

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re:)	
)	
ATLANTIC FABRICATION & DESIGN)	Case No. 17-14891-JDL
LLC,)	Chapter 11
)	
Debtor.)	
)	

DECLARATION OF PAUL D. STITT IN SUPPORT OF THE PLAN

I, Paul D. Stitt, declare under penalty of perjury:

1. I am a Member Manager of Atlantic Fabrication & Design LLC (“Debtor”), and that I have personal knowledge of the matters set forth herein and authority to make this declaration.

2. Michael Johnson and myself are the only Members of the Debtor. There are no other owners, officers, members, directors, or insiders to be disclosed.

3. No party timely filed any pleading to extend time to Object to the Plan.

4. No party timely filed any Objections to the Plan, Disclosure Statement, or Confirmation.

5. No other party has filed a Plan and the Plan filed by Debtor is the only proposed plan in this case.

6. The Debtor is entitled to propose a Plan in this case.

7. The Debtor is a business entity and not an individual.

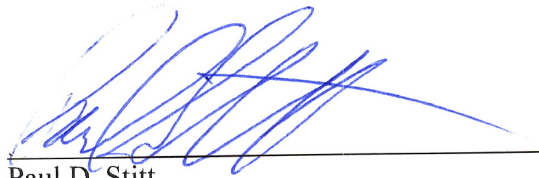
8. The Debtor has no Domestic Support Obligations.

9. The Debtor has no retiree benefit programs as that term is defined in Section 1114.

10. The Plan proposes to pay all tax claims in a period of time not to exceed five years.
11. The Plan proposes to pay administrative and priority expenses in full on the effective date.
12. The Plan was accepted by all impaired classes, exclusive of equity holders or insiders, as evidenced by the Ballot Tabulation filed into the record [Doc. No. 94].
13. The Debtor has paid all bankruptcy filing fees, is current on United States Trustee (“UST”) fees under 28 U.S.C. Section 1934, and the Plan proposes to continue paying all required UST fees.
14. All required monthly operating reports have been filed. To the best of my knowledge and abilities, those reports are true and correct.
15. I believe the Disclosure Statement contains adequate information as that term is defined Section 1125.
16. The Debtor transmitted the Plan and the Disclosure Statement at the time of soliciting acceptance or rejection of the Plan from any party.
17. The Debtor has only one disclosure statement and it was transmitted to all holders of a claim or interest in all classes.
18. A cash-flow projection and liquidation analysis are attached to the Disclosure Statement. To the best of my knowledge and abilities, those are true and correct.
19. The unsecured creditors will receive at least as much under the proposed Plan as if the Debtor were to liquidate under Chapter 7.
20. The secured creditors will receive value under the Plan equal to or greater than the value of the collateral securing their claims.

21. All creditors or claims were properly designated to corresponding classes of claims.
22. The Plan identifies which classes of claims are impaired or unimpaired.
23. The Plan specifies the treatment of each class of claims and provides the same treatment for each claim or interest of a particular class.
24. The Plan does not unfairly discriminate against any creditor or class of creditor.
25. To the best of my knowledge and abilities, the Plan is fair and equitable.
26. I believe the Debtor will be able to successfully carry out the Plan and that the Plan will not result in liquidation or another bankruptcy.
27. I believe the Plan has been proposed in good faith.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Paul D. Stitt
Member Manager

Dated: July 9, 2018

Filed by:
SANSONE HOWELL PLLC

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