

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

In re:	§	
	§	Case No. 19-10653
INNOVA GLOBAL LTD.	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10654
INNOVA GLOBAL OPERATING LTD.,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10655
INNOVA GLOBAL LIMITED PARTNERSHIP,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10656
1938247 ALBERTA LTD.,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10657
INNOVA GLOBAL HOLDINGS LIMITED PARTNERSHIP,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10658
INNOVA GLOBAL INC.,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	Joint Administration Pending
	§	

In re:	§	
	§	Case No. 19-10659
INNOVA GLOBAL LLC,	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	
	§	Joint Administration Pending
	§	
In re:	§	
	§	Case No. 19-10660
BRADEN MANUFACTURING, L.L.C.	§	
	§	Chapter 15
Debtor in a foreign proceeding.	§	
	§	Joint Administration Pending
	§	

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY OF ATTORNEY IN
SUPPORT OF RECEIVER’S EMERGENCY EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND RELIEF PURSUANT TO
SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE**

1. “My name is John E. Howland. I am over the age of twenty-one (21) years of age, have never been convicted of a felony or crime involving moral turpitude, and am competent in all respects to make this affidavit. I am an attorney for PricewaterhouseCoopers Inc., LIT, (“PWC”) solely in its capacity as court-appointed receiver and authorized foreign representative of the above-captioned Debtors (the “**Receiver**”).

2. The Receiver is the Movant with respect to the *Receiver’s Emergency Ex Parte Application For Temporary Restraining Order And Relief Pursuant To Sections 105(A) And 1519 Of The Bankruptcy Code* (“**Application**”), which was filed contemporaneously with this declaration.

3. The Application seeks a temporary restraining order against collection efforts by the above-captioned debtors’ creditors. It is not practicable to give notice to the entire body of creditors which numbers almost 500, in advance of filing the Application. Advance notice should not be required because the purpose of the Application is to obtain a temporary

restraining order prior to any self-help or other collection actions. Advance notice could possibly precipitate self-help or other collection actions.

4. On April 3, 2019, I or someone with my firm directed that the Application and Notice of Hearing regarding same be served on parties in interest in this case. Proof of such service will be filed with the Court.

5. In addition, on April 3, 2019, the following parties were served with a copy of the Application and Notice of Hearing regarding same by the method indicated below.

Name	Method	Email or Fax Number	Comment
Guy P. Martel	email	gmartel@stikeman.com	Canadian Attorney for Debtors
Walker W. MacLeod	email	wmacleod@mccarthy.ca	Canadian Attorney for secured creditor ATB Financial
Jeremy W. Ryan	email	jryan@potteranderson.com	US Attorney for secured creditor ATB Financial
David L. Wallach Steven A. Erkel	email	dwallach@jonesday.com serkel@jonesday.com	Counsel for plaintiffs in <i>Babcock Power, Inc. and Vogt Power Int'l Inc. v. Innova Global, Inc.</i>
Norm Rokosh	email	nrokosh@triwest.ca	Director of Canadian Debtor Ltds. and US Debtors, except Braden
Jon Spencer	email	JSpencer@triwest.ca	Director of Canadian Debtor Ltds. and US Debtors, except Braden
Christine Wilson	email	Christine.Wilson@innova-gl.com	Director of Canadian Debtor Ltds. and US Debtors, except Braden
N. Jeffrey Trost	email	Jeff.Trost@INNOVA-gl.com	Senior Vice President, Global Environment Solutions (Innova Global, Inc.)

Executed this 4th day of April, 2019

Respectfully submitted,

ROSENSTEIN, FIST & RINGOLD

/s/ John E. Howland

John E. Howland, OBA No. 4416

Park Centre

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ATTORNEY FOR RECEIVER