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Counsel to Honeywell International Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GARRETT MOTION INC., *et al.*,¹

Debtors.

GARRETT MOTION INC. and GARRETT ASASCO INC.,

Plaintiffs,

v.

HONEYWELL INTERNATIONAL INC., HONEYWELL
ASASCO LLC, HONEYWELL ASASCO 2 LLC,
HONEYWELL HOLDINGS INTERNATIONAL INC., SU
PING LU, AND DARIUS ADAMCZYK

Defendants.

) Chapter 11

) Case No. 20-12212 (MEW)

) (Jointly Administered)

) Adv. Proc. No. 20-01223 (MEW)

MOTION TO DISMISS ADVERSARY PROCEEDING

¹ The last four digits of Garrett Motion Inc.'s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors' corporate headquarters is located at La Pièce 16, Rolle, Switzerland.



Honeywell International Inc., Honeywell ASASCO LLC, Honeywell ASASCO 2 LLC, Honeywell Holdings International Inc., Su Ping Lu, and Darius Adamczyk (collectively, “Defendants”) will hereby move this Court, on November 18, 2020, at 11:00 a.m., before the Honorable Michael E. Wiles, Courtroom 617, One Bowling Green, New York, New York 10004 for an Order dismissing the above-captioned adversary proceeding for the reasons described in the accompanying Memorandum of Law. In summary, the Complaint fails to state a claim under the law governing spin-off transactions and so should be dismissed.

WHEREFORE, for the reasons set forth in the Memorandum of Law, Defendants respectfully request that the Court dismiss the Complaint with prejudice and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: New York, New York
October 13, 2020

/s/ Craig S. Primis
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- and -

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Counsel to Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:)	Chapter 11
)	
GARRETT MOTION INC., <i>et al.</i> , ¹)	Case No. 20-12212 (MEW)
)	
Debtors.)	(Jointly Administered)
)	
)	
GARRETT MOTION INC. and GARRETT ASASCO INC.,)	Adv. Proc. No. 20-01223 (MEW)
)	
Plaintiffs,)	
)	
v.)	
)	
HONEYWELL INTERNATIONAL INC., HONEYWELL)	
ASASCO LLC, HONEYWELL ASASCO 2 LLC,)	
HONEYWELL HOLDINGS INTERNATIONAL INC., SU)	
PING LU, AND DARIUS ADAMCZYK)	
)	
Defendants.)	
)	

[PROPOSED] ORDER GRANTING MOTION TO DISMISS

This matter comes before the Court on Defendants’ Motion to Dismiss the above-captioned adversary proceeding. Having considered Defendants’ Motion and any opposition thereto, the Court has determined that the Motion shall be granted.

It is, therefore:

ORDERED that Defendants’ Motion is **GRANTED**; and it is further,

ORDERED that all Counts contained in the Complaint are hereby **DISMISSED WITH PREJUDICE**.

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

SO ORDERED.

HON. MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE