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PROPOSED ATTORNEYS
FOR THE DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	Chapter 11
DOWNRIGHT DISPOSAL, L.L.C.	§	
	§	
	§	
Debtor.	§	Case No. 15-
	§	

GLOBAL NOTES AND STATEMENT OF LIMITATIONS AND DISCLAIMER REGARDING DEBTOR'S LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

The sole Managing Member of the above-captioned debtor (the "***Debtor***") in this chapter 11 case is Petroleum Asset Management Corporation ("***PAMCO***"), which filed for bankruptcy protection in this Court on August 14, 2014 (Case No. 14-33944). Upon motion by creditors, this Court ordered the U.S. Trustee to appoint a chapter 11 trustee in the PAMCO bankruptcy proceeding. *See* PAMCO Dkt. No. 23. Thereafter, Stephen M. Pezanosky was appointed as chapter 11 trustee (the "***Trustee***") in the PAMCO bankruptcy proceeding. *See* PAMCO Dkt. No. 28.

In conjunction with the filing of the list of creditors holding 20 largest unsecured claims in the PAMCO bankruptcy proceeding, the Trustee attached the *Global Notes and* Statement *of Limitations and Disclaimer Regarding Debtors' Schedules of Assets and Liabilities and*

Statement of Financial Affairs [PAMCO Dkt. No. 47] (the "***Global Notes***"). Among other things, the Global Notes state:

> The circumstances surrounding the commencement of the Debtor's case and subsequent appointment of the Trustee has materially impacted the Trustee's ability to access and marshal information about the Debtor's business. In preparing the [list of creditors holding 20 largest unsecured claims], the Trustee relied upon limited information derived from the Debtor's sole shareholder and President, Randy May. Very limited books and records have been provided to the Trustee by the Debtor at the time of such preparation, and Mr. May asserts that Debtor has not maintained books and records for the past two years. As a result, the Trustee is unable to confirm that he has received all of the information that is relevant and necessary for completing the [list of creditors holding 20 largest unsecured claims].

As outlined above, PAMCO, under the direction of the Trustee, is the sole Managing Member of the Debtor. Accordingly, the entirety of Global Notes are adopted and incorporated herein by reference. For the avoidance of doubt, the Trustee and the Debtor reserve all rights to amend, supplement or otherwise modify the list of creditors holding 20 largest claims as is necessary and appropriate, consistent with applicable provisions of the Bankruptcy Code and the Bankruptcy Rules.

The Trustee, in his capacity as the chapter 11 trustee of the Debtor's sole managing member, has signed the affixed list of creditors holding 20 largest unsecured claims. In reviewing and signing the list, the Trustee has necessarily relied upon the efforts, statements and representations of Mr. May. The Trustee has not (and could not have) personally verified the accuracy of each statement and representation contained in the list, including statements and representations concerning amounts owed to creditors, classification of such amounts and creditor addresses. The Trustee has no independent knowledge, however, that would directly contradict the information in the list.

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	§	
	§	
Debtor.	§	Case No. 15-
	§	

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or dept. of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	Indicate if claim is contingent, unliquidated, disputed or subject to setoff	Amount of claim (if secured also state value of security)
H. Ray Collins 7498 FM 1511 Centerville, TX 75833		Land owner on Lease	Contingent & Unliquidated	$0.00
Maxine Collins 7498 FM 1511 Centerville, TX 75833		Land owner on Lease		

S-Con Services, Inc. 8326 W. Hwy 21 Bryan, Texas 77807	Green B. Smith, Jr. S-Con Services, Inc. 8326 W. Hwy 21 Bryan, Texas 77807 (979) 822-4445	Trade debt	Unknown	Unknown

DECLARATION UNDER PENALTY OF PERJURY
ON BEHALF OF A CORPORATION OR PARTNERSHIP

I, Stephen M. Pezanosky, as Chapter 11 Trustee of Petroleum Asset Management Corporation, the sole Managing Member of Downright Disposal, LLC, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Dated: August 31, 2015

Signature _____

Name: Stephen M. Pezanosky
Title: Chapter 11 Trustee of Petroleum Asset Management Corporation, sole Managing Member of Downright Disposal, LLC