### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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IN RE:

ALEXANDER E. JONES

Debtor.

CASE NO. 22-33553

CHAPTER 7

## LIMITED JOINDER TO FUAC'S EXPEDITED MOTION: (I) REQUESTING LEAVE TO FILE MOTION APPROVING SALE OF FSS ASSETS, AND (II) REQUESTING STATUS <u>CONFERENCE</u>

WOW.AILLC ("<u>WOW</u>"), by and through its undersigned counsel, hereby files this limited joinder to the *Expedited Motion Requesting Leave to File Motion Approving the Sale of FSS Assets, and Request for Status Conference* [Docket No. 1089] (the "<u>Motion</u>") filed by First United American Companies, LLC ("FUAC"), and respectfully states as follows:

### **LIMITED JOINDER**

1. On February 13, 2025, WOW, an AI entertainment company,<sup>1</sup> submitted a bid to the Chapter 7 Trustee to purchase the FSS Assets in accordance with this Court's *Order Granting Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Docket No. 859] (the "<u>Winddown Order</u>").

2. On February 18, 2025, FUAC filed the Motion referenced above. FUAC's Motion reveals that FUAC remains interested in purchasing the FSS Assets, while ostensibly also supporting a competitive bidding process and auction that will provide an opportunity for other interested parties, such as WOW, to participate. If such auction were scheduled, the Chapter 7

<sup>&</sup>lt;sup>1</sup> WOW has no affiliation or relationship with either of the two previously disclosed bidders for the FSS Assets: FUAC, and Global Tetrahedron, LLC/the Connecticut Families. WOW does not know of the identity of any other potentially interested bidders at this time.

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Trustee would determine the party that has offered the greatest value to this estate through such process, subject to the Court's approval. *See* Motion, at  $\P$  7 ("Perhaps other parties are willing to offer more for the Assets if given the opportunity.").

3. As a bidder interested in the FSS Assets, WOW supports a transparent and straightforward sale process pursuant to established protocols, consistent with the Winddown Order (or newly established protocols as may be determined or required by the Court). Such a process would allow WOW, as well as other potentially interested parties, to understand and comply with all Court-ordered parameters of the sale. WOW supports FUAC's Motion only to the extent it seeks a fair, open, transparent, and competitive process. WOW suggests a process that would allow bidders to: (i) evaluate other bids, (ii) determine whether they are able to provide greater value to the estate through a topping bid, and (iii) submit such bids to the Trustee, together with information supporting the value of each prospective bid.

4. For the reasons set forth herein, WOW respectfully requests that this Court permit the Trustee or other appropriate party to seek approval of a process that includes appropriate and transparent protocols for the sale of the FSS Assets, consistent with the Winddown Order, section 363 of the Bankruptcy Code, and pursuant to this Court's supervision.

[Remainder of page intentionally left blank.]

Respectfully submitted,

Dated: February 26, 2025

## **MCKOOL SMITH, PC**

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Counsel to WOW.AI LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that on February 26, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ S. Margie Venus

S. Margie Venus