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]	

STIPULATION REGARDING WITHDRAWAL OF CLAIM NOS. 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, AND 19

Accordion Partners, LLC, as Plan Administrator (the "**Plan Administrator**") and The Travelers Indemnity Company, Southern Vanguard Insurance Company, National Union Fire Insurance Company of Pittsburgh, PA, Housing Enterprise Insurance Company, Inc., Housing Authority Property Insurance, A Mutual Company, Harco National Insurance Company, Acceptance Indemnity Insurance Company, Occidental Insurance Company, SafePort Insurance Company, Wilshire Insurance Company, and Transguard Insurance Company (collectively, "**Claimants**" and together with the Plan Administrator, the "**Parties**" and each, a "**Party**") by and through their respective undersigned counsel, hereby stipulate and agree as set forth below (this "**Stipulation and Agreed Order**") subject to the approval of the United States Bankruptcy Court for the Southern District of Texas (the "**Bankruptcy Court**").

[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 claims and noticing agent at https://www.veritaglobal.net/shannon (the "**Claims Agent Website**").

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RECITALS

WHEREAS, on January 25, 2026 (the "**Petition Date**"), Shannon Wind, LLC (the "**Debtor**") filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 case (the "**Chapter 11 Case**").

WHEREAS, between April 17 and 20, 2026, Claimants timely filed proofs of claim, docketed as Claim Nos. 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, and 19 (the "**Proofs of Claim**"), against the Debtor.

WHEREAS, on May 13, 2026, the Debtor filed objections to the Proofs of Claim, docketed as Docket Nos. 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, and 179 (the "**Objections**").

WHEREAS, on June 3, 2026, the Bankruptcy Court entered the *Order Approving the Disclosure Statement on a Final Basis and Confirming the Plan* [ECF No. 225]. The Debtor's confirmed plan (the "**Plan**") provides that, following the occurrence of the effective date (the "**Effective Date**"), the Plan Administrator oversees the wind down and dissolution of the Debtor, shall reconcile and resolve Claims, and distribute payments to holders of Allowed Claims in accordance with the Plan and the Liquidation Trust Agreement.[2]

WHEREAS, on July 28, 2026, the Debtor filed the *Notice of (I) Entry of Order Approving the Debtor's Amended Combined Disclosure Statement and Chapter 11 Plan on a Final Basis and Confirming the Plan and (II) Occurrence of the Effective Date Notice* [ECF No. 257], establishing July 27, 2026, as the Effective Date.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that:

[2] Unless otherwise defined, all capitalized terms have the meanings provided in the Plan or Confirmation Order, as applicable.

1. The Parties agree that the Proofs of Claim shall be deemed withdrawn effective immediately upon the Bankruptcy Court's approval of this Stipulation and Agreed Order.

2. The Claimants shall receive no payments under the Plan on account of the Proofs of Claim.

3. The hearing on the Objections scheduled for October 28, 2026 at 9:00 a.m. is cancelled.

4. Each Party shall bear its own fees and costs in preparing and prosecuting the Proofs of Claim, the Objections, this Stipulation and Agreed Order.

5. Kurtzman Carson Consultants, LLC (KCC) d/b/a Verita Global, as claims and noticing agent, is hereby authorized to update the claims register in this chapter 11 case to reflect this Stipulation and Agreed Order.

6. This Stipulation and Agreed Order shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersedes all prior agreements and understandings relating to the subject matter hereof; *provided, however,* that this Stipulation and Agreed Order does not modify or impair the terms of the Plan or Confirmation Order.

7. The undersigned who execute this Stipulation and Agreed Order by or on behalf of each respective Party represents and warrants that he or she has been duly authorized and empowered to execute and deliver this Stipulation and Agreed Order on behalf of such Party and that the respective Parties have full knowledge of, and have consented to, this Stipulation and Agreed Order. This Stipulation and Agreed Order may be executed in counterparts and by electronic signature, and each such counterpart together with the others shall constitute one and the same instrument.

8. This Stipulation and Agreed Order shall not be modified, altered, amended, or vacated without the written consent of all Parties hereto or by further order of the Bankruptcy Court.

9. Notwithstanding any provisions of the Federal Rules of Bankruptcy Procedure, this Stipulation and Agreed Order shall be immediately effective and enforceable upon its entry.

10. The Bankruptcy Court shall retain sole and exclusive jurisdiction over all matters related to this Stipulation and Agreed Order.

Dated: _____, 2026

_____
ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO BY:

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