

2. Kirkland & Ellis may have performed services in the past and may perform services in the future, in matters unrelated to the Debtors' above-captioned chapter 11 cases (the "**Chapter 11 Cases**"), for persons that are parties in interest in the Chapter 11 Cases. As part of its customary practice, Kirkland & Ellis is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants, employees of the Debtors, or other parties in interest in the Chapter 11 Cases. Other than as set forth herein in paragraph 4 below, Kirkland & Ellis does not perform services for any such person in connection with the Chapter 11 Cases. In addition and other than as set forth herein, Kirkland & Ellis does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

3. Neither I nor any principal of or professional employed by Kirkland & Ellis has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of Kirkland & Ellis.

4. In August 2012, certain holders (the "**Ad Hoc Group**") of the \$1.1 billion unsecured Murabaha, Shari'ah-compliant syndicated facility, dated as of March 28, 2007, issued by Arcapita Bank B.S.C.(c) (the "**Syndicated Facility**") engaged Kirkland & Ellis, to represent the Ad Hoc Group (not the individual members) in connection with the Chapter 11 Cases. The members of the Ad Hoc Group hold claims or manage certain funds that hold claims against the Debtors' estates arising from the Syndicated Facility, including claims in respect of a guarantee of the Syndicated Facility. Out of an abundance of caution, Kirkland & Ellis has established a screen between the attorneys who may perform services for the Debtors or their non-debtor affiliates as "ordinary course professionals" and the attorneys representing the Ad Hoc Group in the Debtors' Chapter 11 Cases.

5. K&E International has filed proofs of claim against each of the Debtors in the amount of \$382,030 for prepetition services.¹

6. Kirkland & Ellis is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if Kirkland & Ellis should discover any facts bearing on the matters described herein, Kirkland & Ellis will supplement the information contained in this supplemental affidavit.

7. Prepetition claims against any of the Debtors held by K&E International:

- a. Amount of claim: \$382,030
- b. Date claim arose: Various
- c. Source of claim: Legal fees incurred as a result of advice given in relation to several matters.

8. Prepetition claims against any of the Debtors held individually by any member, associate, or professional employee of Kirkland & Ellis: None.

9. Stock of any of the Debtors currently held by Kirkland & Ellis: None.

10. Stock of any of the Debtors currently held individually by any member, associate, or professional employee of Kirkland & Ellis: None.

11. Disclose the nature and provide a brief description of any interest adverse to the Debtors or their estates with respect to the matters on which Kirkland & Ellis is to be employed:

As disclosed above, Kirkland & Ellis attorneys are not employed in any matters adverse to the Debtors or their estates; however, certain Kirkland & Ellis attorneys represent the Ad Hoc Group

¹ This figure includes services provided by K&E International to the Debtors through March 18, 2012. This figure was derived using the exchange rate for the euro and the United Kingdom pound on March 19, 2012, the petition date for the Debtors, except for Falcon Gas Storage Co, which had a petition date of April 30, 2012. The figure for services provided by K&E International to the Debtors through April 29, 2012, is \$424,280.71. This figure was derived using the exchange rate for the euro and United Kingdom pound on April 30, 2012.

in unrelated matters in the Chapter 11 Cases, which matters could become adverse to the Debtors in the future. As noted, Kirkland & Ellis has established a screen between the attorneys who may perform services for the Debtors or their non-debtor affiliates as “ordinary course professionals” and the attorneys representing the Ad Hoc Group.