

2. I am the Vice-President and Chief Financial Officer of Bollinger Shipyards, Inc. ("Bollinger"), and I execute this affidavit on the basis of my personal knowledge and my review of records maintained in the regular course of Bollinger's business.
3. The Bollinger Plaintiffs in the above captioned matter are: Bollinger Shipyards, Inc., Bollinger Shipyards Lockport, L.L.C., Bollinger Algiers, L.L.C., Bollinger Amelia Repair, L.L.C., Bollinger Calcasieu, L.L.C., Bollinger Fourchon, L.L.C., Bollinger Larose, L.L.C., Bollinger Marine Fabricators, L.L.C., Bollinger Morgan City, L.L.C., Bollinger Quick Repair, L.L.C., Bollinger Texas City, L.L.C., and Bollinger Gretna, L.L.C., (collectively referred to herein as the "**Bollinger Shipyard Companies**") and Bee Mar LLC, Bee Mar Crews LLC, Bee Mar – Honey Bee LLC, Bee Mar – Worker Bee LLC, Bee Mar – Bayou Bee LLC, Bee Mar – Bumble Bee LLC, Bee Mar – Busy Bee LLC, Bee Mar – Bee Sting LLC, Bee Mar – Queen Bee LLC, and Bee Mar – Bee Hive LLC, (collectively referred to herein as "**Bee Mar Deepwater Vessel Companies**").
4. The Bollinger Shipyard Companies own and operate shipyards for the construction and repair of vessels and a significant part of their business is related to the construction and repair of vessels used to support Gulf of Mexico Outer Continental Shelf ("OCS") deepwater exploration and production activities.
5. The Bee Mar Deepwater Vessel Companies own and operate vessels that support Gulf of Mexico OCS deepwater exploration and production activities.
6. To conduct their business, Bee Mar Deepwater Vessel Companies typically contract with OCS oil and gas exploration and production companies under time charter agreements, which require them, for a given period of time, to provide vessels, as called for, to the exploration and production companies to assist in their drilling activities. Many of the

customers of Plaintiffs, Bee Mar Deepwater Vessel Companies hold permits that were affected by the industry-wide suspension imposed by the Moratorium and the NTL.

7. The Bollinger Shipyard Companies, have an aggregate of over 5,000 active vendors that buy equipment, products and services from vendors located in over forty states of the United States.
8. Bee Mar Deepwater Vessel Companies, in the aggregate have several thousand vendors in almost all the states of the United States and have multiple master time charter agreements and contracts with their customers in the deepwater Gulf of Mexico OCS. For example, as of April 20, 2010, the date of the Deepwater Horizon Incident, the vessels M/V Bumble Bee, M/V Busy Bee, M/V Bayou Bee and M/V Bee Sting were all on charter to large independent oil companies.
9. All of these time charter agreements are being negatively affected by the deepwater drilling Moratorium.
10. Bollinger Shipyard Companies derived approximately 50% of their business in 2009 from vessels being repaired and constructed to support Gulf of Mexico OCS deepwater exploration and production activities. The value of deepwater vessels built by Bollinger Shipyard Companies in the last five years is in excess of \$200,000,000. Bollinger Shipyard Companies have performed over 1,000 repairs to vessels that support Gulf of Mexico OCS deepwater exploration and production activities in 2008, 2009 and 2010.
11. On April 20, 2010, the Bee Mar Deepwater Vessel Companies derived almost 100% of their business from vessels that support deepwater exploration and production activities, with 72% of those vessels in the Gulf of Mexico.
12. Just over a week into the six-month deepwater drilling Moratorium, its effects on the

Gulf of Mexico OCS deepwater industry are real – there have been contract terminations and suspensions; deepwater rigs are pulling out of the Gulf to drill in international deepwater – and the industry is at, or at the very least, coming to a standstill. The Bollinger entities are planning to layoff longtime employees and severely reduce, if not eliminate, the use of contract employees. The Bee Mar Deepwater Vessel Companies will be required to lay off U.S. mariners and shore-based personnel if deepwater drilling opportunities do not return in the near future.

13. Given that 50% of the vessel repair and construction business conducted by Bollinger Shipyards Companies in 2009 related to vessels used to support Gulf of Mexico OCS deepwater exploration and production, the Moratorium is harming Bollinger Shipyards Companies' business in ways that are irreparable.
14. The vessels owned and operated by Plaintiffs, Bee Mar – Bayou Bee LLC and Bee Mar – Bee Sting LLC, were previously assigned to two Gulf of Mexico deepwater exploration and development projects and Plaintiffs now have been advised that their contracts are being canceled as a result of the Moratorium. The oil companies declared force majeure and released their drilling rigs in May of 2010.
15. As a result of the Moratorium and based on the contract cancellations and suspensions, the vessels, BEE STING and BAYOU BEE, owned and operated by Plaintiffs, Bee Mar – Bee Sting LLC and Bee Mar – Bayou Bee LLC, were released and placed “off hire” this week by their deepwater customer in the U.S. Gulf of Mexico.
16. The vessels owned and operated by Plaintiffs, Bee Mar – Bee Sting LLC and Bee Mar – Bayou Bee LLC, are now unable to return to their intended use in support of deepwater exploration activities under the Jones Act trade as a result of the Moratorium.

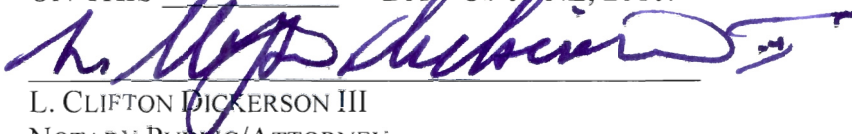
17. Two of the vessels, BUMBLE BEE and QUEEN BEE, owned and operated by Bee Mar – Bumble Bee LLC and Bee Mar – Queen Bee LLC, were recently delivered and, as a result of the Moratorium have only been able to obtain day-to-day contracts, rather than long-term time charter contracts as is typical for these sophisticated, “high-spec” modern DP2 platform supply vessels.
18. Given the contract terminations and suspensions and the lack of prospective long-term contract opportunities for Bee Mar Deepwater Vessel Companies, the Moratorium has harmed and will continue to harm Bee Mar Deepwater Vessel Companies in ways that are irreparable.
19. It is impossible to accurately measure the monetary damages and opportunity costs the Bollinger companies will sustain if the Moratorium remains in place. Once the deepwater rigs depart to drill at other international basins, the Gulf of Mexico’s deepwater industry will be at a standstill and the skilled workforce that supports the drilling effort will be forced to go elsewhere for employment. There is no way to measure the damage that will result from an industry shut-down because each part of it depends on the others. The harm Plaintiffs are sustaining and will continue to sustain without an injunction is irreparable.
20. Family owned and operated since 1946, Bollinger employs 2,500 people, directly or as contract employees.
21. In the 64 years of Bollinger’s existence, Bollinger has never been faced with such an uncertain future. The Moratorium has created an environment leaving Bollinger no choice but to downsize the company thereby eliminating good paying jobs.

Executed on this 15th day of June, 2010.



Andrew St. Germain

SWORN TO AND SUBSCRIBED BEFORE ME
ON THIS 15th DAY OF JUNE, 2010.



L. CLIFTON DICKERSON III
NOTARY PUBLIC/ATTORNEY
LA NOTARY No. 15001