

**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' JOINDER TO LIMITED RESPONSE OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO EXPEDITED
MOTION TO EXTEND 90-DAY CHALLENGE DEADLINE
(Refers to Dkt. Nos. 280, 311)**

The Honorable David R. Jones, United States Bankruptcy Judge:

HII Technologies, Inc. ("HII") and its above-captioned affiliated debtors (collectively, the "Debtors"), file this Joinder to Limited Response of the Official Committee of Unsecured Creditors (Docket No. 311, "UCC Response") to the Ad Hoc Committee's² Expedited Motion to Extend 90-Day Challenge Deadline of the Ad Hoc (Docket No. 280, the "Motion"), and respectfully state as follows:

The Debtors: (i) reject the unsupported allegations set forth in the Motion; and, (ii) object to the relief sought in the Motion to the extent it constitutes an "Event of Default" as set forth in the *Final Order Approving the Debtors' Emergency Motion for Entry of Interim and Final Orders: (I) Authorizing Postpetition Financing, (II) Authorizing Use of Cash Collateral, and (III) Granting Adequate Protection to the DIP Lenders* (Docket No. 149).

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).

² The Ad Hoc Committee consists of the following trade creditors and former employees of Apache Energy Services, Inc. who hold unsecured claims against debtor AES: One Flow Energy Services, LLC, Black Gold Energy LLC, Fields Water Services, LLC, Brent Mulliniks, and Billy Cox.

Dated: January 4, 2016.

McKool SMITH, P.C.

By: /s/ Benjamin W. Hugon
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CERTIFICATE OF SERVICE

The undersigned certifies that on January 4, 2016, 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/ Benjamin W. Hugon
Benjamin W. Hugon