

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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In the Matter of:

In Bankruptcy No.  
16-24179-BEH 11

**GREEN BOX NA GREEN BAY, LLC,**

Debtor.

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**AFFIDAVIT OF BRIAN NOWICKI**

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STATE OF WISCONSIN            )  
  ) ss.  
COUNTY OF DANE             )

Brian Nowicki, being first duly sworn under oath and penalty of perjury, deposes and states the following:

1. This affidavit is based upon my personal own knowledge, except as may be otherwise stated herein.
2. I am an adult resident of the State of Wisconsin, and am the current Chief Financial Officer at Wisconsin Economic Development Corporation (“WEDC”).
3. In my experience, training, and course of involvement with WEDC and otherwise, I know, among other things that:
  - a. Among other things, WEDC is engaged in the activities of, among other things, lending money and loan and grant servicing;
  - b. WEDC maintains files, histories, profiles, and ledgers for all of its borrowers, awards, and accounts that consist of both electronic and hardcopy media (collectively, “Records”);

- c. Among other things, the WEDC's Records identify the payments made and amounts due on each account for each borrower, award, and account;
- d. WEDC relies upon the promises and representations made by the persons in and the information contained in its Records;
- e. WEDC requires that the Records are created and maintained by an agent or employee of WEDC with personal knowledge of the facts contained therein at or near the time each particular transaction occurs and in the course of WEDC's regularly conducted activities for the purpose of ensuring accuracy and reliability; and
- f. I have personally created, maintained, accessed, and reviewed such Records in the course of WEDC's regularly conducted business activities and have found such Records to be accurate and reliable.

4. I have personally accessed and reviewed WEDC's Records as they relate to the Debtor in this case, Green Box NA Green Bay, LLC ("Debtor"); according to such Records, among other things:

- a. Attached hereto are true and correct copies of documentation received by WEDC from the Debtor prior to WEDC's joint commencement of Marco Araujo, MD, et al. v. Green Box NA, Green Bay, LLC, Brown County Circuit Court Case No. 15-CV-769, on May 20, 2015; and
- b. The amounts claimed by WEDC in and the documents attached to WEDC's proof of claim filed in this case are true and correct, and WEDC has received no money on said claim since its filing.

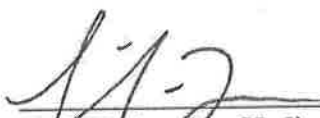
5. This Affidavit is made in support of WEDC's request for conversion to Chapter 7 filed herein.

**WISCONSIN ECONOMIC  
DEVELOPMENT CORPORATION**

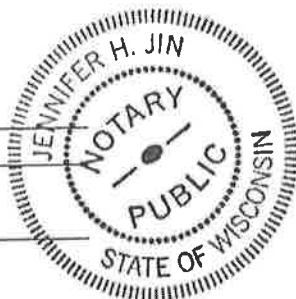


By: Brian Nowicki, its Chief Financial Officer

Subscribed and sworn to before me this  
20th day of November, 2017.



NAME: Jennifer H. Jin  
Notary Public, State of Wisconsin  
My Commission: Permanent



27043.150595  
4835-5732-1302, v. 1



# GREEN BOX NA GREEN BAY, LLC SUMMARY BALANCE SHEET

As of June 30, 2014

## ASSETS

<b>CURRENT ASSETS</b>		
WORKING CAPITAL CASH PATRIOT	\$	314,972.49
ACCOUNTS RECEIVABLE	\$	1,503,894.69
NOTE RECEIVABLE	\$	2,000,000.00
INVENTORY	\$	1,071,703.48
<b>TOTAL CURRENT ASSETS</b>	\$	<b>4,890,570.66</b>
<b>PROPERTY, PLANT &amp; EQUIPMENT</b>		
NEW SORTING & PELLET EQUIPMENT	\$	4,484,000.00
NEW LIQUEFACTION EQUIPMENT	\$	910,100.00
CARGILL EQUIPMENT AGREEMENT	\$	1,810,722.00
OIL & PELLET SYSTEM	\$	1,003,796.00
COTTON EQUIPMENT	\$	3,341,600.00
SORTING SYSTEM	\$	1,244,000.00
AFTER DRYER SYSTEMS (6 SETS) NEW	\$	26,272,000.00
RAR ASSETS	\$	6,502,900.00
BRETTINGS	\$	6,410,000.00
PATRIOT BLDG, EQUIP & SELLER NOTES	\$	15,000,000.00
<b>TOTAL PROPERTY, PLANT &amp; EQUIPMENT</b>	\$	<b>66,979,118.00</b>
<b>PATENTS &amp; INTELLECTUAL PROPERTY</b>		
FDA APPROVED PC CUPS RECLAMATION TO NEW CUPS	\$	4,430,000.00
TRADEMARKS	\$	2,162,000.00
ROYALTY LICENSING AGREEMENTS-GB NA/GB INT I&II	\$	15,000,000.00
TRAINING SYSTEMS & MATERIALS	\$	740,000.00
RAR SURFACE & WASTE WATER INTELLECTUAL PROPERTIES	\$	2,880,000.00
TISSUE SALES & MARKETING AGREEMENTS	\$	1,990,000.00
TECH FOR SPECIALTY CUP 40% PRODUCTION WITH EFA	\$	3,712,800.00
TECH FOR TISSUE DRYING	\$	1,640,000.00
TECH FOR 100% RECLAMATION	\$	3,667,724.00
TECH FOR 100% SUSTAINABILITY	\$	3,667,274.00
TECH FOR DISSOLVING PULP	\$	1,220,000.00
TECH FOR COTTON VISCOSE PULP	\$	2,450,000.00
TECH FOR 100% P/C TISSUE PULP	\$	4,560,000.00
TECH FOR VIRGIN RECYCLE PULP MIX	\$	1,119,600.00
TECH FOR WET CREPE TISSUE	\$	4,179,000.00
TECH FOR DRY CREPE TISSUE	\$	4,179,000.00
TECH FOR 380 GRADES IP 100% P/C TISSUE	\$	2,220,000.00
TECH FOR PROLYSIS/LIQUEFACTION	\$	3,280,000.00
TECH FOR ASTM 975 DIESEL FUEL DISTILLATION	\$	1,880,000.00
TECH FOR ELECTRICITY FROM SYNGAS	\$	1,880,000.00
TECH FOR BIO CHAR - SLUDGE - SOIL ENHANCEMENT	\$	1,880,000.00
TECH FOR CARGILL EFA	\$	14,231,000.00
TECH FOR ZERO WASTE WATER DISCHARGE 100% P/C PULP	\$	2,000,000.00
TECH FOR ZERO WASTE WATER DISCHARGE 100% P/C TISSUE	\$	2,000,000.00
WASTE LIQUID TO ETHANOL SYSTEM	\$	9,200,000.00
GREEN BOX SYSTEM	\$	2,162,000.00
GREEN BOX DECANT & CHEMICAL APPLICATION SYSTEM	\$	2,000,000.00
GREEN BOX SATELLITE SYSTEM & ENVIRONMENTAL PERMITS	\$	2,000,000.00
COTTON LINER TISSUE PATENT	\$	2,450,000.00
40% P/C CUP & CARTON PULP WITH CARGILL EFA	\$	2,000,000.00
WASTE TIRE RECOVERY TO SYNGAS, BIO CHAR, BIOFUELS	\$	4,540,000.00

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EXHIBIT N-1



**GREEN BOX NA GREEN BAY, LLC  
SUMMARY BALANCE SHEET**

As of June 30, 2014

<b>TOTAL PATENTS &amp; INTELLECTUAL PROPERTY</b>	\$	111,320,398.00
<b>SUBHOLDING GROUPS ASSIGNED ASSETS</b>		
TISSUE TECH LLC HOLDING ASSIGNMENT S&M AGREEMENT	\$	19,175,000.00
OWNERSHIP GB DESIGN / EPC / TAK CASE	\$	65,371,241.00
WFRT OWNERSHIP 50%	\$	1,370,810.00
PCDI SUB LLC'S GBCB 60% OWNERSHIP	\$	8,747,970.75
<b>TOTAL SUBHOLDING GROUPS ASSIGNED ASSETS</b>	\$	94,665,021.75
<b>TOTAL ASSETS</b>	\$	277,855,108.41
<b><u>LIABILITIES &amp; STOCKHOLDERS' EQUITY</u></b>		
<b>CURRENT LIABILITIES</b>		
ACCOUNTS PAYABLE	\$	1,326,290.38
OLD PCDI EQUITY DEBT	\$	5,593,823.62
BRETTINGS FINANCING	\$	3,600,000.00
WORKING CAPITAL LOAN - BAYLAKE BANK	\$	682,098.24
VARDE PARTNER	\$	7,000,000.00
STEVE SMITH	\$	5,534,143.61
<b>TOTAL CURRENT LIABILITIES</b>	\$	23,736,355.85
<b>LONG-TERM LIABILITIES</b>		
STATE OF WISCONSIN	\$	1,116,000.00
CARGILL DEBT	\$	5,000,000.00
CLIFFTON GROUP	\$	2,000,000.00
MAPLE BRIDGE	\$	7,150,000.00
MEMBER CONTRIBUTION SUB DEBT RVDH FROM VHC	\$	65,000,000.00
RVDH SUB DEBT (INSTALLMENT)	\$	46,817,870.97
<b>TOTAL LONG-TERM LIABILITIES</b>	\$	127,083,870.97
<b>TOTAL LIABILITIES</b>	\$	150,820,226.82
<b>EQUITY</b>		
CASH EQUITY	\$	7,300,000.00
MEMBERS CONTRIBUTED EQUITY-STOCK FOR UNITS	\$	21,690,634.84
CORP EQUITY CONTRIBUTED ASSETS/STOCK FOR UNITS	\$	93,653,211.00
RETAINED EARNINGS - PRIOR	\$	2,242,081.00
RETAINED EARNINGS - CURRENT	\$	2,148,954.75
<b>TOTAL EQUITY</b>	\$	127,034,881.59
<b>TOTAL LIABILITIES &amp; STOCKHOLDERS' EQUITY</b>	\$	277,855,108.41

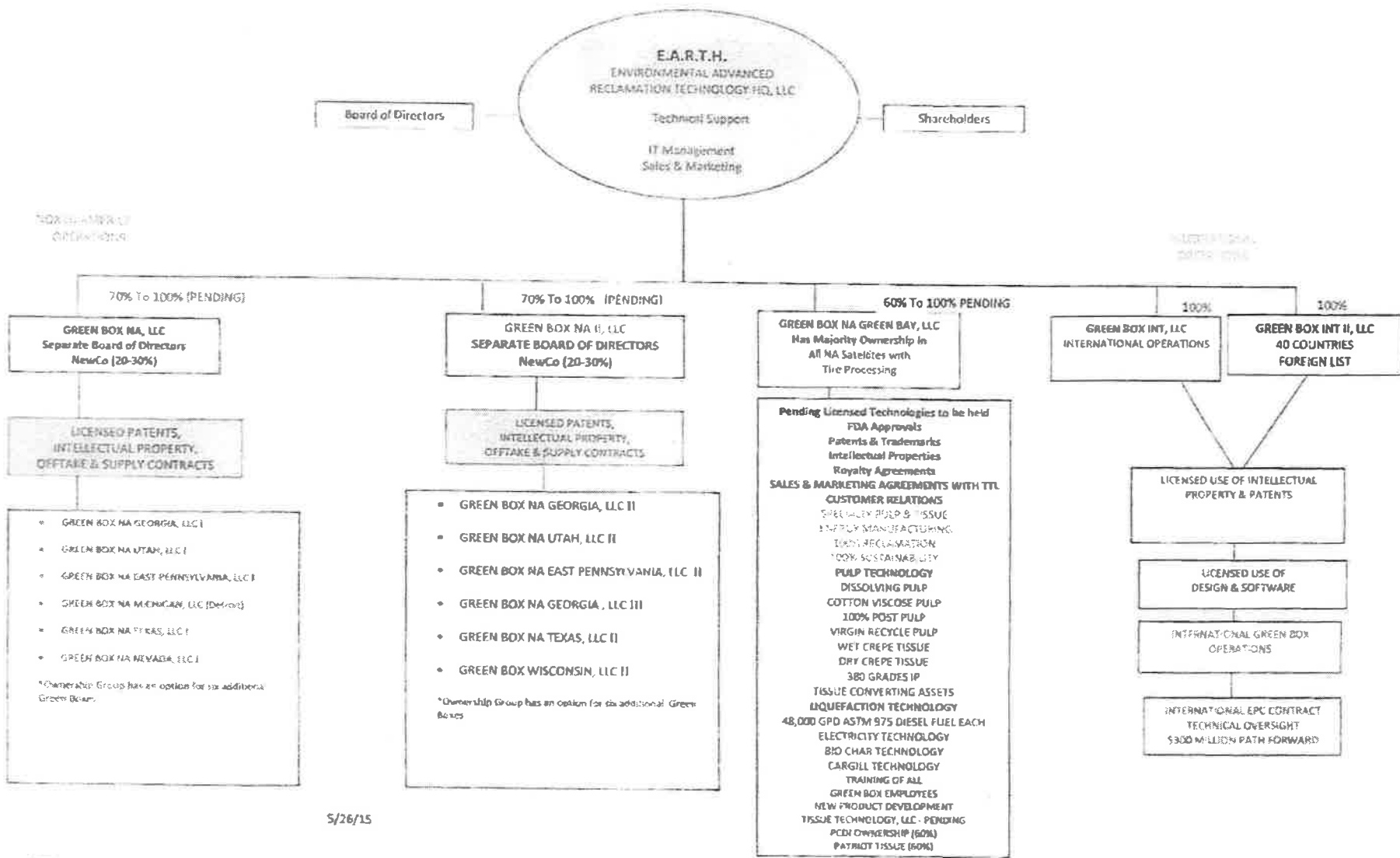
Patriot Tissue, LLC  
**SUMMARY BALANCE SHEET**  
 As of December 31, 2014

**ASSETS**

<b>CURRENT ASSETS</b>	
CASH	\$63,970
ACCOUNTS RECEIVABLE	880,588
INVENTORIES	831,148
PREPAID EXPENSES	144,104
	\$1,919,810
<b>PROPERTY, PLANT &amp; EQUIPMENT</b>	
PROPERTY, PLANT & EQUIPMENT	\$165,129
	\$165,129
<b>OTHER ASSETS</b>	
CAPITAL & AMORTIZATION	\$19,633
N/R GREEN BOX N.A. GB	978,222
PROCEEDS RECEIVABLE-SELLER NOTE ASSIGNMENT	13,921,465
	\$14,919,320
<b>TOTAL ASSETS</b>	\$17,004,259

**LIABILITIES & MEMBERS' EQUITY**

<b>CURRENT LIABILITIES</b>	
ACCOUNTS PAYABLE	\$1,100,917
OTHER PAYABLES	181,841
WAGES & TAXES PAYABLE	347,667
	\$1,630,425
<b>LONG TERM LIABILITIES</b>	
NOTE PAYABLE - GLENARBOR	\$645,534
OTHER LEASES	33,880
	\$679,414
<b>TOTAL LIABILITIES</b>	\$2,309,839
<b>MEMBERS' EQUITY</b>	
CONTRIBUTED EQUITY	\$13,272,570
ACCUMULATED DEFICIT - 2013	(138,549)
RETAINED EARNINGS - 2014	1,560,399
	\$14,694,420
<b>TOTAL LIABILITIES &amp; MEMBERS' EQUITY</b>	\$17,004,259



EXHIBIT

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