

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.	§	

**FIFTH 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 fifth supplemental declaration (this “**Fifth Supplemental Declaration**”) to supplement the disclosures contained in my (i) initial declaration, dated July 20, 2020 (the “**Initial Declaration**”), (ii) supplemental declaration, dated August 7, 2020 [Docket No. 328] (the “**Supplemental Declaration**”), (iii) second supplemental declaration, dated September 3, 2020 [Docket No. 726] (the “**Second Supplemental Declaration**”), (iv) third supplemental declaration, dated September 25, 2020 [Docket No. 984] (the “**Third Supplemental Declaration**”), and (v) fourth supplemental declaration, dated November 16, 2020 [Docket No. 1259] (the “**Fourth Supplemental Declaration**,” and together with the Initial Declaration, Supplemental Declaration, Second Supplemental Declaration, and Third Supplemental



Declaration, the “**Previous Declarations**”) 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> This Fifth Supplemental Declaration has been prepared in accordance with paragraph 14 of the Initial Declaration, which provides that Foley will supplement the disclosures in the Initial Declaration to the extent required if new relevant facts or relationships are discovered or arise during these Chapter 11 Cases.

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

#### **Foley’s Supplemental Conflicts Check**

4. Subsequent to the filing of the Previous Declarations, the Debtors and their advisors updated the Debtors’ parties in interest list to add certain other parties in interest to include Notice of Appearance Parties/Interested Parties. In accordance with the procedures described in the Application and in paragraph 14 of the Initial Declaration, Foley has reviewed the updated parties-in-interest list and conducted additional searches within its records to include the additional parties and other parties in interest identified on **Appendix 1** attached hereto.

5. Based on these additional searches, Foley hereby supplements its prior disclosures to disclose that Foley previously has represented, currently represents, and may represent in the future the entities (or their affiliates) set forth on **Appendix 2** attached hereto in matters unrelated to these Chapter 11 Cases. 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

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

**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 Previous Declarations, 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 Previous Declarations.

7. To the extent any information disclosed herein requires amendment, modification, or supplementation as additional relevant facts become available to Foley, a further supplemental declaration will be submitted to this Court reflecting such additional 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: November 30, 2020  
Milwaukee, Wisconsin

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

**Additional Parties**

**Notice of Appearance / Interested Parties**

ALLSTATE INSURANCE COMPANY  
CURTIS MACHINE COMPANY, INC.  
DANIEL G. HELMAN AND PAMELA HELMAN, THEIR SUCCESSORS AND/OR ASSIGNEES  
DAVIS TOOL & DIE CO., INC.  
FARMERS INSURANCE EXCHANGE  
FIRE INSURANCE EXCHANGE  
FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN  
GANNETT SATELITTE NETWORK LLC DBA USA TODAY NETWORK  
IRON MOUNTAIN INFORMATION MANAGEMENT, INC.  
JAMES TROY AND ELAINE TROY  
KO MANUFACTURING, INC.  
LIBERTY MUTUAL INSURANCE  
MID-CENTURY INSURANCE COMPANY  
NATIONWIDE INDEMNITY COMPANY AND EMPLOYERS INSURANCE OF WAUSAU  
OCEAN NETWORK EXPRESS (NORTH AMERICA) INC.  
ORACLE AMERICA, INC.  
SOUTHWORTH-MILTON, INC. D/B/A MILTON CAT  
THE COUNTY OF DENTON, TEXAS  
WILLIAM BUCHANAN AND EVA BUCHANAN

**Other Interested Parties**

CHARLES J. HANDLEY [LITIGATION CLAIMANT CIVIL ACTION 20-C-555(KAN), IN CIRCUIT COURT OF  
KANAWHA COUNTY, WV)  
CONSTELLATION NEWENERGY – GAS DIVISION, LLC  
CURTIS MACHINE  
DAVIS TOOL & DIE CO.  
ELGIN FASTENER /LELAND  
EQUINITI TRUST COMPANY  
FACEBOOK  
INFOR (US), INC.  
LIVINGSTON INTERNATIONAL INC.  
METROPOWER, INC.  
NEFF EXPANSION PA, LLC  
NIKKI AMERICA FUEL SYSTEMS  
OCEAN NETWORK EXPRESS (NORTH AMERICA) INC.  
OUTFITTERS, LLC  
SCHUMACHER BROTHERS FENCING, L.L.C  
SMARTEQUIP

SOUTHWORTH-MILTON, INC. (MILTON CAT)  
STANT USA CORP.  
UNITED PARCEL SERVICE  
WALBRO LLC / WALBRO ENGINE MANAGEMENT

**Appendix 2**

**Supplemental List of Connections**

<b>Entity Name</b>	<b>Current Foley Client</b>	<b>Former Foley Client</b>	<b>Name of Entity or Affiliated Entity that is/was a Foley Client</b>
ALLSTATE INSURANCE COMPANY	X*	X	Answer Financial, Inc. Allstate Life Insurance Company
CONSTELLATION NEWENERGY – GAS DIVISION, LLC	X*	X	Exelon Corporation Constellation NewEnergy, Inc.
FACEBOOK	X		
FARMERS INSURANCE EXCHANGE		X	
FIRE INSURANCE EXCHANGE		X	
FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN		X	
GANNETT SATELLITE NETWORK LLC DBA USA TODAY NETWORK	X*	X	Current: Gannett Company, Inc. Cars.com
INFOR (US), INC.		X*	Infor Global Solutions
IRON MOUNTAIN INFORMATION MANAGEMENT, INC.	X*	X	Iron Mountain Information Management, LLC
LIBERTY MUTUAL INSURANCE	X		
MID-CENTURY INSURANCE COMPANY		X	
NATIONWIDE INDEMNITY COMPANY AND EMPLOYERS INSURANCE OF WAUSAU		X*	EMPLOYERS INSURANCE OF WAUSAU
NEFF EXPANSION PA, LLC		X*	NEFF, LLC
ORACLE AMERICA, INC.		X*	Peoplesoft, Inc. Sun Microsystems Computer Company Sun Microsystems, Inc. Oracle Corporation
DENTON, TEXAS, COUNTY OF	X*	X	Denton County MUD No. 4 Denton County MUD No. 5

\* 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.

<b>Entity Name</b>	<b>Current Foley Client</b>	<b>Former Foley Client</b>	<b>Name of Entity or Affiliated Entity that is/was a Foley Client</b>
UNITED PARCEL SERVICE	X*	X	UPS Capital Coyote Logistics LLC
WALBRO LLC / WALBRO ENGINE MANAGEMENT	X		