

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

SATHEESH KANNAN MARIMUTHU,)	
BALAMURUGAN MARIMUTHU,)	
MURUGANANDAM ARUMUGAM,)	
MURALIDHARAN ARUMUGAM,)	Civ. No. 1:13-cv-00499-MAC-ZJH
SATYANARAYANA ELLAPU, MOORTHY)	
NADHAMUNI, RAJENDRAN SAPPANI,)	
RAJENDRAN SUBRAMANI, VENKATA)	
SATYA SIVAGI RAO TALABATHULLA, and)	
SAMMANASUNATHAN SILUVAIMUTHU,)	
)	
Plaintiffs,)	
)	
v.)	
)	
SIGNAL INTERNATIONAL LLC, SIGNAL)	
INTERNATIONAL, INC., SIGNAL)	
INTERNATIONAL TEXAS, G.P., SIGNAL)	
INTERNATIONAL TEXAS, L.P., MALVERN C.)	
BURNETT, GULF COAST IMMIGRATION)	
LAW CENTER, L.L.C., SACHIN DEWAN, and)	
DEWAN CONSULTANTS PVT. LTD. (a/k/a)	
MEDTECH CONSULTANTS),)	
)	
Defendants.)	

**PLAINTIFFS' NOTICE UPDATING THE COURT ON STATUS OF THE SIGNAL
BANKRUPTCY PROCEEDING AS OF MARCH 8, 2017**

The Plaintiffs in the above-referenced action (the "Plaintiffs") submit this Notice Updating the Court on Status of the Signal Bankruptcy Proceeding as of November 7, 2017.

As noted in Plaintiffs' prior notices, 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) in the United States Bankruptcy Court for the

District of Delaware (the “Bankruptcy Court”).¹ 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 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 and the Plaintiffs submitted their claim forms.

The Plan became effective on December 14, 2015. 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 and the Signal Entities’ ongoing bankruptcy cases, Plaintiffs respectfully request that the stay remain in effect for a further 120 days. Plaintiffs will file a further status update in 120 days.

¹ 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.

Date: November 6, 2017

By: /s/ Eric H. Findlay
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record was served with the foregoing document via electronic mail by the Court's CM/ECF filing system on November 6, 2017.

I FURTHER CERTIFY that U.S. Mail sent to the address of record for Global Resources, Inc. has been returned undeliverable, therefore I am unable to serve a copy of these pleadings on Global Resources, Inc. The last known address of Global Resources, Inc. is:

Global Resources, Inc.
c/o Michael Pol
13 Herring Road
Beaumont, MS 39423-2055

/s/ Eric H. Findlay
Eric H. Findlay