

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

<b>In re:</b>  <b>MA LERIN HILLS HOLDER, LP, et al.,</b>  <b>Debtors.</b>	§ § § § § § § §	<b>Chapter 11</b>  <b>Case No. 15-51424</b>  <b>Jointly Administered</b>
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**NOTICE OF PLAN SUPPLEMENT**  
**(WIND-DOWN/ADMINISTRATIVE BUDGET)**

PLEASE TAKE NOTICE that MA Lerin Hills Holder, LP (“Landco”), LH Devco, Inc. (“Devco”) and Lerin Hills Utility Easement Holder, LLC (“Pipeco”), the debtors and debtors-in-possession (collectively, the “Debtors”) in the above captioned cases (the “Cases”) hereby file this Notice of Plan Supplement,<sup>1</sup> pursuant to Article III, Section 3.1 of the *First Amended Joint Plan of Liquidation* (the “Plan”) [Docket No 132]. The Wind-Down/Administrative Budget is attached hereto as Exhibit “A”. The filing of this Wind-Down/Administrative Budget does not constitute consent to an extension of the current post-petition financing if an order is not entered confirming a plan in accordance with the prior order of the Court on or before September 12, 2015.

This Plan Supplement may be amended up to three (3) business days prior to the Confirmation hearing.

All Plan Supplements are incorporated into and shall be a part of the Plan.

<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Plan.

Dated: August 24, 2015

Respectfully submitted,

**DYKEMA COX SMITH**

By:  /s/ Deborah D. Williamson

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**ATTORNEYS FOR DEBTORS  
AND DEBTORS-IN-POSSESSION**

# **EXHIBIT "A"**

**Plan Supplement - Administrative/Wind-Down Budget**

	<b>August</b>	<b>September</b>	
Champion Security	\$ 37,434.00	\$ 37,434.00	
Harrison Carter	\$ 2,000.00	\$ 2,000.00	
GBRA	\$ 17,031.81	\$ 17,031.81	
Bury Partners	\$ 30,000.00	\$ 30,000.00	
Alamo Architects	\$ 5,000.00	\$ 5,000.00	
Aaron Button & Expenses	\$ 10,000.00	\$ 10,000.00	
Hill Country Outhouses	\$ 256.20	\$ 256.20	
Bandera Electric Usage	\$ 1,250.00	\$ 1,000.00	
Knowlton - Accel/Deccel Work & Bond	\$ 150,000.00	\$ 89,163.65	
Knowlton On-site Pressure Testing	\$ 10,000.00	\$ 25,000.00	
Knowlton Entry Road Repairs	\$ 5,000.00	\$ 10,000.00	
Charles Cook & Expenses	\$ 45,000.00	\$ 45,000.00	
Alpha Testing	\$ 2,500.00	\$ 5,000.00	
Gate House Electrical/Ac/Interiors	\$ 15,000.00	\$ 15,000.00	
Receiver	\$ 39,000.00	\$ 41,500.00	
Golden Steves	\$ 9,000.00	\$ 9,000.00	
Dykema	\$ 70,000.00	\$ 70,000.00	
Padgett	\$ 8,000.00	\$ 8,000.00	
<b>TOTAL</b>	<b>\$ 456,472.01</b>	<b>\$ 418,385.66</b>	<b>\$ 874,857.67</b>