

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

In re:	§	
	§	Chapter 11
TM36, LLC, <i>et al.</i>	§	
	§	Case No. 26-90386 (ARP)
Debtors. ¹	§	
	§	(Jointly Administered)
	§	

**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE
EMPLOYMENT AND RETENTION OF DYKEMA GOSSETT, PLLC
AS COUNSEL, EFFECTIVE AS OF APRIL 30, 2026**

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

The Official Committee of Unsecured Creditors (the “Committee”) of TM36, LLC, *et al.* (the “Debtors”) hereby submits this application (“Application”) for entry of an order (the “Proposed Order”), substantially in the form attached hereto as **Exhibit A**, authorizing the employment, retention, and compensation of Dykema Gossett, PLLC (“Dykema”) as counsel to

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification number, are TM36, LLC (5051), StopLoss Specialists, LLC (3801), StopLoss, LLC (8840), StopLoss Response Services, LLC (3350), and StopLoss Logistics, LLC (3569). The Debtors’ service address is: 716 S. Frio Street, Suite 110, San Antonio, TX 78207.

the Committee, effective as of April 30, 2026, pursuant to sections 327, 328, 330, and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Local Rules”). In support of this Application, the Committee submits the *Declaration of William Hotze in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Dykema Gossett, PLLC as Counsel, Effective as of April 30, 2026* (the “Hotze Declaration”), attached hereto as **Exhibit B** and is incorporated herein by reference. In further support of the Application, the Committee respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The relief requested is consistent with the U.S. Trustee Guidelines. The Committee confirms its consent to the entry of a final order with respect to this Application, if it is determined that the Court would lack Article III jurisdiction to enter such final order or judgment absent consent of the parties.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 327, 328(a), 330, and 1103(a) of the Bankruptcy Code. Relief is also proper pursuant to Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 and the *Procedures for Complex Cases in the Southern District of Texas* (the “Complex Case Procedures”).

BACKGROUND

4. On March 5, 2026 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in this Court. *See* ECF No. 1. On March 6, 2026, the Court ordered joint-administration of the Debtors’ respective cases, thereby creating these chapter 11 cases (the “Chapter 11 Cases”). *See* ECF No. 6.

5. The Debtors continue to manage and operate its businesses as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On April 24, 2026, pursuant to section 1102 of the Bankruptcy Code, the Office of the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee, consisting of the following members: (i) Garrett McKenzie; (ii) Five Star Labor Inc.; and, (iii) Warden Security Services. *See* ECF No. 101.

7. On April 30, 2026 (the “Retention Date”), the Committee, in connection with the exercise of its powers and the performance of the duties conferred upon it pursuant to section 1103 of the Bankruptcy Code, selected Dykema to serve as its counsel in connection with these Chapter 11 Cases, subject to Court approval.

RELIEF REQUESTED

8. By this Application, the Committee requests entry of the Proposed Order, attached hereto as **Exhibit A**, approving the employment and retention of Dykema, effective as of April 30, 2026, which is the date on which the Committee selected Dykema to serve as its counsel and the date that Dykema began rendering services to the Committee. Subject to the terms set forth herein, the Committee seeks to retain Dykema in accordance with Dykema’s normal hourly rates in effect when service are rendered and normal reimbursement policies subject to Local Rule 2016-1.

THE RETENTION OF DYKEMA IS WARRANTED

A. DYKEMA'S EXPERIENCE

9. The Committee selected Dykema because Dykema's attorneys possess extensive knowledge and considerable expertise in the fields of bankruptcy, insolvency, reorganizations, creditors' rights, debt restructuring and corporate reorganizations, among other qualifications. In addition, Dykema's attorneys possess substantial experience appearing before Courts in this District and are familiar with local practice and procedure.

10. Dykema comprises nearly 400 lawyers who practice in 14 offices throughout the United States. The attorneys in Dykema's Bankruptcy and Financial Restructuring group have played significant roles in a wide array of chapter 11 cases across the country, including acting as counsel for official committees of unsecured creditors in the following cases: *In re Razzoo's Inc.*, No. 25-90522 (Bankr. S.D. Tex. 2025); *In re Alliance Farm and Ranch, LLC*, No. 25-30155 (Bankr. S.D. Tex. 2025); *In re Ample, Inc.*, No. 25-90817 (Bankr. S.D. Tex. 2025); *In re Buddy Mac Holdings, LLC*, No. 25-34829 (Bankr. N.D. Tex. 2025); *In re Elite Equipment Leasing, LLC*, No. 25-10145 (Bankr. D. Mont. 2025); *In re Kalera, Inc.*, No. 23-90290 (Bankr. S.D. Tex. 2023); *In re Connect Transport, Inc.*, No. 16-33971-hdh7 (Bankr. N.D. Tex. 2016); *In re Dune Energy, Inc.*, No. 15-10336 (Bankr. W.D. Tex. 2015); *In Yellow Cab Affiliation, Inc.*, No. 15-9539 (Bankr. N.D. Ill. 2015); *In re Texas Rangers Baseball Partners*, No. 10-43400 (DML) (Bankr. N.D. Tex. 2010); *In re Gulf Fleet Holdings, Inc.*, No. 10-50713 (Bankr. W.D. La. 2010); *In re Deep Marine Holdings, Inc.*, No. 09-39313 (Bankr. S.D. Tex. 2009); *In re Encompass Services Corp.*, No. H-06-CV-0392 (Bankr. S.D. Tex. 2006); and *In re AgriBiotech, Inc.*, No. 00-10533 (Bankr. D. Nev. 2000). The cases listed above are a small sample of Dykema's experience representing official committees of unsecured creditors.

11. The Committee believes that Dykema is well qualified to serve as its counsel in this Case. Further, employment of Dykema, effective as of April 30, 2026, is warranted under the circumstances of these Chapter 11 Cases. Upon its selection, the Committee requested that Dykema commence work immediately on time-sensitive matters and devote substantial resources to this Case prior to the submission and approval of this Application. Among other things, Dykema was immediately required to address matters related to the Debtor's proposed debtor-in-possession lender and associated financing.

B. SERVICES TO BE PROVIDED

12. Dykema will, in connection with this Case and subject to this Court's orders, provide the following legal services, among others, to the Committee:

- a. advise the Committee with respect to its rights, duties, and powers in these Chapter 11 Cases;
- b. Participate in in-person and telephonic meetings of the Committee and subcommittees formed thereby, if any;
- c. assist and advise the Committee in its meetings and negotiations with the Trustee and other parties in interest regarding these Chapter 11 Cases;
- d. assist the Committee in analyzing claims asserted against, and interests in, the Debtors, and in negotiating with the holders of such claims and interest and bringing, or participating in, objections or estimation proceedings with respect to such claims and interests;
- e. assist the Committee in analyzing the Debtors' assets and liabilities, including in its review of the Debtors' Schedules of Assets and Liabilities, Statements of Financial Affairs, and other reports prepared by the Debtor, investigating the extent and validity of liens and participating in and reviewing any proposed transfer, sale, or disposition of the Debtors' assets, financing arrangements, and cash collateral stipulations or proceedings;
- f. assist the Committee in its investigation of the acts, conduct, assets, liabilities, management, and financial conditions of the Debtors, the Debtors' historic and ongoing operations of its business, and any other matters relevant to these Chapter 11 Cases;

- g. assist the Committee in its analysis of, and negotiations with the Debtors or any third party related to, financing, asset disposition transactions, and compromises of controversies, reviewing and determining the Debtors' rights and obligations under leases and executory contracts, and assisting, advising, and representing the Committee in any manner relevant to the assumption and rejection of executory contracts and unexpired leases;
- h. assist the Committee in its analysis of, and negotiations with, the Debtors or any third party related to, the formulation, confirmation, and implementation of a chapter 11 plan and all documentation related thereto (including the disclosure statement);
- i. assist, advise, and represent the Committee in understanding its powers and duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- j. assist and advise the Committee with respect to communications with the general creditor body regarding significant matters in these Chapter 11 Cases;
- k. respond to inquiries from individual creditors as to the status of, and developments in, these Chapter 11 Cases;
- l. represent the Committee at hearings and other proceedings before the Court and other courts or tribunals, as appropriate;
- m. review and analyze complaints, motions, applications, orders, and other pleadings filed with the Court, and advise the Committee with respect to formulating positions with respect, and filing responses, thereto;
- n. assist the Committee in its review and analysis of, and negotiations with the Debtors and their non-Debtor affiliates related to intercompany claims and transactions;
- o. review and analyze third-party analyses and reports prepared in connection with the Debtors' potential claims and causes of action, advise the Committee with respect to formulating positions thereon, and perform such other diligence and independent analysis as may be requested by the Committee;
- p. advise the Committee with respect to applicable federal and state regulatory issues, as such issues may arise in these Chapter 11 Cases;
- q. assist the Committee in preparing pleadings and applications, and pursuing or participating in adversary proceedings, contested matters, and administrative proceedings as may be necessary or appropriate in furtherance of the Committee's duties;
- r. take all necessary or appropriate actions as may be required in connection with the administration of the Debtors' estates, including with respect to a chapter 11 plan and related disclosure statement; and

- s. perform such other legal services as may be necessary or as may be requested by the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code.

13. Dykema will coordinate with all other estate professionals, including other appointed committees, if any, to avoid duplication of efforts.

C. DYKEMA'S RATES AND BILLING PRACTICES

14. The Committee requests that all legal fees and related costs and expenses incurred by the Committee on account of services rendered by Dykema in these Chapter 11 Cases be paid as administrative expense of the Debtor's estate pursuant to sections 328, 330(a), 331, 503(b), and 507(a) of the Bankruptcy Code. Subject to the Court's approval, Dykema will charge the Committee for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered.

15. Dykema intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any further orders of this Court for all services performed and expenses incurred since April 30, 2026.

16. The primary attorneys and paraprofessionals that will work on this representation and their respective discounted hourly rates for this matter are as follows:

Attorney	Position	Rate
William Hotze	Member	\$750
Michael Twomey	Member	\$715
Jennifer Cruz	Senior Counsel	\$625
Dominique Douglas	Associate	\$575
Sebastian Campos	Paralegal	\$350

17. Other attorneys and paraprofessionals may render services to the Committee as needed.

18. Pursuant to section 328(a) of the Bankruptcy Code, the Committee may retain Dykema on reasonable terms and conditions. The hourly rates set forth are the firm's standard hourly rates for work of this nature. The firm's standard rates are set at a level designed to compensate the firm fairly for work of its attorneys and paralegals and to cover fixed and routine overhead expenses.

19. Dykema has advised the Committee that the hourly rates set forth above are subject to annual increases in the normal course of Dykema's business. In the event of any such increase, Dykema will provide the U.S. Trustee and the Committee with written notice of any such increase and file a supplemental affidavit (a "Supplemental Affidavit") with the Court. Any Supplemental Affidavit will explain the basis for the requested rate increase in accordance with section 330(a)(3)(F) of the Bankruptcy Code. Pursuant to section B(2)(d) of the U.S. Trustee Guidelines, Dykema will provide justification of the reasonableness of any rate increase.

20. In addition, it is Dykema's policy to charge its clients in all areas of practice for all other expenses incurred related to the representation. The expenses charged to clients include, among other things, postage in excess of \$2.50 and express mail charges, special or hand delivery charges, internal photocopying charges, external photocopying charges at the actual cost charged, print charge for documents in excess of 10 pages at \$.20 per page, travel expenses, expenses for "working meals," and computerized research. Dykema does not charge for long distance calls other than hosted conference calls at vendor's rate. Dykema does not charge for incoming or outgoing telecopier services. Otherwise, Dykema will charge the Debtor for expenses in a manner and at rates consistent with charges made generally to Dykema's other clients and consistent with this Court's rules and the applicable U.S. Trustee Guidelines. Dykema has advised the Committee

that it will charge all costs and expenses in accordance, and only to the extent consistent, with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the U.S. Trustee Guidelines.

21. Dykema did not receive any retainer from the Debtors, the Trustee, the Committee, or any other entity in these Chapter 11 Cases. Other than as set forth herein, there is no proposed arrangement to compensate Dykema. Pursuant to Bankruptcy Rule 2016(b), Dykema has not shared or agreed to share (i) any compensation it has received or may receive with any other party or person, other than with the partners, counsels, associates, and contract attorneys associated with Dykema, or (ii) any compensation another person or party has received or may receive.

22. The Committee believes the compensation arrangements with Dykema are consistent with and typical of arrangements entered by Dykema and other law firms with respect to rendering similar services for clients such as the Committee.

23. Dykema's compliance with the requirements of Bankruptcy Code sections 327, 328, 330, and 504 and Bankruptcy Rule 2014 is further set forth in detail in the Hotze Declaration.

D. DYKEMA'S DISINTERESTEDNESS AND DISCLOSURE CONCERNING CONFLICTS OF INTEREST

24. Based upon the Hotze Declaration annexed hereto, the Committee is satisfied that (i) Dykema is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and represents no interest adverse to the Committee, the Debtors, their estates, or any other party in interest in the matters upon which it is to be engaged, (ii) Dykema has no connection with the U.S. Trustee or any other person employed in the office of the U.S. Trustee, except as otherwise disclosed in the Hotze Declaration, and (iii) Dykema has not been paid any retainer against which to bill fees and expenses. To the best of the Committee's knowledge, Dykema has no connection with creditors or any other party-in-interest except as otherwise noted in the Hotze Declaration.

25. As described in the Hotze Declaration, Dykema analyzed the list of interested persons and entities annexed to the Debtors' retention applications and ran the list of relevant parties in interest included on Schedule 1 to the Hotze Declaration through its conflicts system consistent with the U.S. Trustee's requirements. Dykema does not represent, or have any other connection with, any of the parties in interest listed on Schedule 1 to the Hotze Declaration, except as set forth in the Hotze Declaration. While employed by the Committee, Dykema will not represent any entity having an adverse interest to the Committee in connection with these Cases.

26. Dykema's conflict search resulted in the disclosures set forth on Schedule 2 to the Hotze Declaration. The Committee is aware that Dykema currently represents or has previously represented certain interested parties in matters wholly unrelated to Case, as further identified in the Hotze Declaration and listed on Schedule 2 thereto.

27. Dykema does not and will not represent any such interested parties in any matter related to the Debtors or the Trustee. The Committee and Dykema believe that neither a potential nor an actual conflict of interest exists regarding Dykema's representation of the Committee as a result of the foregoing connections. The foregoing connections, however, are disclosed to provide the Court and other parties in interest an opportunity to make their own independent determination. If any such potential conflicts arise and if ethical or business considerations advise against Dykema undertaking such representation, then separate counsel will handle those matters.

28. Except as described above and in the Hotze Declaration, Dykema is not aware of any other connections with the Debtors, the Trustee, creditors, any other parties in interest, their respective attorneys and accountant, the United States Trustee, or any person employed in the Office of the United States Trustee. Should Dykema identify any other connections in the future,

the Committee and Dykema will supplement this Application and the Hotze Declaration as appropriate.

NOTICE AND NO PRIOR REQUEST

29. Notice of this Application is being served pursuant to Local Rule 9003-1. The Committee respectfully submits that no further notice of this Application is required.

30. No prior application for the relief requested herein has been made to this or any other court.

WHEREFORE, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (i) authorizing the Committee to retain and employ Dykema, effective as of April 30, 2026 , and (ii) granting such other and further relief as may be just and proper under the circumstances.

Dated: June 1, 2026

Respectfully submitted,

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF TM36, LLC, *et al.***

By: /s/ April S. Hughes
April S. Hughes
As Chairman

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this June 1, 2026, the foregoing *Application* was filed with the Court and served (i) via the Court's CM/ECF system to all of the parties registered to receive such notice and (ii) pursuant to Local Rule 9003-1.

/s/ William Hotze
William Hotze

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

In re:	§	
TM36, LLC, <i>et al.</i>	§	Chapter 11
Debtors. ¹	§	Case No. 26-90386 (ARP)
	§	(Jointly Administered)
	§	

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
DYKEMA GOSSETT, PLLC AS ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF APRIL 30, 2026**

This matter is before the Court upon the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Dykema Gossett, PLLC as Counsel, Effective as of April 30, 2026* (the “Application”), filed by the Official Committee of Unsecured Creditors (the “Committee”) on June 1, 2026, pursuant to sections 327, 328, and 1103 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas (the “Local Rules”). In the Application, the Committee seeks authority to retain and employ Dykema Gossett, PLLC (“Dykema”) as its attorneys, effective as of April 30, 2026. Upon the representation that, while employed by the Committee, Dykema does not represent any other entity having an adverse interest in connection with these chapter 11 Cases in accordance with section 1103(b) of the Bankruptcy Code, and that Dykema has disclosed any connections with parties set forth in Rule 2014 of the Bankruptcy Rules; and it appearing that relief requested in the Application is in the

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification number, are TM36, LLC (5051), StopLoss Specialists, LLC (3801), StopLoss, LLC (8840), StopLoss Response Services, LLC (3350), and StopLoss Logistics, LLC (3569). The Debtors’ service address is: 716 S. Frio Street, Suite 110, San Antonio, TX 78207.

best interest of the Committee and the Debtors' estates, and the Court having jurisdiction to consider the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b), and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409, and having reviewed the Application and the accompanying *Declaration of William Hotze in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Dykema Gossett, PLLC as Counsel, Effective as of April 30, 2026*, the Court finds and determines that Dykema does not represent any other entity having an adverse interest in connection with these Chapter 11 Cases in accordance with section 1103(b) of the Bankruptcy Code. Due and proper notice of the Application having been provided, and it appearing that no other or further notice is necessary or required, and the Court having reviewed the Application and having determine that the legal and factual bases set forth in the Application establish just cause for the relief granted herein, and upon all of the proceedings had before the Court, and after due deliberation and sufficient cause appearing thereof, it is **HEREBY ORDERED THAT:**

1. The Application is **GRANTED**, as set forth herein.
2. Pursuant to section 328 and 1103(a) of the Bankruptcy Code, Rules 2014 and 2016 of the Bankruptcy Rules, and Rules 2014-1 and 2016-1 of the Local Rules, the Committee is authorized to employ and retain Dykema as its counsel in this chapter 11 Case, with such employment being effective April 30, 2026.
3. Dykema is authorized to render professional services to the Committee in connection with these Chapter 11 Cases, as described in the Application.
4. Dykema shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in accordance with

applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any other applicable procedures and orders of this Court.

5. Notice of the Application as provided therein shall be deemed good and sufficient notice of such Application and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

6. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Signed: _____, 2026

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

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

In re:	§	
TM36, LLC, <i>et al.</i>	§	Chapter 11
Debtors. ¹	§	Case No. 26-90386 (ARP)
	§	(Jointly Administered)
	§	

**DECLARATION OF WILLIAM HOTZE IN SUPPORT OF APPLICATION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF DYKEMA
GOSSETT, PLLC AS COUNSEL, EFFECTIVE AS OF APRIL 30, 2026**

I, William Hotze, do state and declare as follows:

1. I am over the age of 21, of sound mind, and am competent to testify to all the matters set forth below. I submit this declaration (the “Declaration”) in support of the *Declaration of William Hotze in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Dykema Gossett, PLLC as Counsel, Effective as of April 30, 2026* (the “Application”), filed contemporaneously herewith.² The matters stated in this Declaration are within my personal knowledge. If I were called as a witness, I could and would testify competently to the factual statements set forth herein. To the extent that information disclosed herein requires supplementation, amendment, or modification upon Dykema’s completion of further analysis or as additional information become available to it, a supplemental declaration will be filed with the Court.

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification number, are TM36, LLC (5051), StopLoss Specialists, LLC (3801), StopLoss, LLC (8840), StopLoss Response Services, LLC (3350), and StopLoss Logistics, LLC (3569). The Debtors’ service address is: 716 S. Frio Street, Suite 110, San Antonio, TX 78207.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

2. I am an attorney licensed to practice law in the State of Texas and have been a member in good standing of the Texas Bar since 2013. I am also admitted to practice before the United States District and Bankruptcy Courts for the Western, Southern, Eastern and Northern Districts of Texas.

3. I am member of the law firm of Dykema Gossett PLLC (the “Firm” or “Dykema”). My office address is 5 Houston Center, 1401 McKinney Street, Suite 1625, Houston, TX 77010, telephone: (713) 904-6900, and e-mail: whotze@dykema.com. My State Bar Number is 24087754.

4. On April 30, 2026, the Committee retained Dykema as its counsel, subject to Court approval. Dykema began rendering services to the Committee immediately following its selection by the Committee.

5. Dykema comprises nearly 400 lawyers who practice in 14 offices throughout the United States. The attorneys in Dykema’s Bankruptcy and Financial Restructuring group have played significant roles in a wide array of chapter 11 cases across the country, including acting as counsel for official committees of unsecured creditors in the following cases: *In re Razzoo’s Inc.*, No. 25-90522 (Bankr. S.D. Tex. 2025); *In re Alliance Farm and Ranch, LLC*, No. 25-30155 (Bankr. S.D. Tex. 2025); *In re Ample, Inc.*, No. 25-90817 (Bankr. S.D. Tex. 2025); *In re Buddy Mac Holdings, LLC*, No. 25-34829 (Bankr. N.D. Tex. 2025); *In re Elite Equipment Leasing, LLC*, No. 25-10145 (Bankr. D. Mont. 2025); *In re Kalera, Inc.*, No. 23-90290 (Bankr. S.D. Tex. 2023); *In re Connect Transport, Inc.*, No. 16-33971-hdh7 (Bankr. N.D. Tex. 2016); *In re Dune Energy, Inc.*, No. 15-10336 (Bankr. W.D. Tex. 2015); *In Yellow Cab Affiliation, Inc.*, No. 15-9539 (Bankr. N.D. Ill. 2015); *In re Texas Rangers Baseball Partners*, No. 10-43400 (DML) (Bankr. N.D. Tex. 2010); *In re Gulf Fleet Holdings, Inc.*, No. 10-50713 (Bankr. W.D. La. 2010); *In re Deep Marine*

Holdings, Inc., No. 09-39313 (Bankr. S.D. Tex. 2009); *In re Encompass Services Corp.*, No. H-06-CV-0392 (Bankr. S.D. Tex. 2006); and *In re AgriBiotech, Inc.*, No. 00-10533 (Bankr. D. Nev. 2000). The cases listed above are a small sample of Dykema's experience representing official committees of unsecured creditors.

6. I make this declaration in support of the Application.

I. GENERAL STATEMENT

7. Neither I, the Firm, nor any member, senior counsel, or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, the Trustee or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the Office of the United States Trustee or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the Southern District of Texas, except as set forth herein. Additionally, we are "disinterested persons" pursuant to 11 U.S.C. § 101(14), and hold no actual or potential conflicts, subject to the disclosures in section III below. Described in section III are all presently known connections and relationships between Dykema, on the one hand, and the Debtors, the Debtors' creditors, the Trustee, any other party-in-interest, their respective attorneys and accountants, the United States Trustee and any person employed in the office of the United States Trustee on the other hand. In preparing this Declaration, Dykema performed a review of the connections and relationships between Dykema and certain creditors of the Debtors and other parties in interest. Dykema is continuing to review conflicts. To the extent that I become aware of any additional relationships, I will promptly file a supplemental declaration. Dykema will implement appropriate internal procedures to protect the interests of the Debtors in connection with the representations and relationships described below.

II. SEARCH METHODS

8. The Firm has made the following investigation of its connections prior to submitting this Declaration. We have utilized Dykema's conflicts database management system (the "System"), which is designed to reveal the potential for conflicts of interest and other connections to existing and former clients and to many thousands of third parties Dykema never represented, to analyze the list of interested persons and entities annexed to the Debtors' retention applications included on **Schedule 1**, attached hereto.

9. To the extent that I have been able to ascertain, the Firm is not a creditor, an equity security holder or an insider of the Debtors, nor does it have any direct or indirect relationship to, connection with, or interest in, the Debtors that would make its interests materially adverse to the interests of the estate or of any class of creditors or equity security holders.

10. Except as disclosed on **Schedule 2**, attached hereto, Dykema and its attorneys have no connection with the Debtors or with any of the individuals or entities, of whom I am aware, that are or may become creditors or parties in interest in these Chapter 11 Cases; nor, to the extent they are known to us, does the Firm have any connection with such parties' respective attorneys and accountants. Further, the Firm and its attorneys do not have any connection with the United States Trustee for the Southern District of Texas, or any person employed in the office of the United States Trustee for the Southern District of Texas, except from those arising from appearing in bankruptcy cases filed in the Southern District of Texas. To the extent Dykema discovers any other connections, I will promptly supplement this disclosure.

III. THE CONNECTIONS CURRENTLY KNOWN TO DYKEMA

11. Dykema represents that, to the best of its knowledge, except as disclosed on **Schedule 2**, Dykema knows of no fact or situation that would represent a potential or actual conflict of interest for Dykema with regard to the Committee at this time.

12. To the extent that issues arise that would cause the Committee to be adverse to any of Dykema's clients and/or their affiliates such that it would not be appropriate for Dykema to represent the Committee with respect to any such matters, the Committee will retain conflicts counsel to represent the Committee with respect to those matters.

13. To the best of my knowledge, information and belief after reasonable inquiry, Dykema is disinterested withing the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Dykema, nor any of its members, special counsel or associates:

(a) are creditors, equity security holder, or insiders of the Debtors;

(b) are or within two years before the Petition Date were, a director, officer, or employee of the Debtors; or

(c) have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtors or for any other reason.

14. It is possible that Dykema may have represented or may continue to represent creditors or interest holders of the Debtors in wholly unrelated matters from time to time, but Dykema is not representing and will not represent any such persons in these Chapter 11 Cases. To the extent Dykema becomes aware of such representation, Dykema will file a supplement to this Declaration.

15. As part of its practice, Dykema appears in many cases, proceedings, and transactions involving many different attorneys, counsel, accountants, financial consultants, and investment bankers, some of which now or in the future may represent claimants and parties in interest in these Chapter 11 Cases. I have advised the Committee that Dykema has not and will not represent any such entities in relation to the Debtors' Case and that Dykema does not have any relationship with any such entities that would be adverse to the Committee or its interests in the matters upon which Dykema is to be employed.

16. Dykema has not received a retainer in these Chapter 11 Cases. Dykema will represent no entity other than the Committee in these Chapter 11 Cases.

17. Dykema recognizes, and takes very seriously, its continuing responsibility to be aware of, and to further disclose, any relationship or connection between it and other parties-in-interest to the Debtor's bankruptcy estate as they appear or become recognized during the Case. Accordingly, we reserve the right to, and shall supplement this disclosure if necessary as more information becomes available to us.

IV. COMPENSATION

18. The Committee understands that Dykema intends to seek compensation for professional services rendered in connection with the Debtor's case, subject to the Court's approval, and in compliance with the applicable provisions of Subject to Court approval and in accordance with section 330(a) of the Bankruptcy Code, compensation will be payable to Dykema on an hourly basis, plus reimbursement of actual, necessary expenses incurred by Dykema. Below are the primary attorneys and paraprofessional within Dykema who will represent the Committee and their respective discounted hourly rates:

Attorney	Position	Rate
William Hotze	Member	\$750
Michael Twomey	Member	\$715
Jennifer Cruz	Senior Counsel	\$625
Dominique Douglas	Associate	\$575
Sebastian Campos	Paralegal	\$350

19. From time to time, other attorneys and paralegals from Dykema may serve the Committee in connection with the matter.

20. Dykema has advised the Committee that the hourly rates set forth above are subject to annual increases in the normal course of Dykema's business. In the event of any such increase, Dykema will provide the U.S. Trustee and the Committee with written notice of any such increase

and file a supplemental affidavit (a “Supplemental Affidavit”) with the Court. Any Supplemental Affidavit will explain the basis for the requested rate increase in accordance with section 330(a)(3)(F) of the Bankruptcy Code.

21. It is Dykema’s policy, in all areas of practice, to charge its clients for additional expenses incurred in connection with the client’s case. The expenses charged to clients include, among other things, postage in excess of \$2.50 and express mail charges, special or hand delivery charges, internal photocopying charges, external photocopying charges at the actual cost charged, print charge for documents in excess of 20 pages at \$0.15 per page, travel expenses, expenses for “working meals,” and computerized research. Dykema does not charge for long distance calls other than conference calls. Dykema does not charge for incoming or outgoing telecopier services. Otherwise, Dykema will charge the Committee for expenses in a manner and at rates consistent with charges made generally to Dykema’s other clients and consistent with this Court’s rules and the applicable U.S. Trustee guidelines.

22. No agreement exists, nor will any be made, to share any compensation received by Dykema for its services of behalf of the Committee with any other person or firm.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury on Monday, June 1, 2026, that the foregoing statements are true and correct.

By: /s/ William Hotze
William Hotze

Schedule 1
Potential Parties in Interest

EXHIBIT 1

Potential Parties in Interest¹

Debtors

STOPLOSS SPECIALIST, LLC
STOPLOSS, LLC
STOPLOSS RESPONSE SERVICES, LLC
TM36, LLC
STOPLOSS LOGISTICS, LLC

Directors and Officers

JOHN LEWIS
PAUL BLACK

Bankruptcy Judges and Staff

Chief Judge Eduardo V. Rodriguez
Judge Alfredo R Pérez
Judge Christopher M. Lopez
Judge Jeffrey P. Norman
Judge Marvin Isgur
Aaron Jackson
Ana Castro
Garrett Cole
Jeannie Chavez
Rosario Saldana
Shannon Holden
Sierra Thomas-Anderson
Tracey Conrad
Tyler Laws
Yesenia Lila

United States Trustee Office

AUBREY THOMAS
GARY WRIGHT
KEVIN M. EPSTEIN
MILLIE APONTE SALL

¹ This list (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. As listing a party once allows PH's conflicts specialists to run a check on such party, the Debtors have attempted to remove duplicate entries where possible. Accordingly, a party that otherwise may fall under multiple categories is likely to be listed under only one category.

Banks/Lender/UCC Lien Parties/Administrative Agents

431KW, LLC
MARLIN LEASING CORP
SUMITOMO MITSUI FINANCE AND LEASING COMP
RECOVERY LOGISTICS FINANCE
WABASH FINANCIAL SERVICES

Customers

DAIQUIRIS SUPREME
CAVA
FIVE STAR LABOR, INC
GUERNSEY HOLDINGS, LLC
J&K SAI HOSPITALITY, LLC
JATINDER SINGH GURBAKSH SINGH
FORTUNE PROPERTY
LEE HO VILLAGE
RENNAISSANCE TOWER
GRANDE ISLE TOWERS I&II COA, INC

Debtor Professionals

PABLO BONJOUR
PORTER HEDGES LLP
SOUTHCOAST MANAGEMENT GROUP DBA VERITAS RESTRUCTURING GROUP

Factoring Providers

RECOVERY LOGISTICS FINANCE, LLC

Insurance, Surety, and Letters of Credit

BANK OF AMERICA

Litigation Parties

79 INDIVIDUAL CONDO OWNERS
APPLE TEN HOSPITALITY TEXAS SERVICES III, LLC
ARAMSCO, INC. (DBA JON DON)
BEACON SALES ACQUISITION, INC.
BOLLIER CICCONE STINSON LLP
CALL N HAUL DUMPSTER SERVICE, LLC
CANON FINANCIAL
CAYMAN CONSTRUCTION LLC
CINCINNATI INSURANCE
CORT BUSINESS SERVICES

FAST GUARD
FBT GIBBONS
FIH, LLC
FIVE STAR LABOR
FORD MOTOR CREDIT COMPANY
FORTUNE I AND FORTUNE II
GARRETT MCKENZIE, INC.
GRAND ISLE TOWERS I AND II CONDO ASSOCIATION
GRAYSTREET MGMT SERVICES AND GS 1201 ELM, LLC
INSURED ADVOCACY GROUP, LLC AND INSURED ADVOCACY GROUP II, LLC
J&K SAI HOSPITALITY
JATINDER SINGH
LEE HO VILLAGE PROPERTY OWNERS ASSOCIATION, INC.
MCELROY METAL MILL INC.
PNC BANK NA
RC SOLUTIONS LLC
RECOVERY LOGISTICS FINANCE, LLC
RECOVERY WAVEZ VOA LLC
SHAW CONSTRUCTION AND ELECTRIC
SHER TREMONTE LLP
STELLAR GRAPHIX, LLC
STONE MOUNTAIN ACCESS SYSTEMS
SUNBELT RENTALS V. HEAVY METAL RECYCLING, LLC
UNITED RENTALS

Non-Debtor Affiliates

STOPLOSS MECHANICAL, LLC
STOPLOSS DRONE SERVICES, LLC
STOPLOSS CONSTRUCTION, LLC
431KW, LLC

Ordinary Course Professionals

MEAUX ACCOUNTING
BAMBECK & O'CONNOR, LLP
WRIGHT, MOORE, DEHARD, DUPUIS, HUTCHINSON, CPA
ERICKA H. DEES, CPA
FROST BROWN TODD, LLC
MARTIN POWERS & COUNSEL, PLLC
PERRY DAMPF DISPUTE SOLUTIONS
SHUTTS & BOWEN, LLP
GUARDIAN COMPUTER

Significant Equity Holders

431KW, LLC

Vendors

ACADIANA WASTE SERVICES
ADT
AFR FURNITURE RENTAL
AMERICAN ARBITRATION ASSOCIATION
AMERICAN EXPRESS
APEX RESPONSE GROUP
ARAMSCO
ARTIC ICE HOUSTON LLC
BAMBECK & O'CONNOR LLP
BEACON BUILDING PRODUCTS
BERKSHIRE BAY CONTRACTORS
BERNHARDT SERVICES
BEXAR COUNTY CLERK
BEXAR COUNTY TAX ASSESSOR-COLLECTOR
BIG BOY FENCES
BLUE CROSS BLUE SHIELD OF LOUISIANA
BOLLIER CICCONE LLP
BRIDGEFIELD CASUALTY INSURANCE COMPANY
CALL CENTER CONNECT INC.
CALL N HAUL DUMPSTER SERVICE, LLC
CALZONE ADVERTISING
CANON FINANCIAL SERVICES INC.
CAYMAN CONSTRUCTION LLC
CHASE MARSHALL ARCHITECTS
CHAVEZ LAND INCOME PROPERTIES LP
CHRIS TUCKER CONTRACTING LLC
CINCINNATI INSURANCE
CINTAS
CITY OF HOUSTON CONTROLLER'S OFFICE
CLEAR SPRINGS WATER CO.
COAST
COAST FLEET VISA
COBRA MANAGEMENT SERVICES
COMMAND 247 LLC
COMMONWEALTH OF VIRGINIA
COMMUNITY COFFEE COMPANY LLC
CONCENTRA
CORPORATE CREATIONS
COX COMMUNICATIONS
CT CORPORATION
CURRENT ELECTRICAL SERVICES
DEPARTMENT OF THE TREASURY - INTERNAL REVENUE SERVICE
DUHON MACHINERY OF LAFAYETTE L.L.C.

DWIGHT ANDRUS INSURANCE
DWM HOLDINGS
DYNAMIC DRUG SCREENING, LLC
ECOTRAK LLC
EDENSCAPES, LLC
ELOS ENVIRONMENTAL, LLC
ERICKA H. DEES, CPA, LLC
ESTES INDUSTRIAL
EVENT SOLUTIONS
EXEC U STORE
FAST GUARD SECURITY SERVICE
FEDEX
FIH, LLC CONSULTING
FIRST INSURANCE FUNDING
FIVE STAR LABOR INC
FLORIDA DEPARTMENT OF TRANSPORTATION
FORD MOTOR CREDIT COMPANY, LLC
FORT BEND COUNTY TOLL ROAD AUTHORITY
GARDNER'S ELECTRICAL SERVICES
GARRETT MCKENZIE, INC.
GAS SOUTH
GEAUXPASS
GEORGIA COMPTROLLER - STATE ACCOUNTING
GEORGIA DEPARTMENT OF REVENUE
GRAY & COMPANY
GUARDIAN COMPUTER
GULF COAST STABLES
HARRIS COUNTY TAX ASSESSOR - COLLECTOR
HARRIS COUNTY TOLL ROAD AUTHORITY
HEALTHEQUITY
HERC RENTALS
HOMewood SUITES BY HILTON
HONESTY ENVIRONMENTAL SERVICES INC.
HOYA VISION
HUB CITY FORD
HUB INTERNATIONAL
HUB INTERNATIONAL GULF SOUTH
ICE PLANT INC.
INTERNAL REVENUE SERVICE
IPFS CORPORATION
IRS
J & K SAI HOSPITALITY
JOHN LEWIS
JON-DON
KOALA ROOFING NC
LAFAYETTE LOCKSMITH & SECURITY

LAFAYETTE PARISH ASSESSOR
LAUREN & CO, ATTORNEYS AT LAW
LOGISTIC DYNAMICS LLC
LOUISIANA CAT RENTAL
LOUISIANA DEPARTMENT OF INSURANCE
LOUISIANA DEPARTMENT OF REVENUE
LOUISIANA DEPARTMENT OF TREASURY
M&L INDUSTRIES LLC
MAGNOLIA WATER UOC LLC
MCELROY METAL, INC.
MCRAY CRANE & RIGGING INC.
MEAUX ACCOUNTING
MUTUAL OF OMAHA
NEXT PLUMBING, LLC
NORTH TEXAS TOLLWAY AUTHORITY
NOVATECH, INC
NTC, INC.
OFFICE OF THE UNITED STATES TRUSTEE
OVERSIZED VEHICLE PARKING PROS
PARAOCCDOCS INC, BHP / LAKE CHARLES
PARK ONE DALLAS
PARKING REVENUE RECOVERY SERVICES, INC.
PARKONE DALLAS
PEAC SOLUTIONS
PEOPLES WATER SERVICE COMPANY
PROCUREDESK LLC
RALPH'S PEST CONTROL
RC SOLUTIONS
REPUBLIC SERVICES
RESIDENCE INN DALLAS
RIVER LINK
ROOF WRAP SERVICES LLC
RUTAN & TUCKER, LLP
S.O.S JUNK & TRASH REMOVERS
SAFETY OPPS
SATELLITE SHELTERS, INC
SATWA OCC. LLC
SB EXPRESS LANES
SEGURA CONSULTANTS LLC
SHREDAMERICA TEXAS LLC
SHUTTS & BOWEN LLP
SOUTHEASTERN COMPUTER ASSOCIATES, LLC
SPECTRUM
SPRINGHILL SUITES DALLAS
ST MARTIN PARISH WATER WORKS
ST. MARTIN PARISH ASSESSOR

ST. MARTIN PARISH SHERIFF
STAFFORD ENGINEERING, INC
STELLAR GRAPHIX LLC
STONE MOUNTAIN
SYSTEL BUSINESS EQUIPMENT (GA)
TEXAS ATTORNEY GENERAL'S OFFICE
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
TEXAS SECRETARY OF STATE
TEXAS WORKFORCE COMMISSION
THE DUMPSTER GUY
THE GALLERY COLLECTION
THE JAMES FIRM LLC
TOTAL TIRE SOLUTIONS
TRAVELERS
TRINITY GRAPHICS SIGNS & DESIGN
TRINITY GRAPHX
TRUIST
TRUIST BANK
UNITED RENTALS
UNITED STATES ATTORNEY
UPTOWN AT COLE PARK
US ASSURE
USA STORAGE CENTERS
VALOR INTELLIGENT PROCESSING, LLC
VEALS TRANSPORTATION SERVICE
VEDDERPRICE P.C.
VERIFI
VERIZON
VERMILION FIRE & SAFETY
WARDEN SECURITY SERVICES
WASTEOPS LLC
WELLS FARGO VENDOR FINANCIAL SERVICES
WILLSCOT
WINDWARD X ASSOCIATES LLP (GA)
WRIGHT, MOORE, DEHART, DUPUIS & HUTCHINS
XSTREME MD

Schedule 2
Connections to Parties in Interest

Potential Party in Interest	Relationship to Debtors	Connection to Firm
Sumitomo Mitsui Finance and Leasing Company	Lender	Represented affiliate in unrelated concluded matter
Wabash Financial Services	Lender	Represented affiliate in unrelated concluded matter