

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

In re:

**CRISTÓBAL M. GALINDO, P.C.
D/B/A GALINDO LAW FIRM,**

Debtor.¹

Chapter 11

Case No. 26-90764

**DECLARATION OF ERIK WHITE IN SUPPORT
OF DEBTOR'S EMERGENCY MOTION FOR ENTRY OF INTERIM AND FINAL
ORDERS AUTHORIZING USE OF CASH COLLATERAL, TO THE EXTENT
APPLICABLE, AND GRANTING RELATED RELIEF**

I, Erik White, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am a Managing Director at HMP Advisory Holdings, LLC d/b/a Harney Partners (“Harney Partners”). Harney Partners is serving as proposed financial advisor to Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm (the “Debtor”), as debtor and debtor in possession in the above-captioned chapter 11 case (the “Case”).

2. I submit this declaration in support of the *Debtor's Emergency Motion for Entry of Interim and Final Orders Authorizing Use of Cash Collateral, to the Extent Applicable, and Granting Related Relief* [ECF No. 13] (the “Cash Collateral Motion”).

3. Except as otherwise stated, the facts set forth in this declaration are based on my personal knowledge, my review of the Debtor's books and records, information provided by the Debtor's management and professionals, and my work with Harney Partners in connection with this Case. If called to testify, I could and would testify competently to the facts set forth below.

¹ The Debtor's address is 18000 Groeschke Road, Suite A-7, Houston, Texas 77084, and the last four digits of the Debtor's federal tax identification number is 5859.

4. Harney Partners has assisted the Debtor and its professionals in analyzing the Debtor's short-term liquidity needs, projected receipts, projected operating disbursements, projected restructuring-related disbursements, and cash-management requirements during the initial weeks of this Case.

5. In connection with that work, Harney Partners reviewed information concerning the Debtor's operating account, projected receipts from legal operations, anticipated operating disbursements, and anticipated bankruptcy-related disbursements.

6. The Debtor is a Texas professional corporation and law firm that represents clients in first-party insurance, personal injury, and mass tort matters. The Debtor's ability to preserve value depends on continued client service, continued operation of its legal practice, maintenance of its cash-management system, and payment of necessary operating expenses.

7. The Debtor's projected cash needs are reflected in the cash forecast attached to the Cash Collateral Motion as Exhibit A (the "Budget").

8. The Budget was prepared using information available to the Debtor and Harney Partners, including projected receipts and disbursements for the period beginning with the week ending August 28, 2026, and continuing through the week ending September 18, 2026.

9. The Budget reflects projected cash receipts from personal-injury, storm, and TPC-related matters, as well as projected operating disbursements for contractor pay, owner pay, rent, utilities, insurance, printing and postage, information technology, office supplies and expenses, advanced case expenses, other general and administrative expenses, and projected bankruptcy-related disbursements.

10. For the initial interim period through the week ending September 18, 2026, the Budget reflects total projected disbursements of \$127,957.

11. Based on my review, the disbursements reflected in the Budget for the interim period are limited to expenses that the Debtor expects to incur to maintain operations, preserve estate value, comply with applicable obligations, and administer this Case.

12. The Budget does not contemplate using client funds held in IOLTA accounts for operating expenses.

13. Based on my review of the Debtor's projected receipts and disbursements, the Debtor requires immediate authority to use Cash Collateral, to the extent applicable, to avoid disruption to its operations and restructuring efforts.

14. Without authority to use available cash in accordance with the Budget, the Debtor may be unable to timely pay necessary operating expenses and case-administration expenses, which could impair the Debtor's ability to continue servicing client matters and preserving value for stakeholders.

15. The Budget is a reasonable and appropriate projection of the Debtor's near-term cash needs based on information available at this time.

16. Harney Partners will continue to assist the Debtor in monitoring actual receipts and disbursements against the Budget and, as needed, preparing budget-to-actual reporting.

17. I believe that the relief requested in the Cash Collateral Motion is necessary to avoid immediate and irreparable harm to the Debtor's estate and is in the best interests of the Debtor, its estate, creditors, clients, and parties in interest.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: August 26, 2026.

Respectfully submitted,

/s/ Erik White

Erik White

Managing Director

HMP Advisory Holdings, LLC d/b/a Harney Partners