

**MARKUS WILLIAMS**  
YOUNG & HUNSICKER LLC  
*Attorneys at Law*

COLORADO • WYOMING

2120 Carey Avenue · Suite 101 · Cheyenne WY 82001  
307 | 778 8178 ph · 303 | 830 0809 fx  
[www.MarkusWilliams.com](http://www.MarkusWilliams.com)

Bradley T. Hunsicker  
307 778 8178

[bhunsicker@markuswilliams.com](mailto:bhunsicker@markuswilliams.com)

May 4, 2021

VIA E-MAIL ([jrimmasch@wrrc.us](mailto: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 ~~\_\_\_ day of May, 2021.~~

*11th day of June, 2021.*

**CLIENT:**

Wasatch Railroad Contractors



A handwritten signature in blue ink, appearing to be 'J. Williams', is written over a solid 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
<b>Becky L. Rimmasch 831 Shadow Mountain Trail Cheyenne, WY 82009</b>		<b>1</b>	<b>Share Holder</b>
<b>John E. Rimmasch 831 Shadow Mountain Trail Cheyenne, WY 82009</b>		<b>99</b>	<b>Share Holder</b>

**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 Leclair  
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

Kinkead & 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 95601-9446

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**