

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
STARION ENERGY, INC., <i>et al.</i> , ¹	Case No. 18-12608 (MFW)
Debtors.	(Jointly Administered)
	Re: Docket Nos. 263 and 265

**NOTICE OF FILING OF EXHIBITS REGARDING DEBTORS' AMENDED PLAN OF
REORGANIZATION AND CORRESPONDING DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE that on April 3, 2020 Starion Energy Inc., *et al.*, (the “Debtors”) filed (i) Debtors’ Amended Plan of Reorganization (“Amended Plan”) [D.I. 263] and (ii) Disclosure Statement for Debtor’s Amended Plan of Reorganization (“Disclosure Statement”) [D.I. 265] with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that a true and correct Exhibit A to the Amended Plan is attached hereto as Exhibit 1.

PLEASE TAKE FURTHER NOTICE that Exhibit A to the Disclosure Statement is a copy of the Amended Plan and can be found at Docket No. 263. A true and correct copy of Exhibit B to the Disclosure Statement is attached hereto as Exhibit 2.

¹ The Debtors and the last four digits of their respective tax identification numbers are: Starion Energy Inc. (0943); Starion Energy NY Inc. (4319); Starion Energy PA Inc. (1201). The Debtors’ corporate headquarters is located at, and the mailing address for each Debtors is, 751 Straits Turnpike, Suite 2000, Middlebury CT 06762, Attn: Alexandra Isaac, Esq.

Dated: April 7, 2020
Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Ronald S. Gellert

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EXHIBIT 1

EXHIBIT A TO DEBTOR'S AMENDED PLAN OF REORGANIZATION

LIST OF EXECUTORY CONTRACTS AND LEASES TO BE ASSUMED

Party Name	Nature of Lease
GM Financial Leasing	2016 Cadillac Escalade
Land Rover Financial	2016 Land Rover, Range Rover
Mercedes-Benz Financial	2018 Mercedes-Benz GLC300W4
Porsche	2017 Porsche 911 Turbo
751 Straits Turnpike LLC	Lease for corporate headquarters
Customized Energy Solutions, Ltd.	
EC Info Systems	
Emera Energy Services, Inc.	
Loyalty Solutions, LLC	
Nexxa Group, Inc.	
Quantum Gas & Power Services, Ltd.	
Trusted TPV	

EXHIBIT 2

**EXHIBIT B TO DISCLOSURE STATEMENT FOR
DEBTOR'S AMENDED PLAN OR REORGANIZATION**

Starion Energy Inc., et al - Liquidation Analysis

Proposed Chapter 11

	<u>Dec 31, 19</u>	
Current Assets		
Checking/Savings		
1000 · Bank Accounts	11,532,701.92	
Total Checking/Savings	11,532,701.92	
Accounts Receivable		
1100 · Accounts Receivable	7,475,733.32	
Total Accounts Receivable	7,475,733.32	
Other Current Assets		
1200 · Deposits with Utilities	1,909,216.24	
1225 · Financial Assurance	3,839,016.55	
1235 · R.J. O'Brien	22,510.00	
1242 · NextEra	816,687.52	
1245 · Emera Energy	30,000.00	
1247 · BP Energy	220,000.00	
1248 · Hedge position MTM	-378,235.00	
1300 · Other Assets	92,672.96	
1400 · Prepaid Expense	1,757,812.71	
Total Other Current Assets	8,309,680.98	
Total Current Assets	27,318,116.22	
Fixed Assets		
1500 · Fixed Assets	0.00	
Total Fixed Assets	0.00	
TOTAL ASSETS	27,318,116.22	
LIABILITIES & EQUITY		
Liabilities		
Current Liabilities (claimed)		
Accounts Payable		
2000 · Accounts Payable	2,160,253.41	
Total Accounts Payable	2,160,253.41	
Other Current Liabilities		
2100*OE · Accrued Expenses	12,451,027.01	
2200 · Payroll Liabilities	-4,885.01	
2300 · Sales Tax Payable	57,960.22	
2400 · Loans Payable	6,505,000.00	
2500 · Loan Pay-Credit facility	3,000,000.00	
Total Other Current Liabilities	22,009,102.22	
Total Current Liabilities	24,169,355.63	
Total Liabilities	24,169,355.63	

EXPECTED RECOVERY % 100.00

Chapter 7 Liquidation

Current Assets		
Checking/Savings		
1000 · Bank Accounts	11,532,701.92	
Total Checking/Savings	11,532,701.92	
Accounts Receivable		
1100 · Accounts Receivable	3,737,867.16	
Total Accounts Receivable	3,737,867.16	
Other Current Assets		
1200 · Deposits with Utilities	954,608.12	
1225 · Financial Assurance	1,919,508.28	
1235 · R.J. O'Brien	11,255.00	
1242 · NextEra	408,343.76	
1245 · Emera Energy	15,000.00	
1247 · BP Energy	110,000.00	
1248 · Hedge position MTM	-378,235.00	
1300 · Other Assets	0.00	
1400 · Prepaid Expense	0.00	
Total Other Current Assets	3,040,480.16	
Total Current Assets	18,311,049.24	
Fixed Assets		
1500 · Fixed Assets	0.00	
Total Fixed Assets	0.00	
TOTAL ASSETS	18,311,049.24	
LIABILITIES & EQUITY		
Liabilities		
Current Liabilities	33,700,350.00	
Accounts Payable		
2000 · Accounts Payable	2,160,253.41	
Total Accounts Payable	2,160,253.41	
Other Current Liabilities		
2100*OE · Accrued Expenses	12,451,027.01	
2200 · Payroll Liabilities	-4,885.01	
2300 · Sales Tax Payable	57,960.22	
2400 · Loans Payable	6,505,000.00	
2500 · Loan Pay-Credit facility	3,000,000.00	
Total Other Current Liabilities	22,009,102.22	
Total Current Liabilities	57,869,705.63	
Total Liabilities	57,869,705.63	

EXPECTED RECOVERY % 31.60%