

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

In re:

AVAYA INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-90088 (DRJ)
)
) (Jointly Administered)
)

**DECLARATION OF JAMES LEE REGARDING THE
SOLICITATION AND TABULATION OF VOTES ON THE JOINT
PREPACKAGED PLAN OF REORGANIZATION OF AVAYA INC. AND ITS
DEBTOR AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

I, James Lee, depose and declare under the penalty of perjury:

1. I am a Vice President of Public Securities Services, employed by Kurtzman Carson Consultants LLC (“KCC”), located at 222 North Pacific Coast Highway, Suite 300, El Segundo, California 90245. I am over the age of 18 and not a party to this action.

2. P. Joseph Morrow IV, Vice President of Corporate Restructuring Services, employed by KCC, assisted in the service and tabulation described herein.

3. I submit this declaration with respect to the solicitation of votes and the tabulation of ballots cast on the *Joint Prepackaged Plan of Reorganization of Avaya Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 50] (as amended, supplemented, or otherwise modified from time to time, the “Plan”).²

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://www.kccllc.net/avaya>. The location of Debtor Avaya Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 350 Mount Kemble Avenue, Morristown, New Jersey 07960.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan or the Scheduling Motion (as defined herein), as applicable.



4. Prior to the commencement of these Chapter 11 Cases, Avaya Inc. and its affiliated debtors and debtors in possession (collectively, the “Debtors”) engaged KCC as their claims and noticing agent to assist with, among other things, (a) serving solicitation materials to the parties entitled to vote to accept or reject the Plan and (b) tabulating votes cast with respect thereto. KCC and its employees have considerable experience in soliciting and tabulating votes to accept or reject proposed chapter 11 plans.

5. On February 14, 2023, the Debtors filed the *Debtors’ Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent* [Docket No. 5], and the Court entered an order approving the retention on February 14, 2023 [Docket No. 34].

6. Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and/or my review of the relevant documents. I am authorized to submit this declaration (this “Voting Report”) on behalf of KCC. If I were called to testify, I would testify competently as to the facts set forth herein.

A. Service and Transmittal of Solicitation Packages and Related Information.

7. The Solicitation Packages (as defined herein) were distributed in accordance with the solicitation procedures (the “Solicitation Procedures”) described in the *Debtors’ Emergency Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Conditionally Approving the Disclosure Statement, (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures, (IV) Approving the Solicitation Procedures, (V) Approving the Combined Notice, (VI) Extending the Time by Which the U.S. Trustee Convenes a Meeting of Creditors and the Debtors File (A) Schedules and SOFAs*

and (B) Rule 2015.3 Financial Reports, and (VII) Granting Related Relief [Docket No. 52] (the “Scheduling Motion”) and the Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Conditionally Approving the Disclosure Statement, (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures, (IV) Approving the Solicitation Procedures, (V) Approving the Combined Notice, (VI) Extending the Time by Which the U.S. Trustee Convenes a Meeting of Creditors and the Debtors File (A) Schedules and SOFAS and (B) Rule 2015.3 Financial Reports, and (VII) Granting Related Relief [Docket No. 79] (the “Scheduling Order”).

8. The Debtors established February 9, 2023 as the record date (the “Voting Record Date”) for determining which Holders of Class 4 (First Lien Claims) were entitled to vote on the Plan. KCC relied on a register from Goldman Sachs Bank USA, as the Prepetition Term Loan Agent, as of the Voting Record Date to identify the Holders of Legacy Term Loan Claims and B-3 Term Loan Claims entitled to vote to accept or reject the Plan. KCC further relied on security position reports provided by the Depository Trust Company (“DTC”) as of the Voting Record Date to identify the banks and brokerage firms (the “Nominees”) of (i) the Legacy Notes Claims and Secured Exchangeable Notes Claims whose Beneficial Holders were entitled to vote to accept or reject the Plan, and (ii) the Class 7 HoldCo Convertible Notes Claims and Class 12 Existing Avaya Interests, whose Beneficial Holders were entitled to receive opt out of the Releases under the Plan.

I. Prepetition Solicitation

9. On February 14, 2023, prior to the filing of the Debtors’ voluntary petitions, KCC caused to be distributed via electronic mail to Holders of Class 4 Legacy Term Loan Claims and B-3 Term Loan Claims (exclusive of the B-3 Escrow Claims) as of the Voting Record Date: (i) the Plan, (ii) the *Disclosure Statement Relating to the Joint Prepackaged Plan of Reorganization of*

Avaya Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 51] (as amended, supplemented, or otherwise modified from time to time, the “Disclosure Statement”), (iii) the appropriate Class 4 ballot (the “Ballot” and, together with the Plan and Disclosure Statement, the “Solicitation Packages”), and (iv) the Rights Offering Procedures and Subscription Forms³ (collectively, the “RO Materials”).

10. Additionally, on February 14, 2023, KCC caused to be served via electronic mail the Solicitation Packages and RO Materials to the Nominees appearing on the security position reports received from DTC as of the Voting Record Date.

11. A Certificate of Service evidencing the pre-Petition Date service of the Solicitation Packages and RO Materials was filed with the Court on February 15, 2023 [Docket No. 63].

II. Postpetition Solicitation

12. On February 17, 2023, KCC caused to be served (i) the *Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Hearing on the Disclosure Statement, Confirmation of the Joint Prepackaged Chapter 11 Plan, and Related Matters, and (III) Objection Deadlines and Summary of the Debtors' Joint Prepackaged Chapter 11 Plan* (the “Combined Notice”), Solicitation Packages, and RO Materials to the Nominees appearing on the security position reports from the DTC, or the Nominees’ agents, for subsequent forwarding to the underlying beneficial owners of the Class 4 Legacy Notes Claims and Secured Exchangeable Notes Claims, and (ii) the Combined Notice, Notice of Non-Voting Status and appropriate Opt-Out Forms to the Nominees appearing on the security positions reports from the DTC, or the Nominees’ agents, for subsequent forwarding to the underlying beneficial owners of the Class 7 HoldCo Convertible Notes Claims and Class 12 Existing Avaya Interests. KCC also provided the

³ The results of the Rights Offering are beyond the scope of this Voting Report.

Solicitation Packages, RO Materials, Combined Notice, Notice of Non-Voting Status and appropriate Opt-Out Forms, and Master Ballots to each Nominee, or its agent, for their use in reporting the voting and release opt outs of the underlying beneficial owners.

13. On February 17, 2023, KCC caused to be served the Combined Notice, Notice of Non-Voting Status, and appropriate Opt-Out Form to the non-voting classes, including the creditor matrix and registered Holders of Class 12 Existing Avaya Interests, in accordance with the Scheduling Order and Solicitation Procedures. KCC relied on a registered shareholder list provided by the Debtors' stock transfer agent as of the Voting Record Date in connection with the distribution and tabulation of the non-voting Class 12 Existing Avaya Interests Non-Voting Notice and Opt-Out Form.

14. A Certificate of Service evidencing the post-Petition Date service of the foregoing was filed with the Court on February 27, 2023 [Docket No. 235].

15. Additionally, on February 17, 2023, KCC posted links to the electronic versions of the Combined Notice, Notice of Non-Voting Status and Opt-Out Forms, Scheduling Motion and Scheduling Order, Plan, and Disclosure Statement on the face of the public access website at www.kccllc.net/avaya.

16. On March 13, 2023, KCC caused a supplemental mailing of the Combined Notice to be served (a) upon certain existing non-voting parties at new addresses and (b) upon additional non-voting parties. In connection therewith, on March 17, 2023, KCC filed the *Supplemental Certificate of Service* of the Combined Notice [Docket No. 312] (the "Supplemental Combined Notice Certificate").⁴ In light of the foregoing, the Debtors agreed to extend the Opt-Out Deadline

⁴ In sum, the Combined Notice was served on approximately 17,000 creditors on the creditor matrix and over 20,000 equity holders of record.

to April 10, 2023, solely for those parties set forth on Exhibit A to the Supplemental Combined Notice Certificate.

B. The Tabulation Process.

17. In accordance with the Solicitation Procedures, KCC reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to KCC was processed in accordance with KCC's standard tabulation procedures and in compliance with the Solicitation Procedures. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures, (b) executed by the relevant Holder entitled to vote on the Plan (or such Holder's authorized representative), (c) returned to KCC via email or another approved method of delivery set forth in the Solicitation Procedures, and (d) received by KCC by 4:00 p.m. (prevailing Central Time) on March 17, 2023 (the "Voting Deadline"). KCC completed its final tabulation of the Ballots on March 18, 2023, following a complete review and audit of all Ballots received.

18. Set forth below is a summary of the voting results with respect to the Voting Class tabulated on a consolidated basis:

Total Ballots Received			
Accept		Reject	
Number (% of Number)	Amount (% of Amount)	Number (% of Number)	Amount (% of Amount)
Class 4 - First Lien Claims			
99.81%	99.82%	0.19%	0.02%

19. The final tabulation of votes cast by timely (unless the Debtors directed KCC to count a Ballot received after the Voting Deadline) and properly completed Ballots received by KCC is attached hereto as Exhibit A.

20. In addition, in accordance with the Solicitation Procedures, KCC reviewed and tabulated the elections recorded on (i) the Ballots from Holders of Claims in the Voting Class to

opt out of the Plan's third-party release, (ii) the Opt-Out Forms from non-voting Holders of Claims and Holders of Interests, including the creditor matrix, to opt out of the Plan's third-party release, (iii) the Master Opt-Out Form from Class 7 HoldCo Convertible Notes Claims to opt out of the Plan's third party release and Settlement Group Release, and (iv) the Master Interest Opt-Out Form from Class 12 Existing Avaya Interests to opt out of the Plan's third-party release. A report of the foregoing is attached hereto as **Exhibit B**. No Holder of Class 7 HoldCo Convertible Notes Claims elected to opt out of the Settlement Group Release. For the avoidance of doubt, this Declaration does not certify the validity or enforceability of any opt-out release received and reported on **Exhibit B** hereto, but rather is providing such information for reporting and informational purposes only.

C. Ballots That Were Not Counted.

21. KCC did not receive any Ballots that were not included in the tabulation above as not satisfying the requirements for a valid Ballot as set forth in the Scheduling Motion for the reasons described therein.

D. Conclusion.

22. To the best of my knowledge, information, and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true. The Ballots received by KCC are stored at KCC's office and are available for inspection by or submission to this Court.

Dated: March 21, 2023

/s/ James Lee

James Lee
Vice President, Public Securities Services
Kurtzman Carson Consultants LLC

Exhibit A
Class 4 Summary Ballot Report
First Lien Claims

Class	Class Description	Total Members	Unacceptable Votes	Members Voted	Members Accepted	Members Rejected	% Members Accepted	% Members Rejected	Total \$ in Class	Total \$ Voted	\$ Accepted	\$ Rejected	% \$ Accepted	% \$ Rejected
4	First Lien Claims (Lenders)	1025	0	816	816	0	100.00%	0.00%	\$1,893,000,001.24	\$1,731,957,634.31	\$1,731,957,634.31	\$0.00	100.00%	0.00%
4	First Lien Claims (Noteholders)	N/A	0	213	211	2	99.06%	0.94%	\$1,250,000,000.00	\$1,121,695,000.00	\$1,121,097,000.00	\$598,000.00	99.95%	0.05%
Class 4 First Lien Claims TOTAL			0	1029	1027	2	99.81%	0.19%	\$3,143,000,001.24	\$2,853,652,634.31	\$2,853,054,634.31	\$598,000.00	99.98%	0.02%

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
2/27/2023	318 Highspeed, LLC	Yes
3/14/2023	Abbott Laboratories	Yes
3/16/2023	ACM ELF E SUB II LLC	Yes
3/16/2023	ACM ELF ST LLC	Yes
3/15/2023	AFINITI	Yes
3/16/2023	Afiniti AI Limited	Yes
3/15/2023	AFINITI INC	Yes
3/15/2023	AFINITI SATMAP INC	Yes
2/25/2023	Name on File	Yes
3/15/2023	Name on File	Yes
3/7/2023	Name on File	Yes
3/16/2023	Name on File	Yes
2/24/2023	Almond Glass Works Inc	Yes
3/17/2023	Amazon Web Services, Inc.	Yes
3/17/2023	American Fire and Casualty Company	Yes
3/16/2023	AmeriHealth Caritas Health Plan (f/k/a AmeriHealth Mercy Health Plan)	Yes
3/12/2023	Name on File	Yes
3/13/2023	Name on File	Yes
2/25/2023	Name on File	Yes
3/17/2023	Ariba, Inc.	Yes
3/14/2023	Name on File	Yes
3/17/2023	Ascom Sweden AB	Yes
3/16/2023	Atlas Systems, Inc.	Yes
3/15/2023	Name on File	Yes
3/15/2023	B&D Automotive, Inc	Yes
3/1/2023	Name on File	Yes
3/3/2023	BEN CLEMENTS & SONS, INC.	Yes
3/16/2023	Bird & Bird LLP	Yes
3/16/2023	Blue Cross Complete of Michigan	Yes
3/9/2023	Board of Education of Washington County	Yes
3/7/2023	Name on File	Yes
3/16/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/17/2023	BRI 1875 Meridian, LLC	Yes
3/17/2023	California Department of Tax and Fee Administration	Yes
3/9/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/4/2023	Name on File	Yes
3/13/2023	Central Kansas Library System	Yes
3/6/2023	Centric MIT	Yes
2/27/2023	Name on File	Yes
3/15/2023	Charter Communications	Yes
3/17/2023	CIT Group, Inc.	Yes
3/1/2023	City of Bonham	Yes
3/13/2023	CITY OF DELTONA	Yes

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
3/8/2023	City of Flint	Yes
2/27/2023	City of Gordon	Yes
3/14/2023	City of Philadelphia Department of Revenue	Yes
3/2/2023	Clark County Sheriffs Office	Yes
3/12/2023	CLOUD PHONE NATION	Yes
2/27/2023	Communications Solutions, Inc.	Yes
3/17/2023	Concur Technologies, Inc.	Yes
3/3/2023	Name on File	Yes
3/9/2023	Name on File	Yes
3/15/2023	CSX Corporation, DBA CSX Transportation, Inc or CSX Technology, Inc	Yes
2/28/2023	Customized Technologies Inc.	Yes
3/16/2023	Name on File	Yes
3/16/2023	Name on File	Yes
3/4/2023	Name on File	Yes
3/14/2023	Name on File	Yes
3/14/2023	Name on File	Yes
3/3/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/2/2023	Dependable IT Solutions	Yes
3/16/2023	Name on File	Yes
3/14/2023	Name on File	Yes
3/10/2023	Name on File	Yes
3/9/2023	Name on File	Yes
3/8/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/2/2023	DuPont	Yes
3/16/2023	Durand Crosby, Oklahoma Department of Mental and Substance Abuse	Yes
2/28/2023	Durham Boat Company, Inc.	Yes
2/28/2023	EAST VALLEY RV SPECIALISTS INC	Yes
2/27/2023	Name on File	Yes
3/17/2023	Edward D. Jones & Co., L.P.	Yes
3/9/2023	El Paso Independent School District	Yes
2/27/2023	ELECTSYS TECH LLC	Yes
3/16/2023	Element Fleet Corporation	Yes
3/16/2023	Element Fleet Management Inc.	Yes
3/17/2023	Epsilon Data Management, LLC	Yes
3/7/2023	Erlanger Health System Inc.	Yes
3/7/2023	Erlanger Health System Inc.	Yes
3/7/2023	Erlanger Health System Inc.	Yes
3/7/2023	Erlanger Health System Inc.	Yes
3/16/2023	Name on File	Yes
3/16/2023	Fortis Advisors LLC	Yes
3/6/2023	Fountain Foundry	Yes
3/8/2023	Name on File	Yes

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
3/9/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/3/2023	Fresenius Medical Care 100774	Yes
3/8/2023	Fresenius Medical Care 9286	Yes
3/8/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/2/2023	Name on File	Yes
3/6/2023	Name on File	Yes
2/27/2023	Glasscock County Co-op	Yes
3/14/2023	Name on File	Yes
2/27/2023	Golans Moving & Storage	Yes
2/28/2023	Golden City R-III School	Yes
3/13/2023	Name on File	Yes
3/17/2023	Name on File	Yes
3/1/2023	HARLAN COUNTY HEALTH SYSTEM	Yes
3/13/2023	HB White Insurance Agency LLC	Yes
3/13/2023	HB White Insurance Agency LLC	Yes
2/27/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/13/2023	Name on File	Yes
2/28/2023	Illinois Local Government Mt Vernon Twp Genl Asst	Yes
3/2/2023	Imperial County Sheriff	Yes
3/17/2023	INSPYR Solutions, LLC	Yes
3/15/2023	Name on File	Yes
2/25/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/11/2023	Name on File	Yes
3/1/2023	Name on File	Yes
2/24/2023	Jefferson Township - Drummond School	Yes
3/6/2023	Name on File	Yes
3/15/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/16/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/6/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/2/2023	Name on File	Yes
3/12/2023	Name on File	Yes
3/10/2023	Name on File	Yes
3/10/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/15/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/16/2023	Keystone Family Health Plan (f/k/a Keystone Mercy Health Plan)	Yes
3/16/2023	Name on File	Yes

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
3/1/2023	KITTCOM	Yes
2/27/2023	Korean Broadcasting System	Yes
2/24/2023	Lamar County Water Supply District	Yes
3/1/2023	Name on File	Yes
3/15/2023	LAWPLUS LTD.	Yes
3/15/2023	LAWPLUS LTD.	Yes
3/17/2023	Liberty Insurance Underwriters, Inc.	Yes
3/17/2023	Liberty Mutual Insurance Company	Yes
3/15/2023	Name on File	Yes
3/3/2023	Lindenhurst Memorial Library	Yes
3/16/2023	Name on File	Yes
3/16/2023	Name on File	Yes
3/13/2023	Name on File	Yes
2/25/2023	Name on File	Yes
3/14/2023	Louisiana Department of Revenue	Yes
3/1/2023	Lowell Community Charter Public School	Yes
3/13/2023	Luxoft Global Operations GmbH	Yes
3/16/2023	Name on File	Yes
3/14/2023	Name on File	Yes
3/16/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/15/2023	Name on File	Yes
2/27/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/2/2023	Midwest Energy	Yes
3/1/2023	Montgomery County Department of Social Services	Yes
3/3/2023	New England Communications	Yes
2/27/2023	New Mexico Local Government Colfax County Extension Service	Yes
3/13/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/17/2023	One Penn Plaza LLC	Yes
3/16/2023	Oracle America Inc.	Yes
3/16/2023	Oracle America Inc.	Yes
3/16/2023	Oracle America Inc.	Yes
3/5/2023	Name on File	Yes
3/8/2023	Name on File	Yes
2/28/2023	Name on File	Yes
3/6/2023	Name on File	Yes
3/14/2023	Name on File	Yes
2/26/2023	Name on File	Yes
3/3/2023	Name on File	Yes
3/10/2023	Name on File	Yes
3/17/2023	Perkins Coie LLP	Yes
3/5/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/7/2023	Progress Park Veterinary Hospital	Yes

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
3/4/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/11/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/4/2023	Name on File	Yes
3/16/2023	Rimini Street, Inc.	Yes
3/16/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/13/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/10/2023	Roger Mills County	Yes
3/8/2023	Name on File	Yes
2/28/2023	Name on File	Yes
2/27/2023	Roselle park BOE	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
2/27/2023	Ruidoso Municipal School District	Yes
3/10/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/17/2023	SAP America, Inc.	Yes
3/1/2023	Schuyler City DBA Department of Utilities	Yes
3/7/2023	Name on File	Yes
2/27/2023	Name on File	Yes
2/28/2023	South East Area Transit	Yes
3/6/2023	Name on File	Yes
3/6/2023	Name on File	Yes
3/15/2023	Name on File	Yes
3/13/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/2/2023	Stewart Glapat Corporation	Yes
3/17/2023	SuccessFactors, Inc.	Yes
3/3/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/11/2023	Switch Global	Yes
3/17/2023	Sybase, Inc.	Yes
3/13/2023	Syncreon Technology (USA) LLC	Yes
2/27/2023	Tangipahoa Parish Fire District # 1	Yes
3/8/2023	TD Staff LLC dba TrainingPros	Yes
3/1/2023	Tekton Fields LLC	Yes
2/27/2023	Telecom Technologies, Inc.	Yes
3/15/2023	Tennessee Department of Revenue and State of Tennessee	Yes
2/28/2023	Name on File	Yes

Exhibit B
Opt-Out Parties

Date Received	Name of Holder	Opt Out of Third Party Release
3/6/2023	Texas Comptroller of Public Accounts	Yes
3/13/2023	The Gamma Technologies Inc	Yes
3/10/2023	The Neiman Marcus Group, LLC	Yes
3/15/2023	Name on File	Yes
3/8/2023	Thomas Frankel (Admirals Core Realty)	Yes
3/17/2023	Name on File	Yes
3/12/2023	Name on File	Yes
3/8/2023	Name on File	Yes
2/27/2023	Name on File	Yes
3/10/2023	Total Quality Logistics, LLC	Yes
2/28/2023	Town of Colmar Manor	Yes
3/17/2023	Travelers Indemnity Co. and any entity that directly or indirectly controls, is controlled by, or is under common control with it or Travelers Indem. Cos., Inc. or its or their successor in interest	Yes
3/15/2023	T-Systems Hungary Ltd. Telekom System Integration Ltd.	Yes
3/15/2023	TTEC a/k/a TTEC Holdings, Inc.	Yes
3/16/2023	U.S. Department of Justice - US Trustee Program	Yes
3/3/2023	Valley Allergy Clinic, PC	Yes
3/16/2023	Vanguard Fiduciary Trust Company Russell 2000 Value Index Trust	Yes
3/16/2023	Vanguard Total Stock Market Index Fund, Vanguard Balanced Index Fund Equity, Vanguard Extended Market Index Fund	Yes
3/2/2023	Name on File	Yes
3/14/2023	Name on File	Yes
3/8/2023	Name on File	Yes
3/6/2023	Name on File	Yes
3/17/2023	Wayne County Airport Authority	Yes
3/8/2023	Wellsville Carnegie Public Library	Yes
3/2/2023	Wheeling Park District - CRC	Yes
3/2/2023	Wheeling Park District - PFS	Yes
3/17/2023	Name on File	Yes
3/4/2023	Name on File	Yes
2/25/2023	Name on File	Yes
3/1/2023	Name on File	Yes
3/16/2023	Name on File	Yes
3/15/2023	Name on File	Yes
3/9/2023	WISCONSIN PUBLIC K-12 VIROQUA AREA SD - 2018	Yes

Exhibit B
Class 4 Opt-Out Detail
First Lien Claims (Noteholders)

DTC Part No.	Nominee	Total Number of Accounts Electing Third Party Release Opt Out	Total Principal Amount of Third Party Release Opt Out
5	GOLDMAN	1	\$808,000
10	BROWN BROS	1	\$400,000
352	JPMS/JPMC	2	\$1,294,000
901	BANK OF NY	2	\$6,555,000
902	JPMCBNA	5	\$441,560,000
908	CITIBANK	2	\$2,679,000
2147	BNP/PPBC	4	\$7,996,000
2154	BNP/PRIME	1	\$562,000
2803	US BANK NA	2	\$1,000,000
	TOTALS:	20	462,854,000

Exhibit B
Class 7 Opt-Out Detail
Holdco Convertible Note Claims

DTC Part No.	Nominee	Total Number of Accounts Electing Third Party Release Opt Out	Total Principal Amount of Third Party Release Opt Outs	Total Number of Accounts Electing Settlement Group Release Opt Out	Total Principal Amount of Settlement Group Release Opt Outs
901	BANK OF NY*	1	\$ 30,000	-	\$ -
229	BARCLAY/LE	1	\$ 527,000	-	\$ -
	TOTALS:	2	557,000	-	\$ -

* Not a holder as of February 9, 2023 record date

Exhibit B
Class 12 Opt-Out Detail
Existing Avaya Interest Holders

DTC Part No.	Nominee	Total Numbers of Accounts Opt-Outs	Total Number of Shares Opting Out
10	BROWN BROS	2	24,789.0000
57	JONES E D	1	1,250.0000
62	VANGUARD	7	9,620.0000
141	WELLS CLRG	2	17,500.0000
158	APEX CLEAR	128	389,147.5451
161	BOFA	1	634.0000
164	CHS SCHWAB	50	232,296.0000
188	TD AMERITR	55	1,541,219.0000
221	UBS FINAN	1	100.0000
226	NFS LLC	93	234,220.0000
279	HILLTOPSEC	1	2,200.0000
352	JPMS/JPMC	4	20,349.0000
385	E*TRADE	1	1.0000
443	PERSHING	4	218,533.0000
534	INT BROKER	17	319,473.0000
901	BANK OF NY	5	156,346.0000
902	JPMCBNA	16	209,743.0000
2402	DRIVEW LLC	59	99,764.2845
2803	US BANK NA	1	1.0000
5002	RBC/DOMN	4	5,265.0000
5008	NBFI INC	1	200.0000
5028	DESJRDIN	1	191.0000
5030	CIBCWRDL	1	55.0000
5036	TD WATER	4	395,620.0000
5084	QUES/CDS	2	1,500.0000
8862	MLPFS	4	49,297.0000
	TOTALS:	465	3,929,313.8296