

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA**

IN RE:	)	Case No. 17-50354
	)	
WRIGHT’S WELL CONTROL	)	Chapter 11
SERVICES, LLC,	)	
	)	JUDGE ROBERT SUMMERHAYS
Debtor.	)	

**OBJECTION TO AMENDED DISCLOSURE STATEMENT**

Oceaneering International, Inc. (“Oceaneering”) files this Objection to the “*Debtor’s First Amended Disclosure Statement Dated November 2, 2017,*” (“Amended Disclosure Statement”) filed by Wright’s Well Control Services, LLC (“Debtor” or “Wright’s”).

In the interest of economy and efficiency, Oceaneering incorporates by reference its “Objection to Disclosure Statement” filed at Docket No. 139 (the “Original Objection”).

The Amended Disclosure Statement describes a plan that will pay unsecured creditors in cash from operations and not just from whatever WWCS recovers (if anything) in its litigation with Oceaneering, which resolves one structural problem noted in the Original Objection. However, the Amended Disclosure Statement does not provide sufficient information to determine if a reorganized WWCS is likely to be able to make those payments.

For these reasons and others, the Court should deny approval of the Amended Disclosure Statement and consider converting this case to one under Chapter 7 of the Bankruptcy Code, as discussed in the Court’s Order setting a hearing on the Disclosure Statement.

Date: November 21, 2017.

Respectfully submitted,

KEAN MILLER LLP

By: /s/ J. Eric Lockridge

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***Attorneys for Oceaneering  
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Certificate of Service

I certify that on November 21, 2017, I caused a copy of the foregoing “Objection to Disclosure Statement,” to be served on Debtor through its counsel of record, the Office of the U.S. Trustee, and all other parties requesting notice via the Court’s CM/ECF email noticing system.

/s/ J. Eric Lockridge