19-10713	78	\$ 884.64*
33	MISSISSIPPI DEPARTMENT OF REVENUE P.O. BOX 22808 JACKSON, MS 39225-2808	05/24/19	Southcross Midstream Services, L.P. 19-10713	78	\$ 884.64*	MISSISSIPPI DEPARTMENT OF REVENUE P.O. BOX 22808 JACKSON, MS 39225-2808	08/14/19	Southcross Midstream Services, L.P. 19-10713	547	\$ 0.00
34	MONTGOMERY COUNTY PO BOX 3064 HOUSTON, TX 77253- 3064	04/22/19	Southcross Energy Partners, L.P. 19-10702	23	\$ 4,894.40*	MONTGOMERY COUNTY PO BOX 3064 HOUSTON, TX 77253- 3064	10/21/19	Southcross Energy Partners, L.P. 19-10702	626	\$ 4,723.83*

* Indicates claim contains unliquidated and/or undetermined amounts

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
35 MONTGOMERY COUNTY PO BOX 3064 HOUSTON, TX 77253-3064	04/25/19	Southcross Gulf Coast Transmission Ltd. 19-10716	27	\$ 7,531.69*	MONTGOMERY COUNTY PO BOX 3064 HOUSTON, TX 77253-3064	10/21/19	Southcross Gulf Coast Transmission Ltd. 19-10716	627	\$ 7,231.61*
36 NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Energy GP LLC 19-10706	57	\$ 53,434.87*	NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross Energy GP LLC 19-10706	601	\$ 40,504.11*
37 NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Gathering Ltd. 19-10709	52	\$ 10,236.65*	NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross CCNG Gathering Ltd. 19-10709	602	\$ 8,482.30*
38 NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross CCNG Transmission Ltd. 19-10710	43	\$ 132,859.35*	NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross CCNG Transmission Ltd. 19-10710	591	\$ 89,604.62*
39 NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross NGL Pipeline Ltd. 19-10712	47	\$ 12,452.70*	NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross NGL Pipeline Ltd. 19-10712	599	\$ 9,034.34*
40 NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Nueces Pipelines LLC 19-10720	42	\$ 165,909.64*	NUECES COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross Nueces Pipelines LLC 19-10720	598	\$ 134,243.83*
41 PALACIOS ISD PO BOX 3064 HOUSTON, TX 77253-3064	04/22/19	Southcross Energy GP LLC 19-10706	24	\$ 82.29*	PALACIOS ISD PO BOX 3064 HOUSTON, TX 77253-3064	10/21/19	Southcross Energy GP LLC 19-10706	623	\$ 84.00*
42 PALACIOS ISD PO BOX 3064 HOUSTON, TX 77253-3064	04/25/19	Southcross Gulf Coast Transmission Ltd. 19-10716	28	\$ 330.96*	PALACIOS ISD PO BOX 3064 HOUSTON, TX 77253-3064	10/21/19	Southcross Gulf Coast Transmission Ltd. 19-10716	625	\$ 190.12*
43 PEARSALL ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	04/15/19	FL Rich Gas Services, LP 19-10723	16	\$ 52,750.32*	PEARSALL ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/16/19	FL Rich Gas Services, LP 19-10723	619	\$ 48,239.95*
44 SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gathering Ltd. 19-10708	56	\$ 56,198.15*	SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross Gathering Ltd. 19-10708	604	\$ 49,444.92*

* Indicates claim contains unliquidated and/or undetermined amounts

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 2
AMENDED CLAIMS OBJECTION

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT
45 SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	Southcross CCNG Gathering Ltd. 19-10709	61	\$ 79,328.02*	SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross CCNG Gathering Ltd. 19-10709	592	\$ 79,362.01*
46 SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	Southcross CCNG Transmission Ltd. 19-10710	63	\$ 37,816.40*	SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross CCNG Transmission Ltd. 19-10710	605	\$ 61,341.79*
47 SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	05/07/19	Southcross NGL Pipeline Ltd. 19-10712	62	\$ 66,136.49*	SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross NGL Pipeline Ltd. 19-10712	607	\$ 116,186.05*
48 SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Nueces Pipelines LLC 19-10720	59	\$ 28,197.21*	SAN PATRICIO COUNTY PO BOX 17428 AUSTIN, TX 78760	10/08/19	Southcross Nueces Pipelines LLC 19-10720	606	\$ 39,429.79*
49 VICTORIA COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Energy GP LLC 19-10706	39	\$ 55.00*	VICTORIA COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Energy GP LLC 19-10706	595	\$ 56.03*
50 VICTORIA COUNTY PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	60	\$ 61,016.79*	VICTORIA COUNTY PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	613	\$ 59,302.65*
51 WHARTON CO JR COLL DIST PO BOX 3064 HOUSTON, TX 77253- 3064	04/25/19	Southcross Gulf Coast Transmission Ltd. 19-10716	29	\$ 3,134.04*	WHARTON CO JR COLL DIST PO BOX 3064 HOUSTON, TX 77253- 3064	10/22/19	Southcross Gulf Coast Transmission Ltd. 19-10716	629	\$ 3,284.00*
52 YOAKUM ISD PO BOX 17428 AUSTIN, TX 78760	04/30/19	Southcross Gulf Coast Transmission Ltd. 19-10716	45	\$ 13,094.00*	YOAKUM ISD PO BOX 17428 AUSTIN, TX 78760	10/11/19	Southcross Gulf Coast Transmission Ltd. 19-10716	611	\$ 12,745.85*
Total				\$ 6,512,495.76*	Total				\$ 5,982,518.22*

* Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT 3

Duplicate Claim

SOUTHCROSS ENERGY PARTNERS, L.P., ET AL., CASE NO. 19-10702
EXHIBIT 3
DUPLICATE CLAIMS OBJECTION

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #/ ECF #	CLAIM AMOUNT	
1	COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	05/29/19	Southcross CCNG Gathering Ltd. 19-10709	82	\$ 218,791.25*	COTULLA ISD 711 NAVARRO STREET, STE 300 SAN ANTONIO, TX 78205	10/15/19	Southcross CCNG Gathering Ltd. 19-10709	615	\$ 85,789.02*	
Reason: Underlying liability asserted in claim to be disallowed appears to be included in the surviving claim. See paragraphs 26-28 of the Objection for further detail.											
Total					\$ 218,791.25*	Total					\$ 85,789.02*

* Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT B

McKeighan Declaration

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

)	Chapter 11
In re:)	
)	Case No. 19-10702 (MFW)
SOUTHCROSS ENERGY PARTNERS, L.P.,)	
<i>et al.</i> ,)	Jointly Administered
)	
Reorganized Debtors. ¹)	
)	
)	
)	

DECLARATION OF ERIN MCKEIGHAN IN SUPPORT OF REORGANIZED DEBTORS’ FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT TO 11 U.S.C § 502, FED. R. BANKR. P. 3007 AND DEL. L.R. 3007-1 (LATE FILED, AMENDED, DUPLICATE CLAIMS)

I, Erin McKeighan, declare as follows:

Background

1. I am a Managing Director of Alvarez & Marsal North America, LLC (“A&M”). A&M was retained by the above-captioned Reorganized Debtors² as restructuring advisor in connection with the Chapter 11 Cases. I have more than 13 years of restructuring experience..
2. I make this declaration in support of the *Reorganized Debtors’ First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Late Filed, Amended, Duplicate Claims)* (the “**Objection**”). If I were called upon to testify, I could and would testify to each of the facts set forth herein.
3. I am generally familiar with the Reorganized Debtors’ day-to-day operations,

¹ The reorganized debtors in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Southcross Energy Partners, L.P. (5230); Southcross Gulf Coast Transmission Ltd. (0546). The reorganized debtors’ mailing address is 1717 Main Street, Suite 5300, Dallas, TX 75201.

² Capitalized terms used but not defined herein have the meaning ascribed to them in the Objection.

financing arrangements, business affairs, and books and records that reflect, among other things, the Reorganized Debtors' liabilities, and the amount thereof owed to their creditors as of the Petition Date. I have read the Objection and corresponding Proposed Order, filed contemporaneously herewith.

4. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the claims, the Reorganized Debtors and other reviewing parties have reviewed the Reorganized Debtors' books and records, the relevant proofs of claim, as well as the supporting documentation provided by the claimants, and determined that the Late-Filed Claims, Amended Claims, and Duplicate Claims should be disallowed or otherwise treated as set forth in the Objection and Proposed Order. I believe the disallowance or treatment of the claims listed on Exhibit 1, Exhibit 2 and Exhibit 3 to the Proposed Order on the terms set forth in the Objection and Proposed Order is appropriate.

Late-Filed Claims

5. To the best of my knowledge, based on the Reorganized Debtors' review of the Claims Register and each Late-Filed Claim, the Late-Filed Claims listed on Exhibit 1 were filed after the applicable Bar Date. My understanding is that, accordingly, the Late-Filed Claims do not represent an obligation properly owed by the Reorganized Debtors and it is proper for the Court to enter the Proposed Order disallowing such claims as set forth therein and in the Objection.

Amended Claims

6. To the best of my knowledge, information, and belief, based on the Reorganized Debtors' review of the Claims Register and each of the Amended Claims, the Reorganized Debtors have determined that the Amended Claims listed on Exhibit 2 to the Proposed Order have been amended or superseded by other Claims filed against the same Reorganized Debtor

entity by or on behalf of the same claimants relating to the same purported liabilities. If the Amended Claims identified on Exhibit 2 to the Proposed Order are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability.

7. Furthermore, for each of the Amended Claims, the Reorganized Debtors have identified a surviving claim which asserts the same liability and is identified on Exhibit 2 to the Proposed Order in the column labeled “Surviving Claims.” Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing the Amended Claims as set forth therein and in the Objection.

Duplicate Claim

8. To the best of my knowledge, information, and belief, based on the Reorganized Debtors’ review of the Claims Register and the Duplicate Claim, the Reorganized Debtors have determined that the Duplicate Claim is redundant of another Claim filed against the same Reorganized Debtor entity by or on behalf of the same claimant relating to the same purported liability. If the Duplicate Claim is not disallowed, the claimant may obtain double recovery for the same alleged liability.

9. Furthermore, for the Duplicate Claim, the Reorganized Debtors have identified a surviving claim which asserts the same liability and is identified on Exhibit 3 to the Proposed Order in the column labeled “Surviving Claim”. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing the Amended Claims as set forth therein and in the Objection.

Compliance with Local Rule 3007-1

10. I have reviewed Local Rule 3007-1 and hereby state that, to the best of my knowledge and belief, this Objection is in compliance therewith.

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.

Executed: April 3, 2020

/s/ Erin McKeighan

Erin McKeighan

Managing Director,
Alvarez & Marsal North America, LLC