

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

BIJU MUKRUKKATTU JOSEPH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
v.	)	Civ. No. 1:13-cv-00324-RC-ZJH
	)	
SIGNAL INTERNATIONAL LLC, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**FOURTH STATUS REPORT**

Plaintiffs and Defendants Sachin Dewan, Malvern Burnett and Signal International, LLC, and certain of its affiliates (the “Signal Entities”), in accordance with the Court’s Order Staying Case Pursuant to Bankruptcy [Dkt. No. 335] requiring the parties to file a notice every 120 days informing the Court of the status of the Signal bankruptcy proceedings, hereby file this Status Report as of November 8, 2016.

As noted in the parties’ prior reports [Dkt. Nos. 338, 339, and 340], the Signal Entities filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code on July 12, 2015. *In re Signal Int’l, Inc, et al.*, No. 15-11498 (Bankr. D. Del. July 12, 2015) (the “Bankruptcy Court”).<sup>1</sup> On November 24, 2015, the Bankruptcy Court entered its Findings of Fact, Conclusions of Law and Order Confirming Debtors’ First Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [ECF No. 555] (the “Confirmation Order”), confirming the Signal Entities’ plan of liquidation, which implemented the plan support

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<sup>1</sup> The other entities are: *Signal Ship Repair, LLC* (Case No. 15-11499), *Signal Int’l, LLC* (Case No. 15-11500), *Signal Int’l Texas GP, LLC* (Case No. 15-11501), and *Signal Int’l Texas, L.P.* (Case No. 15-11502). By the Bankruptcy Court’s order, all five cases are being jointly administered with the *Signal Int’l, Inc.* case. *In re Signal Int’l, Inc.*, No. 15-11498 (Bankr. D. Del. July 14, 2015), ECF No. 55.

agreement among the Plaintiffs, the Signal Entities and certain other parties, for the settlement of, *inter alia*, the Plaintiffs' claims against the relevant Signal Entities. Pursuant to the Plan, a litigation trust (the "Signal Litigation Trust") has been created for the distribution of the settlement proceeds. That process remains ongoing, as the Signal Litigation Trust distributed Trust Claim Forms in February. The Plaintiffs initially had 60 days from the distribution date to submit their claim forms, which deadline was subsequently extended through June 15, 2016.

The Plan became effective on December 14, 2015 [Bankr. Dkt. No. 589]. As of that date, pursuant to the Confirmation Order, "any suit, legal action, or other proceeding ... in any forum in the United States that is released, stayed, or enjoined pursuant to Article XI of the Plan against or affecting any Released Party [the Signal Entities], shall be stayed, enjoined or otherwise prohibited from continuation as to any Released Party." (Confirmation Order at 25.)

In light of the entry of the Confirmation Order, the undersigned parties respectfully request that the stay remain in effect. Pursuant to the Court's Order on July 14, 2015 [Dkt. No. 335], the parties will file a further status update in 120 days.

[signatures on following pages]

Respectfully submitted, this 8th day of November, 2016.

<p><u>/s/ John H. Fleming</u> John H. Fleming (<i>pro hac vice</i>) Travis J. Mock (<i>pro hac vice</i>) Kara D. Ford (<i>pro hac vice</i>) Heather M. Niemeyer (<i>pro hac vice</i>) Mary Beth Martinez (<i>pro hac vice</i>) Matthew J. Bowness (<i>pro hac vice</i>)</p> <p><b>SUTHERLAND ASBILL &amp; BRENNAN LLP</b> 999 Peachtree Street NE, Suite 2300 Atlanta, Georgia 30309-3996 Telephone: (404) 853-8000 Facsimile: (404) 853-8806 john.fleming@sutherland.com travis.mock@sutherland.com kara.ford@sutherland.com heather.niemeyer@sutherland.com marybeth.martinez@sutherland.com matthew.bowness@sutherland.com</p> <p><b>ATTORNEYS FOR PLAINTIFFS</b></p>	<p><u>/s/ Erin Casey Hangartner (w/exp. permission)</u> Erin Casey Hangartner (La. Bar No. 24768) Alan Dean Weinberger (La. Bar No. 13331) Elham R. Rabbani (La. Bar No. 33322) Brian C. Roux (La. Bar No. 35298) Lance R. Rydberg (La. Bar No. 02089) Mitchell P. Hasenkampf (La. Ba No. 32870) Robert L. Keller III (La. Bar No. 35188) Lauren Masur Davis (La. Bar No. 34669)</p> <p><b>HANGARTNER RYDBERG &amp; TERRELL, LLC</b> 701 Poydras Street, Suite 310 New Orleans, Louisiana 70139 Telephone: (504) 522-5690 Facsimile: (504) 522-5689 ehangartner@hanrylaw.com aweinberger@hanrylaw.com erabbani@hanrylaw.com broux@hanrylaw.com lrydberg@hanrylaw.com mhasenkampf@hanrylaw.com rkeller@hanrylaw.com lmasur@hanrylaw.com</p> <p>and</p> <p>Patricia A. Bollman (La. Bar No. 17563) James L. Cornblatt (<i>pro hac vice</i>)</p> <p><b>PATRICIA A. BOLLMAN, A PROFESSIONAL LAW CORPORATION</b> 3636 S. I-10 Service Road W., Suite 200 Metairie, Louisiana 70001 Telephone: (504) 218-5887 Facsimile: (504) 304-0890 patricia@bollmanfirm.com cornblatt25@gmail.com</p> <p><b>ATTORNEYS FOR DEFENDANTS SIGNAL INTERNATIONAL, L.L.C., SIGNAL INTERNATIONAL, INC., SIGNAL INTERNATIONAL TEXAS, G.P., and SIGNAL INTERNATIONAL TEXAS, L.P.</b></p>
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	<p><u>/s/ Timothy W. Cerniglia (w/exp. permission)</u> Timothy W. Cerniglia (Tex. Bar 00789930)</p> <p><b>TIMOTHY W. CERNIGLIA, PLC</b> 1521 St. Charles Avenue New Orleans, Louisiana 70130 Telephone: (504) 586-0555 Facsimile: (504) 586-0550 tcerniglia@cernigialaw.pro</p> <p><b>ATTORNEY FOR DEFENDANTS MALVERN C. BURNETT, THE LAW OFFICES OF MALVERN C. BURNETT, A.P.C., and THE GULF COAST IMMIGRATION LAW CENTER, LLC</b></p>
	<p><u>/s/ Stephen H. Shapiro (w/exp. permission)</u> Stephen H. Shapiro (#21076)</p> <p><b>ATTORNEY AT LAW A LIMITED LIABILITY COMPANY</b> 700 Camp Street New Orleans, Louisiana 70130 Telephone: (504) 309-8442 Facsimile: (504) 934-2000 steve@shapirolaw-nola.com</p> <p><b>ATTORNEY FOR DEFENDANTS SACHIN DEWAN and DEWAN CONSULTANTS PVT. LTD.</b></p>

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2016, I electronically filed the foregoing **Fourth Status Report** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all ECF participants.

I further certify that on November 8, 2016, I served a true and correct copy of the foregoing document upon the below-named Defendants by depositing a copy of same in the U.S. Mail, with sufficient postage thereon to insure delivery, and properly addressed as follows:

Michael Pol  
Global Resources, Inc.  
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*/s/ John H. Fleming*  
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John H. Fleming