

MARKUS WILLIAMS
YOUNG & HUNSICKER LLC

Attorneys at Law

COLORADO • WYOMING

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www.MarkusWilliams.com

Bradley T. Hunsicker

307 778 8178

bhunsicker@markuswilliams.com

May 4, 2021

VIA E-MAIL (jrimmasch@wrrc.us)

Wasatch Railroad Contractors
c/o John Rimmasch
PO Box 20425
Cheyenne, WY 20425

Re: Engagement of Markus Williams Young & Hunsicker, LLC

Dear John:

This letter will confirm the terms upon which Markus Williams Young & Hunsicker, LLC ("Markus Williams") has agreed to act as legal counsel for Wasatch Railroad Contractors (the "Client"). We have agreed to act as counsel for Client in connection with prospective restructuring of Client's financial affairs and providing strategic alternatives and guidance to address Client's outstanding liabilities. Services shall include, but not be limited to, examining and evaluating Client's existing assets and liabilities, and generally, reviewing and analyzing Client's financial condition. We anticipate being involved in negotiations with Client's creditors, and specifically, McCreary County Heritage Foundation, Inc., in connection with efforts to reach consensual resolution of matters. Our representation of Client is limited in scope. At this point, we have not agreed to commence any litigation on Client's behalf, or defend any litigation that has been, or may be, initiated against the Client. Additionally, we have not agreed to file a petition under the Bankruptcy Code on the Client's behalf. In the event that Client ultimately desires to retain Markus Williams for purposes of litigation, filing a petition under the Bankruptcy Code, or additional services outside of the scope of this agreement (the "Engagement Letter"), such representation would be subject to a new agreed upon engagement letter and payment of an additional retainer.

Client will be billed for our fees and expenses on a regular monthly basis and billings will be supported by detailed invoices showing the time spent on each matter and the hourly rate applied to each matter. Our firm's bills are due and payable upon receipt. The range of hourly rates for attorneys at our firm is between \$275 and \$525. Paralegals are billed at the rate of \$125 per hour. My hourly rate is currently \$350. Hourly rates are subject to change, review and adjustment by our firm as a matter of firm policy. As our firm's hourly rates are changed, you will be promptly advised and thereafter billed at those rates. Other attorneys and paralegals within the firm may also perform services for you, as necessary, in the future. In addition to our fees for legal services, Client will be responsible for all costs incurred on its behalf. Typical costs

include photocopying, telecopy charges, record searches, computerized research, filing fees and the like. All such costs incurred on Client's behalf will be billed at our actual cost. By execution of this Engagement Letter, Client authorizes us to incur those costs which we deem reasonably necessary to adequately perform the legal services described in this Engagement Letter on Client's behalf.

In connection with our representation of Client, we are to receive payment of a security retainer in the amount of \$7,500. Client has agreed that this security retainer is fair, reasonable and necessary given the nature of services to be performed by us. Each month we will apply the retainer to accrued time and Client agrees that it will advance such sums to keep the retainer at \$7,500 unless otherwise agreed to by Markus Williams. The retainer will be applied to billings on the matters and any sums remaining in the retainer, if any, not applied to the payment of our fees and costs will be returned to Client at the completion of the representation.

We may stop performing legal services for and withdraw from our representation of Client's interests for failure to pay our bills in full and timely manner or failure to follow any recommendations or advice we may render. Likewise, should any conflict of interest arise in our representation of Client's interests, we may be required to withdraw our representation and Client may need to obtain new counsel. I hope you understand these protections are necessary for our firm in order for our firm to devote the necessary resources to a matter of this type.

During our representation of Client's interests, we may generate, receive or accumulate various documents. Upon Client's request, prior to the closing of our file for this representation, we will forward to Client all important original documents accumulated by us. Within three (3) years after closing the file, all materials in our files (except for important original documents) may be destroyed with or without being electronically stored and without further notice to Client or any other party.

I believe the foregoing accurately sets forth the arrangements for our firm's representation of Client. There are no other representations or promises other than as expressly set forth herein. If this letter meets Client's approval, I would appreciate that Client execute the acknowledgment set forth below and return it to our firm along with the \$7,500 retainer. Until and unless we receive this signed Engagement Letter and the \$7,500 retainer, we will not be responsible for undertaking any actions on Client's behalf.

Do not hesitate to contact me if you have any questions on this matter.

Sincerely,

MARKUS WILLIAMS YOUNG & HUNSICKER,
LLC



Bradley T. Hunsicker

ACKNOWLEDGMENT

The undersigned has read the above Engagement Letter and acknowledges that it correctly sets forth the arrangement for the retention of Markus Williams Young & Hunsicker, LLC for handling the matters set forth above, and hereby agrees to the terms and conditions set forth in the preceding Engagement Letter on this 11th day of May, 2021.

11th day of June, 2021.

CLIENT:

Wasatch Railroad Contractors

A handwritten signature in blue ink, appearing to be "J. E. Hunsicker", is written over a horizontal line.

By:

**United States Bankruptcy Court
District of Wyoming**

In re **Wasatch Railroad Contractors**

Debtor(s)

Case No.

Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Becky L. Rimmasch 831 Shadow Mountain Trail Cheyenne, WY 82009		1	Share Holder
John E. Rimmasch 831 Shadow Mountain Trail Cheyenne, WY 82009		99	Share Holder

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **CEO** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **September 14, 2021**

Signature **/s/ John E. Rimmasch**

John E. Rimmasch

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.*

**United States Bankruptcy Court
District of Wyoming**

In re **Wasatch Railroad Contractors**

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the CEO of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **September 14, 2021**

/s/ John E. Rimmasch

John E. Rimmasch/CEO

Signer/Title

A & K Services
11600 Milwaukee St
Thornton, CO 80233

A&K Railroad & Materials Inc
1505 S Redwood Rd
Salt Lake City, UT 84104-5106

A. Stucki Company
PO Box 6108-005
Hermitage, PA 16148

A.D. Martin Lumber Company
PO Box 1729
Riverton, WY 82501

Abrasive Blast Supply, Inc
ABS Supply
15480 17th Ave NE
Little Falls, m 56345

Abrasive Sales
PO Box 70
Mills, WY 82644

Absaroka Heating & Air
520 East Main Street
Riverton, WY 82501

Aero Transportation Products, Inc
3300 E. GeoSpace Drive
Independence, MO 64056

AFLAC
1932 Wynnton Road
Columbus, GA 31999

Airgas USA, LLC
Riverton Store
PO Box 734671
Dallas, TX 75373-4671

Airgas USA, LLC
Airgas USA, LLC
PO Box 532609
Atlanta, GA 30353-2609

Altranstek
1101 W. 31st Street, Suite 200
Downers Grove, IL 60515

Altus Receivables Management
2400 Veterans Blvd., Suite 300
Kenner, LA 70062

American Arbitration
2200 Century Parkway
Atlanta, GA 30345

American Railcar Industries, Inc
100 Clark Street
St. Charles, MO 63301-2075

ASME
Accreditation/Certification Dept
150 Clove Road, 6th Floor
Little Falls, NJ 07424

Atlas Roofing
PO Box 1208
Thermopolis, WY 82443

Austin W. Rigler
1714 Willow Drive
Cheyenne, WY 82001

Axalta Coating Systems, LLC
DEPT 3490
PO Box 3490
Carol Stream, IL 60132-3490

Bailey Oil Co.
813 South Federal Blvd.
Riverton, WY 82501

Bailey Stock Harmon Cottam P.C.
221 East 21st Street
Cheyenne, WY 82003-1557

Bailey Tire
PO Box 1326
Riverton, WY 82501

Bart A. Vroman
PO Box 522
Shoshoni, WY 82649

Becky L. Rimmasch
831 Shadow Mountain Trail
Cheyenne, WY 82009

Benveo
ATTN: Karla Leclaire
2431 E. 61st Street Suite 300
Tulsa, OK 74136

BIG HORN COOP MARKET
PO BOX 591
Greybull, WY 82426-0591

Bighorn Divide & Wyoming Railroad
601 East 1st St
Shoshoni, WY 82649

Black Hills 058
Black Hills Energy
P.O. Box 6001
Rapid City, SD 57709-6001

Black Hills 233
Black Hills Energy
P.O. Box 6001
Rapid City, SD 57709-6001

Black Hills 882
Black Hills Energy
P.O. Box 6001
Rapid City, SD 57709-6001

Black Hills Energy
P.O. Box 6006
Rapid City, SD 57709

Blast Products, Inc.
Blast Products, Inc.
820 No. Warm Springs Rd
Salt Lake City, UT 84116

Brendan C. Pase
651 Ridgeland St
Cheyenne, WY 82009

BTI Railcar Repair, Inc.
601 E. 1st Street
P.O. Box 387
Shoshoni, WY 82649

Bureau Veritas - OneCIS Insurance
Bureau Veritas - OneCIS Insura
PO Box 277908
Atlanta, GA 30384-7908

Camoria J. Luce
307 Miller Lane
Cheyenne, WY 82009

Capital Lumber
1222 Dunn Ave
Cheyenne, WY 82001

Carboline Company
2150 Schuetz Rd
St. Louis, MO 63146

Carole's Commercial Cleaning
1532 Mulberry Street
Fort Collins, CO 80524

Charter Comm
Spectrum Business
PO Box 742614
Cincinnati, OH 45274-2614

Christina A. Lawson
114 E. 6th St.
Lot #16
Shoshoni, WY 82649

Colorado Metallurgical Services, Inc
10605 E 25th Avenue
Aurora, CO 80010

Colton D. Dudley
12 Haymaker Rd
Riverton, WY 82501

Comet Industries
Comet Rail Products
2301 Burlington Street
N. Kansas City, MO 64116

Comet Rail Products, Inc
2301 Burlington St
North Kansas City, MO 64416

Cully J. Richard
9 Cross Hill Rd
Cape Elizabeth, ME 04107

Dallas J. Mitchell
631 A. West Adams
Riverton, WY 82501

Daniel Lee
5021 Timberline Rd
Cheyenne, WY 82009

Daniel R. Conway
303 Maple St
Shoshoni, WY 82649

David Varley
3130 Alpine Rd
Portola Valley, CA 94208

Delta Dental Plan of Wyoming
6705 Faith Drive
Cheyenne, WY 82009

Domanico Reporting, Inc
565 Madison Point Drive
Lexington, KY 40515

Eagle Gasket & Packaging
1110 Ulrich Road
Tomball, TX 77375

Erron M. Hopkins
5361 Atlantic Dr
Cheyenne, WY 82001

Estate of Daniel Conway
c/o Aaron J. Vincent
Vincent Davey Law Firm
301 E Adams Ave.
Riverton, WY 82501

Ethan D. Harris
1168 Kaycee Pl
Cheyenne, WY 82009

ETrade Investment Account
P.O. Box 484
Jersey City, NJ 07303-0484

Farmers Insurance
3553 Ridge Road
Cheyenne, WY 82001

Farmers New World Life Insurance Compan
3003 77th Ave SE
Mercer Island, WA 98040

Fast Lane, Inc
110 W. Second P.O. Box 540
Shoshini, WY 82649

Fastenal Co
P.O. Box 978
Winona, MN 55987-0978

First Flare and Repair, LLC
6551 S. Revere Pkwy
Centennial, CO 80111

First Interstate Bank
PO Box 31295
Billings, MT 59107

First Interstate Bank
401 West 19th Street
Cheyenne, WY 82001

Flanders Electric Motor Service, Inc
PO Box 75176
Chicago, IL 60675-5176

Frontier Heat Treating, LLC
PO Box 2031
Evanston, WY 82931-2031

Gary's Paint & Restoration
424 Parsley Blvd
Cheyenne, WY 82007

Gerardo Rico
320 Big Bend
Riverton, WY 82501

GLNX
2201 Timberloch Place, Suite 1
The Woodlands, TX 77380

Greenbrier Rail Services LLC
13810 Collections Center Drive
Chicago, IL 60693

Gulf Coast Bank and Trust Company
5949 Sherry Lane, Suite 785
Dallas, TX 75225

Gulf Coast Building
Gulf Coast Small Business Lend
5949 Sherry Ln, Ste. 785
Dallas, TX 75225

Gulf Coast Refi
5949 Sherry Lane
Suite 785
Dallas, TX 75225

Hagan D. Allen
830 Shoshoni St
Cheyenne, WY 82009

High Mountain Inspection Service, Inc
PO Box 1508
Mills, WY 82644-1508

HMBD Insurance Services, Inc.
3633 E. Broadway #200
Long Beach, CA 90806

Holmes A-1 Rental
2105 Morrie Ave
Cheyenne, WY 82001

Hopper Disposal Inc
483 Bonneville Rd
Shoshini, WY 82649-0273

Hoppermetals Inc
PO Box 273
Shoshini, WY 82649

Hub Group
PO Box 95045
Chicago, IL 60694-5045

Hunter T. Reinking
4689 Horizon Loop
Cheyenne, WY 82009

Intsel Steel West
Intsel Steel West - Denver
PO Box 301212
Dallas, TX 75303-1212

Jacob B. Lee
3312 Forest Dr
Cheyenne, WY 82001

Jarrold W. Hambrick
216 Heather Drive
Riverton, WY 82501

Jason P. Hernandez
304 S. 6th St E
Riverton, WY 82501

Jeffery M Bradshaw, CPA
175 North Main #201
Heber, UT 84032

John E. Rimmasch
831 Shadow Mountain Trail
Cheyenne, WY 82009

Jonah Bank of Wyoming
205 Storey Blvd
Cheyenne, WY 82009

Khristopher D. Jacobs
505 Ryan St
Thermopolis, WY 82443

Kinthead & Stilz
301 E. Main Street, Suite 800
Lexington, KY 40507

Koprince Law
901 Kentucky St, Suite 301
Lawrence, KS 66044

Liberty Rail Services, Inc.
3323 Waco Street
Texarkana, TX 75501

Mallory Safety & Supply
PO Box 2068
Longview, WA 98632

McCreary County Heritage Foundation
c/o James O. Bardwell
Woodhouse Roden Nethercott, LLC
1912 Capitol Avenue, Ste. 500
Cheyenne, WY 82001

McMaster Carr
PO Box 7690
Chicago, IL 60680-7690

Michael E. Lewis
715 Ranger Drive
Cheyenne, WY 82009

Midland Manufacturing Corporation
7733 Gross Point Road
Skokie, IL 60077

Miner Enterprises Inc
37659 Eagle Way
Chicago, IL 60678-1376

Mistras
Mistras Group Inc.
P.O. Box 405694
Atlanta, GA 30384-5694

MISTRAS Group, Inc.
MISTRAS Group, Inc.
4117 S. Valley Dr. Unit 100
Longmont, CO 80504

Mountaineer Distributors, LLC
PO Box 397
Poca, WV 25159

Napa Auto Parts
The Rocky Mountain Group Inc.
201 S. Federal Blvd
Riverton, WY 82501

Napa Genuine Parts of Cheyenne, Inc.
PO Box 9
Cheyenne, WY 82003

National Board Boiler & Pressure Vessel
Accounting Department
1055 Crupper Avenue
Columbus, OH 43229

Norco Inc.
PO BOX 413124
Salt Lake City, UT 84141-3124

Norco Inc.
709 West Main Street
Riverton, WY 82501

O'Reilly Auto Parts
P.O. Box 9464
Springfield, MO 65801-9446

Pacific Steel & Recycling
PO Box 160
Mills, WY 82644

Pepper Tank & Contracting
PO Box 1468
Casper, WY 82602

Pittsburgh Air Brake Co Inc
401 Main Street
Bentleyville, PA 15314

RailTech Software Systems
521 Hermosa Way
Oxnard, CA 93036

Rampart Range Corporation
805 Kenosha Drive
Larkspur, CO 80118

Range
PO Box 506
Worland, WY 82401-0506

Range
130 South 9th Street
Worland, WY 82401

RAS Data Services, inc.
1510 Playfield Road Suite 3
Darien, IL 60561

Revelation Steel, LLC
1324 N. 7th Ave
Greeley, CO 80631

Richard S. Prescott
720 Custer St
Cheyenne, WY 82009

Riverton Ace Hardware
619 N. Federal
Riverton, WY 82501

RLR Certified Public Accountants & Advi
1235 Riverside Ave.
Fort Collins, CO 80524

Rocky Mountain Fire Systems, Inc.
Rocky Mountain Fire Systems, I
340 N Ash St
Casper, WY 82601-1808

Rocky Mountain Power
PO BOX 26000
Portland, OR 97256-0001

Rocky Mountaintain Air Solutions
Dept. 78716
PO Box 78000
Detroit, MI 78278-0716

Roxky Mountain Power
1407 W. North Temple
Salt Lake City, UT 84116

Salco Products Inc
PO Box 6108-5121
Hermitage, PA 16148-0922

Schoonover & Moriarty LLC
130 N. Cherry Street
Ste. 202
Olathe, KS 66061

Scott L. Taylor
20 Boysen Route
PO Box 475
Shoshoni, WY 82649

Sedera
7171 Southwest Parkway
Building 300, Suite 350
Austin, TX 78735

Sharon M. Taylor
P.O. Box 475
Shoshoni, WY 82649

Sign Warehouse
2614 Texoma Dr
Denison, TX 75020

Solvay Chemicals
PO BOX 65
Weimer, TX 78962

Southwest Industrial Rigging
2802 West Palm Lane
Phoenix, AZ 85009

Southwest Rail Industries
Bill Fluker
PO Box 65
Weimar, TX 78962

Spectrum/Charter Communications
400 Atlantic Street
Stamford, CT 06901

Stephen A. Lee
8912 East Pershing Blvd
Cheyenne, WY 82009

Strato
100 New England Ave
Piscataway, NJ 08854

Sundowner Station
1616 North Federal Blvd
Riverton, WY 82501

Superior Glass
821 E Lincolnway
Cheyenne, WY 82001

Town of Shoshoni
P.O. Box 267
Shoshoni, WY 82649

Transportation Technology Center, Inc.
P.O. Box 79780
Baltimore, MD 21279-0780

TransQuip USA Inc
3360-C Lake Shore Blvd
Jacksonville, FL 32210

Trinity Chemical Industries
PO Box 1403
Lowell, AR 72745

Trinity Parts & Components, LLC
PO Box 732666
Dallas, TX 75373-2666

Trinity Railcar
14221 North Dallas Parkway, Ste 1100
Dallas, TX 75254

United Rentals
PO Box 840514
Dallas, TX 75284-0514

US Bank
1437 Prairie Avenue
Cheyenne, WY 82009

US Bank Chevy
PO Box 790179
St. Louis, MO 63179-0179

Verizon Wireless
PO Box 660108
Dallas, TX 75266-0108

Verizon Wireless
140 West Street
New York, NY 10007

VSP of Wyoming
PO Box 742683
Los Angeles, CA 90074-2683

VSP Technologies
PO Box 76416
Baltimore, MD 21275-6416

Wabtec Global Services
2665 Reliable Parkway
Chicago, IL 60686

Ward L. Gordon
PO Box 23
Pavillion, WY 82523

Welding & Machine
PO Box 1105
Cheyenne, WY 82003

Welford Industries
James M. Garner
Cheyenne, WY 82001

Wells Fargo Bank
1701 Capitol Avenue
Cheyenne, WY 82001

Wesley J. Rimmasch
831 Shadow Mountain Trail
Cheyenne, WY 82009

Western Specialty Manufacturing Corp
1812 Pacific Avenue
Cheyenne, WY 82007

Western Steel and Boiler Company
4751 Fox St
Denver, CO 80216

Western Steel Inc.
PO Box 15968
Colorado springs, CO 80935

Work Wise
1005 College View Drive
Riverton, WY 82501

WyHy FCU
PO Box 20050
Cheyenne, WY 82003-7001

WyHy Federal Credit Union
1715 Stillwater Avenue
Cheyenne, WY 82009

Wyo Dept of Workforce Services
PO Box 2760
Casper, WY 82602-2760

Wyoming Mechanic Services LLC
8407 Aztec Dr
Cheyenne, WY 82009

Wyoming Salvage
2222 Snyder Avenue
Cheyenne, WY 82001

Wyoming Steel F & E
721 County Rd 128A
Cheyenne, WY 82007

WZNN Properties LLC
William & Nancy Ketcham
PO Box 169
Cheyenne, WY 82003

**United States Bankruptcy Court
District of Wyoming**

In re **Wasatch Railroad Contractors**

Debtor(s)

Case No.

Chapter

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Wasatch Railroad Contractors** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [*Check if applicable*]

September 14, 2021

Date

/s/ Bradley T. Hunsicker

Bradley T. Hunsicker 7-4579

Signature of Attorney or Litigant

Counsel for **Wasatch Railroad Contractors**

Markus Williams Young & Hunsicker LLC

2120 Carey Avenue, Suite 101

Cheyenne, WY 82001

(307) 778 8178 Fax:(307) 778 8953

bhunsicker@markuswilliams.com