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

In re:	:	Chapter 11
SUPERIOR ENERGY SERVICES, INC., *et al.*,[1]	:	Case No. 20-35812 (DRJ)
Reorganized Debtors.	:	(Jointly Administered)

STIPULATION REGARDING CLASS ACTION CLAIMS

WHEREAS, on December 7, 2020, (the "**Petition Date**") the above-captioned reorganized debtors (the "**Debtors**" or "**Reorganized Debtors**," as applicable) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code;

WHEREAS, on January 7, 2021 certain plaintiffs (the "**Class Action Plaintiffs**") in pending class action lawsuits filed the following claims (collectively, the "**Class Action Claims**") against debtor Superior Energy Services, Inc. (the "**Parent**") in unliquidated amounts:

- Claim No. 441 filed by Adrian Algeribiya, et al.,
- Claim No. 442 filed by Case Evans as Class Claimant,
- Claim No. 445 filed by Casey Evans,
- Claim No. 446 filed by Melvin Miller;
- Claim No. 447 filed by Randy Galindo,
- Claim No. 452 filed by Israel Marquez,

[1] The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Reorganized Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.

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WHEREAS, on January 19, 2021, the Court entered an order (the "**Confirmation Order**") [Docket No. 289] confirming the *First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and its Affiliate Debtors under Chapter 11 of the Bankruptcy Code* (as amended, modified, or supplemented, the "**Plan**");[2]

WHEREAS, on February 2, 2021, the Plan was substantially consummated, and the Effective Date occurred; [3]

WHEREAS, Article VIII.A.2 of the Plan authorizes the Reorganized Debtors to settle or compromise any Claim and to administer and adjust the Claims Register to reflect any such settlements or compromises without any further notice to or action, order, or approval of the Court; and

WHEREAS, the Class Action Plaintiffs the Reorganized Debtors have engaged in discussions and have reached an agreement on resolution of the Class Action Claims.

IT IS THEREFORE STIPULATED AND AGREED THAT,

1. The Class Action Plaintiffs hereby withdraw the Class Action Claims with prejudice.

2. Except as provided herein, nothing in this stipulation shall affect the Class Action Plaintiffs' rights with respect to the other Reorganized Debtors. To the extent that the Class Action Plaintiffs have claims against any of the Reorganized Debtors other than the Parent, such claims shall be afforded the treatment under Class 8 of the Plan.

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[2] Capitalized terms used but not defined herein have the meanings given to them in the Plan.

[3] *See Notice of Effective Date and Entry of Order Approving the Disclosure Statement and Confirming the First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and its Affiliate Debtors under Chapter 11 of the Bankruptcy Code* [Docket No. 317].

3. Except as expressly set forth herein, the Class Action Plaintiffs and the Reorganized Debtors retain all rights under the Plan and Confirmation Order. This stipulation is not an admission of liability, and shall not be treated as a determination of the merits of any claim or defense that was asserted or could be asserted by either party in this or any other proceeding or matter.

4. No other person or entity not a party to this stipulation shall be deemed a third-party beneficiary of any provision of this stipulation or shall otherwise be entitled to enforce any provision hereof.

[*Remainder of page intentionally left blank*]

STIPULATED AND AGREED TO BY:
September 23, 2021

/s/ Timothy A. ("Tad") Davidson II

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