UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
SHANNON WIND, LLC,	Case No. 26-90124 (ARP)
Debtor.[1]	(Emergency Hearing Requested)

DEBTOR'S EMERGENCY MOTION FOR AN ORDER (I) APPROVING NOTICE PROCEDURES FOR LITIGATION CLAIMANTS; AND (II) APPROVING FORM AND NOTICE OF COMMENCEMENT OF THIS CASE

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN 3:00 P.M. (PREVAILING CENTRAL TIME) ON JANUARY 28, 2026.

IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST APPEAR AT THE HEARING IF ONE IS SET, OR FILE A WRITTEN RESPONSE PRIOR TO THE DATE THAT RELIEF IS REQUESTED IN THE PRECEDING PARAGRAPH. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JANUARY 28, 2026, AT 3:00 P.M. (PREVAILING CENTRAL TIME) IN COURTROOM 400, 4TH FLOOR, 515 RUSK STREET, HOUSTON, TEXAS 77002. PARTICIPATION AT THE HEARING WILL ONLY BE PERMITTED BY AN AUDIO AND VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE PÉREZ'S CONFERENCE ROOM NUMBER IS 282694. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE PÉREZ'S HOMEPAGE. CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE PÉREZ'S HOMEPAGE.

[1] The last four digits of the Debtor's federal tax identification number are 3562. For the purpose of this chapter 11 case, the Debtor's address is 1920 McKinney Ave, Suite 950, Dallas, TX, 75201. Additional information regarding the Debtor's case can be found on the website of the Debtor's proposed claims and noticing agent at https://www.veritaglobal.net/shannon.

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SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

Shannon Wind, LLC, as debtor and debtor in possession in the above-captioned chapter 11 case (the "**Debtor**"), respectfully represents as follows:

RELIEF REQUESTED

1. Pursuant to sections 105(a) and 107(c) of title 11 of the United States Code (the "**Bankruptcy Code**"), Rules 1007, 2002, 7004(b)(8), 9007 and 9014(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "**Local Rules**") and the Procedures for Complex Cases in the Southern District of Texas, effective October 18, 2023 (the "**Complex Case Procedures**"), the Debtor seeks entry of an order, substantially in the form attached hereto (the "**Proposed Order**"): (i) approving notice procedures for certain claimants asserting claims against the Debtor through filed lawsuits ("**Litigation Claimants**"); and (ii) approving the form and manner of notice of commencement of this case.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "**Court**") has jurisdiction over this matter under 28 U.S.C. § 1334 and the *Order of Reference to Bankruptcy Judges* from the United States District Court for the Southern District of Texas, entered May 24, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The Debtors confirm their consent, pursuant to Bankruptcy Rule 7008, to the Court's entry of a final order by the Court in connection with this Motion.

3. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. On January 25, 2026, (the "**Petition Date**") Shannon Wind, LLC commenced the above-styled voluntary case under chapter 11 of title 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this Chapter 11 Case.

5. Additional information regarding the Debtor's business and capital structure and the circumstances leading to the commencement of this Chapter 11 Case is set forth in the *Declaration of John Shepherd in Support of Debtor's Chapter 11 Petition and First Day Relief* (the "**First Day Declaration**"),[2] filed contemporaneously herewith and incorporated herein by reference.

PREPETITION LITIGATION

6. As of the Petition Date, the Debtor—like hundreds of other defendants including many other power companies—was named in lawsuits arising from the power outages that occurred during Winter Storm Uri in February 2021. The Debtor's bankruptcy counsel did not represent the Debtor in these cases, but based upon a review of summaries of filed complaints, there are over one hundred pending actions with hundreds of different named plaintiffs.

7. The Debtor disputes all pending litigation claims. Nonetheless, to ease the administrative burden on its estate, and to avoid potential confusion that may arise from serving hundreds of separate claimants represented by counsel, the Debtor submits it is necessary and appropriate to approve procedures for serving notice on the Litigation Claimants as set forth herein

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

and in the Proposed Order including, without limitation, authorizing the Debtor to give notice to the Litigation Claimants through the Claimant Firms (as those terms are defined herein).

BASIS FOR RELIEF REQUESTED

I. Notice Procedures for Litigation Claimants are Necessary and Appropriate.

8. The Court has discretion to tailor the form and manner of notice to the circumstances of the case. Pursuant to section 105(a) of the Bankruptcy Code, the Court may "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code]." 11 U.S.C. § 105(a). Bankruptcy Rule 2002(m) further provides, "[e]xcept as these rules provide otherwise, the court may designate the matters about which, the entity to whom, and the form and manner in which a notice must be sent." Fed. R. Bankr. P. 2002(m).

9. Moreover, Bankruptcy Rules 9007 and 9008 provide that the Court may designate the form, manner, and recipients of notice when not otherwise specified by the rules, or the manner of publication when notice must be published under the Bankruptcy Code or rules. Fed. R. Bankr. P. 9007 & 9008. Lastly, Rule 9013(b) provides that for all motions, "[t]he moving party shall serve the motion on the entities the court directs if these rules do not require service or specify the entities to be served." Fed. R. Bankr. P. 9013(b).

10. In general, for notice of legal proceedings to satisfy due process, it must be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Cent. Hanover Bank & Tr. Co*., 339 U.S. 306, 314 (1950) (describing notice required to satisfy due process).[3]

[3] Pursuant to Bankruptcy Rule 9014(b) and Local Rule 9013-1, service of pleadings in a contested matter is to be accomplished in the manner provided for by Bankruptcy Rule 7004. Pursuant to Bankruptcy Rule 7004(b)(8), "in addition to the methods authorized by Rule 4(e) . . . service may be made within the United States by first class mail postage prepaid" upon "any defendant . . . [by mailing] a copy of the summons and complaint . . . to

11. Bankruptcy courts have found that providing notice of bankruptcy case proceedings to the attorney representing a creditor in prepetition litigation provides adequate and appropriate notice to that creditor. *See, e.g.*, *Matter of Sam*, 894 F.2d 778, 779 (5th Cir. 1990) (due process requirements had been satisfied because creditor's attorney had actual knowledge of the bankruptcy proceedings); *Chanute Proc. Credit Assoc. v. Schicke (In re Schicke)*, 290 B.R. 792, 805-06 (B.A.P. 10th Cir. 2003) (holding that notice of chapter 7 proceedings to the attorney representing a judgment creditor in non-bankruptcy litigation was the best notice possible where the debtor did not know the creditor's contact information), aff'd, 97 F. App'x 249 (10th Cir. 2004); *Cablevision Sys. Corp. v. Malandra (In re Malandra)*, 206 B.R. 667, 676 (Bankr. E.D.N.Y. 1997) (holding that notice to the attorney representing a creditor in prepetition litigation relating to the creditor's claim constituted adequate notice to the creditor).

12. Providing notice of bankruptcy proceedings and deadlines directly to personal injury claimants, rather than to their attorneys, may arguably not constitute adequate notice of a bankruptcy proceeding. *See In re Grand Union Co*., 204 B.R. 864, 874-75 (Bankr. D. Del. 1997) (holding that providing notice of bar dates in a chapter 11 case directly to personal injury claimants where the debtor was aware the claimants were represented by counsel was not adequate to satisfy due process, and notice should have been provided to the claimants' attorneys); *accord United States v. Thomas*, 342 B.R. 758, 761 (S.D. Tex. 2005) ("Being in bankruptcy does not alter the responsibilities that generally apply to work through counsel.").

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an agent of such defendant authorized by appointment or by law to receive service of process . . . ." Fed. R. Bankr. P. 7004(b)(8). Rule 4(e)(2)(C) of the Federal Rules of Civil Procedure states that "an individual . . . may be served in a judicial district of the United States by . . . delivering a copy of [a summons and complaint] to an agent authorized by appointment or by law to receive service of process." Fed. R. Civ. P. 4(e)(2)(C). The Debtor respectfully submits that the procedures described herein are consistent with such rules and reasonably calculated to apprise Litigation Claimants of any notices, mailings, pleadings and communications, in a contested matter.

13. Additionally, pursuant to Bankruptcy Rule 9014(b) and Local Rule 9013-1, service of pleadings in a contested matter is to be accomplished in the manner provided for by Bankruptcy Rule 7004. Pursuant to Bankruptcy Rule 7004(b)(8), "in addition to the methods authorized by Rule 4(e) . . . service may be made within the United States by first class mail postage prepaid" upon "any defendant . . . [by mailing] a copy of the summons and complaint . . . to an agent of such defendant authorized by appointment or by law to receive service of process . . . ." Fed. R. Bankr. P. 7004(b)(8). Rule 4(e)(2)(C) of the Federal Rules of Civil Procedure states that "an individual . . . may be served in a judicial district of the United States by . . . delivering a copy of [a summons and complaint] to an agent authorized by appointment or by law to receive service of process." Fed. R. Civ. P. 4(e)(2)(C). pursuant to Federal Rule of Civil Procedure 5(b), as incorporated by Bankruptcy Rule 7005 for adversary proceedings "[i]f a party is represented by an attorney, service [of pleadings and other papers] must be made on the attorney, unless the court orders otherwise." Fed. R. Civ. P. 5(b). Thus, service on law firms that represent Litigation Claimants (collectively, the "**Claimant Firms**") as the authorized agents of the Litigation Claimants each represents is also supported by the procedural rules.

14. Not only is it reasonable for personal injury claimants to expect that any legal notices and pleadings relating to their claims would be sent to their attorneys of record, sending notice directly to the claimants may constitute a violation of applicable Rules of Professional Conduct by a debtor's attorney. *See Grand Union*, 204 B.R. at 873 (finding that sending a bar date notice directly to personal injury claimants, rather than their counsel, "violate[d] the spirit, if not the letter, of Rule 4.2 of the Model Rules of Professional Conduct").

15. The Debtor seeks authority to provide notice to the Litigation Claimants through the Claimant Firms and, thereby, avoid any violations of applicable Rules of Professional Conduct and any confusion that would likely arise from sending notices directly to the Litigation Claimants.

16. Further, due to the volume of the cases filed by the Claimant Firms, the Debtor cannot independently confirm the addresses for each Litigation Claimant. Noticing the Litigation Claimants through the Claimant Firms is not only more efficient, but likely more reliable than the Debtor's advisors attempting to research and determine addresses and provide direct notice to Litigation Claimants that already have engaged counsel for matters related to the Debtor.

17. Courts in this District and others have granted similar relief. *See, e.g., In re Barretts Minerals Inc*., No. 23-90794 (DRJ) (Bankr. S.D. Tex. Oct. 3, 2023) [Dkt. 70] (approving notice procedures, including sending required notices, mailings, and other communications related to the chapter 11 cases to known counsel of record for the claimants in lieu of sending such communications directly to claimants); *In re Aldrich Pump LLC*, No. 20-30608 (JCW) (Bankr. W.D.N.C. June 25, 2020) [Dkt. 112] (same); *In re DBMP LLC*, No. 20-30080 (JCW) (Bankr. W.D.N.C. Jan. 28, 2020) [Dkt. 63] (same); *In re Paddock Enters*., LLC, No. 20-10028 (LSS) (Bankr. D. Del. Feb. 11, 2020) [Dkt. 95] (same); *In re Imerys Talc Am*., Inc., No. 19-10289 (LSS) (Bankr. D. Del. Mar. 19, 2019) [Dkt. 248] (same).

18. Accordingly, the Debtor seeks Court approval of the following procedures (collectively, the "**Litigation Claimant Notice Procedures**"):

a. The Debtor may serve all notices and pleadings relating to the Chapter 11 Case, including, without limitation, pleadings in any contested matter, seeking relief against any Litigation Claimants, on the Litigation Claimants

in care of their counsel at such counsel's address, including, for the avoidance of doubt, counsel's e-mail address;

b. Except with respect to pro se Litigation Claimants as discussed below, the Debtor may list the names, addresses and other contact information, as applicable, of the Claimant Firms in any creditor or service lists, including the Creditor Matrix provided to the Court or filed in this case, in lieu of listing the contact information of individual Litigation Claimants.

c. For a Claimant Firm representing multiple Litigation Claimants, the Debtor may serve each document only a single time on such Claimant Firm on behalf of all of such counsel's clients; *provided* that any notice or other document relating specifically to one or more particular Litigation Claimants (rather than all Litigation Claimants represented by a Claimant Firm) shall clearly identify the parties to whom it relates.

d. To the extent the Debtor identifies a pro se Litigation Claimant, the Debtor shall serve all notices and pleadings relating to the Chapter 11 Case, including, without limitation, pleadings in any contested matter, including, without limitation, pleadings in any contested matter, seeking relief against the pro se Litigation Claimant, directly on such pro se Litigation Claimant.

19. The Debtor respectfully submits that the Litigation Claimant Notice Procedures are warranted under the facts and circumstances of this Chapter 11 Case and represent a fair and appropriate process to serve the Litigation Claimants with notices and pleadings. The Litigation Claimant Notice Procedures are reasonably calculated to apprise the Litigation Claimants of the relief sought by the Debtor in this Chapter 11 Case and afford the Litigation Claimants an

opportunity to be heard. For the foregoing reasons, the Debtor requests that the Court approve the Litigation Claimant Notice Procedures, as described above.

II. Form and Manner of the Notice of Commencement.

20. Contemporaneously herewith, the Debtor has filed an ex parte application seeking authority to employ Kurtzman Carson Consultants LLC dba Verita Global ("**Verita**") as, among other things, claims, noticing and solicitation agent in this Chapter 11 Case. One of Verita's responsibilities, if its appointment is approved, will be to serve a notice (the "**Commencement Notice**") of the commencement of the Chapter 11 Case and the initial meeting of creditors pursuant to section 341(a) of the Bankruptcy Code (the "**Section 341 Meeting**") in lieu of the standard notice in this jurisdiction. The Commencement Notice will be substantially in the form attached hereto as **Exhibit A**, subject to any revisions agreed upon by the Debtor and the U.S. Trustee.[4]

21. The Debtor proposes that Verita serve the Commencement Notice by regular mail, postage prepaid, on those entities entitled to receive such notice pursuant to Bankruptcy Rule 2002 and the Notice Procedures not later than five business days after the Debtor (a) receives written notice of the time and place of the Section 341 Meeting and (b) agrees on the final form and substance of the Commencement Notice with the U.S. Trustee. The Debtor also will post a copy of the Commencement Notice on the restructuring website maintained by Verita. The Debtor hereby requests that the Court approve the foregoing procedures as providing sufficient notice of the commencement of the Chapter 11 Case and the Section 341 Meeting.

[4] Complex Case Procedure F.14(b) provides "if a Claims Agent has been appointed, use a Court-approved modified version of the Official Form 309F1 (Notice of Chapter 11 Case) to reflect the procedures approved for the services provided by the Claims Agent." The form of Commencement Notice attached as **Exhibit A** is based on Official Bankruptcy Form 309F and is customized to the circumstances of the Chapter 11 Case. No bar date for the filing of proofs of claim in the Chapter 11 Case has been established. Accordingly, the Commencement Notice will not include a notice of the bar date.

EMERGENCY CONSIDERATION

22. Pursuant to Local Rule 9013-1, the Debtor respectfully requests emergency consideration of this Motion pursuant to Bankruptcy Rule 6003, which empowers a court to grant relief within the first 21 days after the commencement of a chapter 11 case "to the extent that relief is necessary to avoid immediate and irreparable harm." As set forth in this Motion, the Debtor seeks relief from procedural rules and requirements that pertain to matters of immediate significance or which involve deadlines sooner than 21 days after the Petition Date. In particular, the Debtor requires emergency relief in order to serve its Commencement Notice and other pleadings in this Chapter 11 Case on counsel for the Litigation Claimants and list the Claimant Firms on the Debtor's creditor matrix that has been, or will soon be, filed with the Court. Due to the fact that each of the foregoing requires action by the Debtor shortly after the Petition Date, the immediate entry of an order providing for the relief requested herein is necessary. Accordingly, the Debtor respectfully requests that the Court grant the relief requested in this Motion on an emergency basis.

NOTICE

23. Notice of this Motion has been or will be provided to: (a) counsel for the U.S. Trustee; (b) counsel for the United States District Attorney's Office for the Southern District of Texas; (c) those creditors holding the twenty largest unsecured claims against the Debtor's estate; (d) Claimant Firms; (e) counsel to Citigroup Energy Inc. and Citibank, N.A., Attn: Jennifer Hardy (JHardy2@willkie.com); (f) Lotus Infrastructure Partners; (g) Berkshire Hathaway Energy; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PREVIOUS REQUEST

24. No previous request for the relief sought herein has been made by the Debtor to this or any other court.

WHEREFORE, the Debtor respectfully requests that the Court: (i) enter an order substantially in the form submitted herewith, granting the relief requested herein; and (ii) grant such other and further relief to the Debtor as the Court may deem just and proper.

Houston, Texas
Dated: January 26, 2026

/s/ Jarrod B. Martin

BRADLEY ARANT BOULT CUMMINGS LLP
Jarrod B. Martin (TX Bar No. 24070221)
Michael K. Riordan (TX Bar No. 24070502)
600 Travis Street, Suite 5600
Houston, TX 77002
Telephone:(713) 576-0300
Facsimile: (713) 547-0301
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mriordan@bradley.com

-and-

James Bailey (TX Bar No. 24108289)
1819 Fifth Avenue N.
Birmingham, AL 35203
Telephone:(205) 521-8000
Facsimile: (205) 488-6913
Email: jbailey@bradley.com

Proposed Counsel to the Debtor and Debtor in Possession

CERTIFICATE OF ACCURACY

In accordance with Local Rule 9013-1(i), I hereby certify that the foregoing statements regarding the nature of the emergency with respect to the Debtor are true and accurate to the best of my knowledge.

/s/ *Jarrod B. Martin*
Jarrod B. Martin

CERTIFICATE OF SERVICE

I certify that on the date hereof, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Jarrod B. Martin*
Jarrod B. Martin

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
SHANNON WIND, LLC,	Case No. 26-90124 (ARP)
Debtor.[1]	

ORDER (I)APPROVING NOTICE PROCEDURES FOR LITIGATION CLAIMANTS; AND (II) APPROVING THE FORM AND MANNER OF NOTICE OF COMMENCEMENT OF THIS CASE

This matter coming before the Court on the Debtor's Emergency Motion for an Order: (I) Approving Certain Notice Procedures for Litigation Claimants; and (II) Approving the Form and Manner of Notice of Commencement of This Case (the "**Motion**")[2], filed by the debtor and debtor in possession in the above-captioned case (the "**Debtor**") pursuant to sections 105(a) and 107(c) of the Bankruptcy Code, Bankruptcy Rules 1007, 2002, 7004(b)(8), 9007 and 9014(b), Local Rule 9013-1 and the Complex Case Procedures; the Court having reviewed the Motion and the First Day Declaration, and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "**Hearing**"); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (d) notice of the Motion and the Hearing was sufficient under the circumstances, (e) the relief requested in the Motion is in the best interests of the Debtor's estate and parties in

[1] The last four digits of the Debtor's federal tax identification number are 3562. For the purpose of this chapter 11 case, the Debtor's address is 1920 McKinney Ave, Suite 950, Dallas, TX, 75201. Additional information regarding the Debtor's case can be found on the website of the Debtor's proposed claims and noticing agent at https://www.veritaglobal.net/shannon.

[2] Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

interest, (f) the Court may enter a final order consistent with Article III of the United States Constitution, and (g) the Litigation Claimant Notice Procedures (i) provide for adequate notice to Litigation Claimants, (ii) are reasonable and appropriate under the circumstances and (iii) are reasonably calculated, under all the circumstances, to apprise the Litigation Claimants of the noticed matters and afford them an opportunity to be heard thereon; and the Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. In accordance with section 105(a) of the Bankruptcy Code, Bankruptcy Rules 2002(m), 7004(b)(8), and 9014(b) and Local Rule 9013-1, the Debtor is authorized to serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings and complaints in any contested matters or otherwise, seeking relief that could directly impact Litigation Claimants' rights and obligations in this Chapter 11 Case on the Litigation Claimants in care of their counsel (including counsel of record in any litigation pending as of the Petition Date) (each a "**Claimant Firm**") at such counsel's address, including e-mail address. For a Claimant Firm representing multiple Litigation Claimants, the Debtor may serve each document only a single time on such Claimant Firm (at each relevant address) on behalf of all of such counsel's clients; provided that any notice or other document relating specifically to one or more particular Litigation Claimants (rather than all Litigation Claimants represented by a Claimant Firm) shall clearly identify the parties to whom it relates.

2. With respect to pro se Litigation Claimants, the Debtor shall serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings and complaints in any contested matter or otherwise, seeking relief

that could directly impact such Litigation Claimants' rights and obligations in this Chapter 11 Case directly on such pro se Litigation Claimant.

3. The Debtor is authorized to list the names, addresses and other contact information, as applicable, of the Claimant Firms in any creditor or service list, including the Creditor Matrix provided to the Court or filed on the docket, in lieu of listing the contact information of individual Litigation Claimants.

4. The Commencement Notice, substantially in the form attached to the Motion as **Exhibit A** along with such changes as are agreed upon by the Debtor and the U.S. Trustee, is hereby approved.

5. Verita is authorized and directed to serve the Commencement Notice, substantially in the form attached to the Motion as **Exhibit A**, subject to any revisions agreed upon by the Debtor and the U.S. Trustee, not later than five business days after the Debtor (a) receives written notice from the U.S. Trustee of the time and place of the Section 341 Meeting and (b) agrees on the form and substance of the Commencement Notice with the U.S. Trustee.

6. Verita shall serve the Commencement Notice by regular mail, postage prepaid, on those entities entitled to receive the Commencement Notice pursuant to Bankruptcy Rule 2002(a) and the Litigation Claimant Notice Procedures approved herein. The Debtor also will post a copy of the Commencement Notice on the restructuring website maintained by Verita at https://www.veritaglobal.net/shannon.

7. Service of the Commencement Notice in accordance with this Order is approved in all respects and is deemed sufficient notice to all parties in interest of the commencement of the Chapter 11 Case and the Section 341 Meeting under the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Complex Case Procedures.

8. Nothing in the Motion or this Order is intended to be or shall be construed as (a) an admission as to the validity of any claim against the Debtor; (b) a waiver of the Debtor's or any party in interest's rights to dispute the amount of, basis for, or validity of any claim or interest under applicable law or nonbankruptcy law; (c) a promise or requirement to pay any claim; (d) a waiver of the Debtor's or any other party in interest's rights under the Bankruptcy Code, or any other applicable law; (e) a request for or granting of approval for assumption of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code; or (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtor's estate.

9. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

10. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement or interpretation of this Order.

Dated: _____, 2026

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

[Commencement Notice]

Exhibit A

[Commencement Notice]

Information to identify the case:	
Debtor: Shannon Wind, LLC Name	EIN: 80-0963562
United States Bankruptcy Court for the Southern District of Texas	
Case Number: 26- _26-90124 (ARP)	Date case filed for chapter 11: January 25, 2026

Official Form 309F (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.uscourts.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name Shannon Wind, LLC	
2. All other names used in the last 8 years:	
3. Address: 1920 McKinney Ave, Suite 950 Dallas, TX 75201	
4. Debtor's attorney: Name and address	**BRADLEY ARANT BOULT CUMMINGS LLP** Jarrod B. Martin (TX Bar No. 24070221) Michael K. Riordan (TX Bar No. 24070502) 600 Travis Street, Suite 5600 Houston, Texas 77060 Telephone: (713) 576-0300 Facsimile: (713) 547-0301 Email: jbmartin@bradley.com mriordan@bradley.com

-and-

James Bailey (TX Bar No. 24108289)
1819 Fifth Avenue
Birmingham, AL 35203
Telephone: (205) 521-8000
Facsimile: (205) 488-6913
Email: jbailey@bradley.com

5. Bankruptcy Clerk's Office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at www.pacer.uscourts.gov.	**United States Courthouse** **515 Rusk Avenue** **Houston, Texas 77002**	**Hours Open: Monday - Friday** **8:00 AM - 5:00 PM** **Contact phone: 713-250-5500**
6. Meeting of Creditors The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	**_____, 2026, at _____ A.M./P.M.** **(prevailing Central Time)** The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Location:
7. Proof of claim deadline:	**Deadline for filing proof of claim:**	Not yet set. When a deadline is set, notice will be sent at a later time.

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.usourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

Your claim is designated as disputed, contingent or unliquidated;
You file a proof of claim in a different amount; or
You receive another notice.

If your claim is not scheduled or if your claim is designated as disputed, contingent, or unliquidated, you must file a proof of claimor you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at www.pacer.uscourts.gov

Secured creditors retain rights in their collateral regardless ofwhether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.	If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below. **Deadline for filing the complaint:** Not yet set. When a deadline is set, notice will be sent at a later time.
9. Creditors with a foreign address	If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.
10. Filing a Chapter 11 bankruptcy case	Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.
11. Discharge of debts	Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
SHANNON WIND, LLC,	Case No. 26-90124 (ARP)
Debtor.[1]	

ORDER (I)APPROVING NOTICE PROCEDURES FOR LITIGATION CLAIMANTS; AND (II) APPROVING THE FORM AND MANNER OF NOTICE OF COMMENCEMENT OF THIS CASE

This matter coming before the Court on the Debtor's Emergency Motion for an Order: (I) Approving Certain Notice Procedures for Litigation Claimants; and (II) Approving the Form and Manner of Notice of Commencement of This Case (the "**Motion**")[2], filed by the debtor and debtor in possession in the above-captioned case (the "**Debtor**") pursuant to sections 105(a) and 107(c) of the Bankruptcy Code, Bankruptcy Rules 1007, 2002, 7004(b)(8), 9007 and 9014(b), Local Rule 9013-1 and the Complex Case Procedures; the Court having reviewed the Motion and the First Day Declaration, and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "**Hearing**"); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (d) notice of the Motion and the Hearing was sufficient under the circumstances, (e) the relief requested in the Motion is in the best interests of the Debtor's estate and parties in

[1] The last four digits of the Debtor's federal tax identification number are 3562. For the purpose of this chapter 11 case, the Debtor's address is 1920 McKinney Ave, Suite 950, Dallas, TX, 75201. Additional information regarding the Debtor's case can be found on the website of the Debtor's proposed claims and noticing agent at https://www.veritaglobal.net/shannon.

[2] Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

interest, (f) the Court may enter a final order consistent with Article III of the United States Constitution, and (g) the Litigation Claimant Notice Procedures (i) provide for adequate notice to Litigation Claimants, (ii) are reasonable and appropriate under the circumstances and (iii) are reasonably calculated, under all the circumstances, to apprise the Litigation Claimants of the noticed matters and afford them an opportunity to be heard thereon; and the Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. In accordance with section 105(a) of the Bankruptcy Code, Bankruptcy Rules 2002(m), 7004(b)(8), and 9014(b) and Local Rule 9013-1, the Debtor is authorized to serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings and complaints in any contested matters or otherwise, seeking relief that could directly impact Litigation Claimants' rights and obligations in this Chapter 11 Case on the Litigation Claimants in care of their counsel (including counsel of record in any litigation pending as of the Petition Date) (each a "**Claimant Firm**") at such counsel's address, including e-mail address. For a Claimant Firm representing multiple Litigation Claimants, the Debtor may serve each document only a single time on such Claimant Firm (at each relevant address) on behalf of all of such counsel's clients; provided that any notice or other document relating specifically to one or more particular Litigation Claimants (rather than all Litigation Claimants represented by a Claimant Firm) shall clearly identify the parties to whom it relates.

2. With respect to pro se Litigation Claimants, the Debtor shall serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings and complaints in any contested matter or otherwise, seeking relief

that could directly impact such Litigation Claimants' rights and obligations in this Chapter 11 Case directly on such pro se Litigation Claimant.

3. The Debtor is authorized to list the names, addresses and other contact information, as applicable, of the Claimant Firms in any creditor or service list, including the Creditor Matrix provided to the Court or filed on the docket, in lieu of listing the contact information of individual Litigation Claimants.

4. The Commencement Notice, substantially in the form attached to the Motion as **Exhibit A** along with such changes as are agreed upon by the Debtor and the U.S. Trustee, is hereby approved.

5. Verita is authorized and directed to serve the Commencement Notice, substantially in the form attached to the Motion as **Exhibit A**, subject to any revisions agreed upon by the Debtor and the U.S. Trustee, not later than five business days after the Debtor (a) receives written notice from the U.S. Trustee of the time and place of the Section 341 Meeting and (b) agrees on the form and substance of the Commencement Notice with the U.S. Trustee.

6. Verita shall serve the Commencement Notice by regular mail, postage prepaid, on those entities entitled to receive the Commencement Notice pursuant to Bankruptcy Rule 2002(a) and the Litigation Claimant Notice Procedures approved herein. The Debtor also will post a copy of the Commencement Notice on the restructuring website maintained by Verita at https://www.veritaglobal.net/shannon.

7. Service of the Commencement Notice in accordance with this Order is approved in all respects and is deemed sufficient notice to all parties in interest of the commencement of the Chapter 11 Case and the Section 341 Meeting under the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Complex Case Procedures.

8. Nothing in the Motion or this Order is intended to be or shall be construed as (a) an admission as to the validity of any claim against the Debtor; (b) a waiver of the Debtor's or any party in interest's rights to dispute the amount of, basis for, or validity of any claim or interest under applicable law or nonbankruptcy law; (c) a promise or requirement to pay any claim; (d) a waiver of the Debtor's or any other party in interest's rights under the Bankruptcy Code, or any other applicable law; (e) a request for or granting of approval for assumption of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code; or (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtor's estate.

9. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

10. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement or interpretation of this Order.

Dated: _____, 2026

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ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE