IN THE 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]	

DECLARATION OF ADAM J. GORMAN WITH RESPECT TO THE TABULATION OF VOTES ON THE AMENDED COMBINED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN

I, Adam J. Gorman, depose and say under the penalty of perjury:

1. I am a Director of Corporate Restructuring Services, employed by Kurtzman Carson Consultants LLC, dba Verita Global ("**Verita**"), located at 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, California 90245. I am over the age of 18 and not a party to this action.

2. I submit this declaration (this "**Declaration**") regarding the solicitation and tabulation of Ballots cast on the *Amended Combined Disclosure Statement and Chapter 11 Plan* [Docket No. 141] (as has been and may further be revised, supplemented, modified, or amended from time to time, the "**Combined Disclosure Statement and Plan**"). Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

[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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3. The Court authorized Verita's retention as claims, noticing and solicitation agent to the Debtor on January 26, 2026 pursuant to the *Order Authorizing the Retention and Appointment of Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent* [Docket No. 6] (the "**Retention Order**"). The Retention Order authorizes Verita to assist the Debtor with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

4. On April 22, 2026, the Court entered the *Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation Procedures and Solicitation Packages, (III) Scheduling a Combined Hearing, (IV) Establishing Procedures for Objecting to the Plan, (V) Approving the Form, Manner, and Sufficiency of Notice of the Combined Hearing, and (VI) Granting Related Relief* [Docket No. 138] (the "**Procedures Order**")[2] establishing, among other things, certain solicitation and voting tabulation procedures. Verita adhered to the procedures outlined in the Procedures Order, the Combined Disclosure Statement and Plan, and Ballots distributed to parties entitled to vote on the Plan. I supervised the solicitation and tabulation performed by Verita's employees.

Service and Transmittal of Solicitation Packages and Related Information

5. Pursuant to the Procedures Order, on or before April 29, 2026, Verita caused the Solicitation Packages to be served on all known Holders of Claims and Interests in Classes 3, 4, 5 and 6 (collectively the "**Voting Classes**") entitled to vote as of April 24, 2026 (the "**Voting Record Date**"). In lieu of a Solicitation Package, all known Holders of Claims in Classes 1 and 2 (collectively, the "**Non-Voting Classes**") received the Combined Hearing Notice and Notice of

[2] Terms not otherwise defined herein shall have the same meanings ascribed to them in the Procedures Order.

Non-Voting Status and Third-Party Release Opt-Out Form. Furthermore, Verita caused the Combined Hearing Notice to be served on the creditor matrix and all other parties required to receive such notice pursuant to the Procedures Order. A certificate of service evidencing the foregoing was filed with the Court on May 14, 2026 [Docket No. 182] (the "**Solicitation Certificate of Service**").

6. Verita also served other notices and filings related to the Combined Disclosure Statement and Plan.

7. In particular, Verita caused the *Notice of Filing of Plan Supplement* [Docket No. 187] (the "**Plan Supplement**") to be served on all holders of Claims entitled to vote on the Plan. A certificate of service evidencing the foregoing was filed with the Court on May 20, 2026 [Docket No. 196] (the "**Plan Supplement Certificate of Service**").

8. Verita caused the *Notice of (A) Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned by the Debtor Pursuant to the Plan, (B) Cure Amounts, if Any, and (C) Related Procedures in Connection Therewith* [Docket No. 168] (the "**Plan Assumed Contracts List**") to be served on counterparties to Executory Contracts and Unexpired Leases to be assumed or assumed and assigned pursuant to Article XI of the Plan. A certificate of service evidencing the foregoing was filed with the Court on May 15, 2026 [Docket No. 183] (the "**Plan Assumed Contracts List Certificate of Service**").

9. Furthermore, Verita caused the *Supplemental Notice of (A) Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned by the Debtor Pursuant to the Plan, (B) Cure Amounts, If Any, and (C) Related Procedures in Connection Therewith* [Docket No. 190] (the "**Supplemental Plan Assumed Contracts List**") to be served on additional counterparties to Executory Contracts and Unexpired Leases to be assumed or assumed and

assigned pursuant to Article XI of the Plan. A certificate of service evidencing the foregoing was filed with the Court on May 28, 2026 [Docket No. 198] (the "**Supplemental Plan Assumed Contracts List Certificate of Service**").

10. On April 29, 2026, Verita posted links to the electronic versions of the Procedures Order, Combined Disclosure Statement and Plan, and Combined Hearing Notice on the public access website at https://www.veritaglobal.net/shannon.

11. The Combined Hearing Notice was published in the *Houston Chronicle* on April 29, 2026, *The New York Times* (National Edition) on April 29, 2026, as well as the *Wichita Falls Times Record News* on April 30, 2026. An affidavit evidencing the publication of the Combined Hearing Notice was filed with the Court on May 6, 2026 [Docket No. 159].

The Tabulation Process

12. The Procedures Order established April 24, 2026 as the Voting Record Date to determine which Holders of Claims and Interests were entitled to receive the Solicitation Package or the Notice of Non-Voting Status, as applicable. Pursuant to the Procedures Order, Holders of Claims in Classes 3, 4, 5, and 6 were entitled to vote to accept or reject the Plan. No other Classes were entitled to vote on the Plan.

13. In accordance with the Solicitation Procedures, Verita worked closely with the Debtor's advisors to identify the Holders of Claims and Interests in the Voting Classes entitled to vote as of the Voting Record Date, and to coordinate the distribution of Solicitation Packages to such Holders. A detailed description of Verita's distribution of Solicitation Packages is set forth in the Solicitation Certificate of Service.

14. In accordance with the Solicitation Procedures, Verita received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's

voting database, and processed. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures, (b) executed by the relevant Holder entitled to vote on the Plan (or such Holder's representative), (c) returned to Verita via an approved method of delivery set forth in the Solicitation Procedures unless the delivery method requirement was waived by the Debtor, and (d) received by Verita on or before the Voting Deadline (*i.e.*, 4:00 p.m., prevailing Central Time, on May 27, 2026 unless extended in writing by the Debtor), which was established by the Procedures Order.

15. The final tabulation of votes cast by timely and properly completed Ballots received by Verita is attached hereto as **Exhibit A**. The detailed Ballot reports on a consolidated basis for Class 3, 4 and 6 are attached hereto as **Exhibit A-1** through **Exhibit A-3**, respectively. A summary of the votes cast is set forth below as follows:

Class 3 Prepetition Secured Obligation Claims					
Voting Outcome: Accepted					
	Total Received	**Total Valid**	**Accepted**	**Rejected**	**Invalid**
Number of Votes	2	2	2	0	0
Vote Percentage	-		100%	0%	-
Amount	$117,576,793.30	$117,576,793.30	$117,576,793.30	$0.00	
Amount Percentage	-	-	100%	0%	-

Class 4 General Unsecured Claims					
Voting Outcome: Accepted					
	Total Received	**Total Valid**	**Accepted**	**Rejected**	**Invalid**
Number of Votes	5	3	3	0	2
Vote Percentage	-	-	100%	0%	-
Amount	$24,665.12	$24,663.12	$24,663.12	0	-
Amount Percentage	-	-	100%	0	-

Class 6 Existing Equity Interests					
Voting Outcome: Rejected					
	Total Received	**Total Valid**	**Accepted**	**Rejected**	**Invalid**
Number of Votes	1	0	0	0	1 (Abstained)

Vote Percentage	-	-	0.00%	0.00%	-
Amount		-	0.00	0.00	-
Amount Percentage	-	-	0.00%	0.00%	-

A report of late-filed Ballots that the Debtor deemed to accept is attached hereto as **Exhibit B**. The original Voting Deadline was extended from May 27, 2026 to May 29, 2026 for certain holders of Claims entitled to vote on the Plan, as authorized by the Procedures Order. Accordingly, Vertia tabulated all Ballots received on or before the extended Voting Deadline.

Ballots That Were Not Counted

16. A report of any Ballots excluded from the final tabulation, and the reasons for exclusion, is attached hereto as **Exhibit C**. These Ballots were not counted because the Ballots were subject to a Claim Objection.

Opt-Out Election

17. Verita also reviewed and documented which parties submitted a Ballot or Opt-Out Form and checked the box on such Ballot or Opt-Out Form to opt out of the Third-Party Release. Pursuant to the Procedures Order. A report of all parties who opted out of the Third-Party Release by checking the box is attached hereto as **Exhibit D**. For the avoidance of doubt, this Declaration does not certify the validity or enforceability of any opt-out elections received, including those reported on **Exhibit D**, but rather is providing these opt-out election results for reporting and informational purposes only.

18. In total, Verita caused 2 Solicitation Packages to be served on Holders of Prepetition Secured Obligation Claims (Class 3); 23 Solicitation Packages to be served on Holders of General Unsecured Claims (Class 4); 1 Solicitation Package to be served on Holders of Existing Equity Interests (Class 6); and 2 Opt-Out Forms to be served on Holders in Non-Voting Classes.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 1, 2026

Adam Gorman

Adam J. Gorman
Director
Verita Global

Exhibit A

Final Tabulation of Votes

Exhibit A
Ballot Tabulation Summary

Class	Ballots Not Tabulated	Members Voted	Members Accepted	Members Rejected	Members Abstained	% Members Accepted	% Members Rejected	Total Amount Voted	Total Amount Accepted	Total Amount Rejected	Amount % Accepted	Amount % Rejected
Class 3 - Prepetition Secured Obligations Claims	0	2	2	0	0	100%	0%	$117,576,793.30	$117,576,793.30	$0.00	100%	0%
Class 4 - General Unsecured Claims	2	3	3	0	0	100%	0%	$24,663.12	$24,663.12	$0.00	100%	0%
Class 5 - 510(b) Claims												
Class 6 - Existing Equity Interests	1	0	0	0	1	0	0	0	0	0	0	0

Exhibit A-1

Class 3 Ballot Report

Exhibit A-1
Class 3 Ballot Detail
(Prepetition Secured Obligations Claims)

Creditor Name	Date Received	Ballot No.	Voting Amount	Vote
Citibank, N.A.	05/21/2026	4	$44,083.30	Accept
Citigroup Energy Inc.	05/26/2026	6	$117,532,710.00	Accept

Exhibit A-2

Class 4 Ballot Report

Exhibit A-2
Class 4 Ballot Detail
(General Unsecured Claims)

Creditor Name	Date Received	Ballot No.	Voting Amount	Vote
CommTech LLC	05/06/2026	2	$10,608.63	Accept
Safety-Kleen Systems, Inc.	05/27/2026	7	$1,554.49	Accept

Exhibit A-3

Class 6 Ballot Report

Exhibit A-3
Class 6 Ballot Detail
(Existing Equity Interests)

Creditor Name	Date Filed	Ballot No.	Voting Amount	Vote
Shannon Wind Holdings, LLC	05/05/2026	3	1	Abstain

Exhibit B

Accepted Late Ballots Report

Exhibit B
Late Filed Ballots

Creditor Name	Date Received	Ballot No.	Voting Amount	Vote
Electric Power Systems International, Inc.	05/29/2026	1	$12,500.00	Accept

Exhibit C

Excluded Ballot Report

Exhibit C
Ballots Excluded from Tabulation

Creditor Name	Date Filed	Ballot No.	Voting Amount	Vote	Class	Reason Not Accepted
Laura Woodring, Individually and OBO David Woodrings Estate	05/27/2026	9	$1.00	Reject	Class 4 General Unsecured Claims	Subject of an Objection [Docket No. 180]
Plaintiffs Against Shannon Wind, LLC	05/27/2026	8	$1.00	Reject	Class 4 General Unsecured Claims	Subject of an Objection [Docket No. 181]

Exhibit D

Third-Party Release Out-Out Report

Exhibit D
Opt-Out Summary

Creditor Name	Date Received	Ballot No.	Voting Amount	Vote	Class	Opt Out of the Third-Party Release
Clay County Judge	05/22/2026	5	N/A	N/A	Class 2 Other Secured Claims	Yes
CommTech LLC	05/06/2026	2	$10,608.63	Accept	Class 4 General Unsecured Claims	Yes
Shannon Wind Holdings, LLC	05/05/2026	3	1.00	Abstain	Class 6 Existing Equity Interests	Yes