

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

In re:	§	Chapter 11
	§	
HII TECHNOLOGIES, INC., <i>et al.</i>¹	§	15-60070 (DRJ)
Debtors	§	(Jointly Administered)

DEBTORS' AMENDED WITNESS AND EXHIBIT LIST

HII Technologies, Inc. (“HII”) and its above-captioned affiliated debtors (collectively, the “Debtors”), hereby designate the following witnesses and exhibits in connection with the continuation of the Show Cause hearing before this Court on October 19, 2015, beginning at 12:30 p.m.

WITNESSES

1. Loretta Cross, CRO;
2. Margaret Ceconi;
3. Hugh M. Ray, III;
4. Calen Baucom, former employee (adverse);
5. Any witness identified or called by another party or by the Court; and
6. Any witnesses necessary to rebut the testimony of witnesses called or designated by any other party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: (i) Apache Energy Services, LLC (4404); (ii) Aqua Handling of Texas, LLC (4480); (iii) HII Technologies, Inc. (3686); (iv) Sage Power Solutions, Inc. fka KMHVC, Inc. (1210); and (v) Hamilton Investment Group, Inc. (0150).

EXHIBITS

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
1.	August 21, 2015 email exchange between LHB and AES containing invoice from August 1 – August 14, 2015 (including all attachments)					
2.	September 1, 2015 email from Calen Baucom to Margaret Ceconi sending “TICKETS 8-1 THRU 8-14” to Occidental Permian Ltd (“OXY”) (including all attachments)					
3.	September 15, 2015 email from Margaret Ceconi to Bill Green regarding Enterprise vehicles (including all attachments)					
4.	September 22, 2015 email from Loretta Cross regarding turning over documents					
5.	September 22, 2015 email exchange between Margaret Ceconi and Bill Green regarding Court Order to return equipment (including all attachments)					
6.	September 29, 2015 email exchange between Loretta Cross and Marc Manuel of Magna regarding Magna’s investment and AR tickets					
7.	Order in Aid of Administration of the Case (docket no. 33)					
8.	Order to Appear and Show Cause (docket no. 56)					
9.	Order (docket no. 158)					
10	AES Bank Statement from JPMorgan Chase Bank (“Chase”) regarding account xxx9250, for the period August 1, 2015 through August 31, 2015					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
11	Apache Energy Services General Ledger (July 1, 2015 – September 30 – 2015)					
12	Certificate of Formation, LHB Energy Consultants, LLC, filing date July 25, 2014, Calen Baucom, Managing Member					
13	Chase deposit receipt for \$110,927.00 (cash amount), dated August 21, 2015, transaction #255, into account number ending xxx6716					
14	HII Technologies General Ledger (July 1, 2015 – September 30, 2015)					
15	HII General Ledger, July 1, 2015 – September 30, 2015					
16	September 18, 2015 HII vehicle demand to C. Baucom					
17	September 17, 2015 HII vehicle demand to B. Cox					
18	September 17, 2015 HII vehicle demand to B. Mulliniks					
19	August 11, 2015 (0318p) email from E. Cox regarding HII vehicle, including attachments if applicable					
20	August 17, 2015 (0149p) email from B. Cox regarding HII vehicle, including attachments if applicable					
21	Emails of Brent Mulliniks, including attachments if applicable					
22	Emails of Calen Baucom, including attachments if applicable					
23	Emails of Bobby Cox, including attachments if applicable					
24	Emails of Pete Baldwin, including attachments if applicable					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
25	Email from K. Kennedy to H. Ray, III regarding equipment delivered					
26	Email dated October 5, 2015, from Brent Mulliniks to Loretta Cross regarding "AES Equipment Information," including attachments if applicable					
27	Declaration of Hugh M. Ray, III (docket no. 158)					
28	Any exhibit submitted by any other party.					
29	Any rebuttal or impeachment exhibit.					

The Debtors reserve the right to ask the Court to take judicial notice of pleadings and transcripts and/or documents filed in or in connection with these bankruptcy cases. The Debtors reserves the right to supplement or amend this Witness and Exhibit List prior to trial.

Designation of any exhibit does not waive any objection the Debtors may have to any exhibit listed on any other party's exhibit list.

Dated: October 15, 2015.

McKool Smith, P.C.

By: /s/ Hugh M. Ray, III
 Hugh M. Ray, III
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***Proposed Counsel for the Debtors and
 Debtors-in-Possession***

CERTIFICATE OF SERVICE

The undersigned certifies that on October 15, 2015, a true and correct copy of this document was served via the ECF system to the parties on the ECF service list, including the United States Trustee, and the pleading is being delivered to the Noticing Agent for service upon the parties on the Master Service List.

/s/ Hugh M. Ray, III

Hugh M. Ray, III