

Presentment Date and Time: November 2, 2020 at 10:00a.m. ET
Objection Deadline: October 30, 2020 at 4:00 p.m. ET

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Proposed Counsel to the Debtors

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

_____	X	
In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , ¹	:	Case No. 20-12212 (MEW)
	:	
Debtors.	:	Jointly Administered
	:	
_____	X	

**NOTICE OF PRESENTMENT OF AN ORDER FURTHER EXTENDING
THE DEBTORS' TIME TO FILE SCHEDULES AND STATEMENTS
OF FINANCIAL AFFAIRS OF CERTAIN DEBTORS**

PLEASE TAKE NOTICE that on September 20, 2020, Garrett Motion Inc., on behalf of itself and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), filed the *Debtors’ Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenses, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs, (II) Extending Time to File Rule 2015.3 Financial Reports, (III) Waiving Requirements to File the List of Equity Holders*

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, which are being jointly administered, 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’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.



and Serve Notice of Commencement on All Equity Holders and (IV) Granting Related Relief
[Docket No. 5] (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that on September 24, 2020, the Court entered the *Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenses, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs, (II) Extending Time to File Rule 2015.3 Financial Reports, (III) Waiving Requirements to File the List of Equity Holders and (IV) Granting Related Relief* [Docket No. 77] (the “Extension Order”). The Extension Order, among other things, extended the time by which the Debtors must file the Schedules and Statements to the date that is forty-four days after the Petition Date, without prejudice to the Debtors’ rights to seek additional extensions. The Extension Order also provided that the Debtors are permitted to seek any further extension by notice of presentment on five business days’ notice to the U.S. Trustee, counsel to KPS Capital Partners, LP, as stalking horse bidder, Davis Polk & Wardwell LLP, and the advisors to any official committee appointed in these Chapter 11 Cases (collectively, the “Extension Notice Parties”).

PLEASE TAKE FURTHER NOTICE that the Debtors are seeking an additional forty-five day extension, to December 18, 2020, of the deadline to file the Schedules and Statements with respect to all Debtors other than Garrett Motion Inc., Garrett Motion Holdings Inc., Garrett ASASCO Inc. and Garrett Motion Holdings II Inc., without prejudice to seek further extensions. In accordance with the Extension Order, the Debtors have conferred with the Extension Notice Parties, and each of the Extension Notice Parties has consented to such extension. Accordingly, in accordance with the Extension Order, the Debtors will present the *Order Further Extending Time to File Schedules of Assets and Liabilities, Schedules of*

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

Current Income and Expenses, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs of Certain Debtors (the “Proposed Order”) attached hereto as Exhibit A to the Honorable Michael E. Wiles, United States Bankruptcy Judge, for approval and signature on **November 2, 2020 at 10:00 a.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, unless a written objection to the Proposed Order is filed with the Court in accordance with the customary practices of the Court and General Order M-399 and is delivered to the undersigned and the chambers of the Honorable Michael E. Wiles, so as to be received by **October 30, 2020 at 4:00 p.m. (prevailing Eastern Time)**, there will not be a hearing to consider the Proposed Order, and such Proposed Order may be signed and entered by the Court.

PLEASE TAKE FURTHER NOTICE that, if a written objection is timely filed and served, a hearing (the “Hearing”) will be scheduled to consider the Proposed Order before the Court at a date and time to be announced. Objecting parties are required to telephonically attend any Hearing and a failure to appear may result in relief being granted without further action of the Court.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and the Extension Order may be inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Court’s website at www.nysb.uscourts.gov. Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents. Parties-in-interest may sign up for a PACER account by visiting the PACER website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856. Additionally, copies of the Motion, the Extension Order and all other papers filed in the Chapter 11 Cases are available free of charge from the website of the Debtors’ claims and noticing agent, Kurtzman Carson Consultants LLC, at <http://www.kccllc.net/garrettmotion> or by calling (866)

812-2297 (U.S./Canada), (781) 575-4050 (International) or +800 3742 6170 (International Toll Free).

Dated: October 25, 2020
New York, New York

/s/ Andrew G. Dietderich

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Proposed Counsel to the Debtors

Exhibit A

Proposed Order

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

	X	
In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , ¹	:	Case No. 20-12212 (MEW)
	:	
Debtors.	:	Jointly Administered
	:	
	X	

**ORDER FURTHER EXTENDING TIME TO FILE SCHEDULES OF ASSETS
AND LIABILITIES, SCHEDULES OF CURRENT INCOME AND EXPENSES,
SCHEDULES OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES
AND STATEMENTS OF FINANCIAL AFFAIRS OF CERTAIN DEBTORS**

Upon the notice of presentment, dated October 25, 2020 (the “Notice of Presentment”),² of Garrett Motion Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) further extending the Debtors’ time to file Schedules and Statements of certain Debtors, and pursuant to the *Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenses, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs, (II) Extending Time to File Rule 2015.3 Financial Reports, (III) Waiving Requirements to File the List of Equity Holders and (IV) Granting Related Relief* [Docket No. 77] (the “Extension Order”); and this Court having jurisdiction to consider the Notice of Presentment pursuant to 28 U.S.C. §§ 157 and 1334; and venue of these Chapter 11 Cases and the Notice of Presentment in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter

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² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Notice of Presentment.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Notice of Presentment and the relief requested therein has been provided in accordance with the Extension Order, the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and there being no objections to the relief requested; and this Court having found and determined that the relief sought in the Notice of Presentment is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Notice of Presentment establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The relief requested in the Notice of Presentment is hereby granted.
2. The deadline for the Debtors to file the Schedules and Statements for all Debtors other than Debtors Garrett Motion Inc., Garrett Motion Holdings Inc., Garrett ASASCO Inc. and Garrett Motion Holdings II Inc. is extended to December 18, 2020, without prejudice to the Debtors' rights to seek additional extensions.
3. The Debtors are hereby permitted to seek further extensions by notice of presentment on five business days' notice to the U.S. Trustee, counsel to KPS Capital Partners, LP, as stalking horse bidder, Davis Polk & Wardwell LLP, and the advisors to any official committee appointed in these Chapter 11 Cases, including the Official Committee of Unsecured Creditors, and that in such event (i) the deadline for the Debtors to file their Schedules and Statements for all Debtors other than Debtors Garrett Motion Inc., Garrett Motion Holdings Inc., Garrett ASASCO Inc. and Garrett Motion Holdings II Inc. shall be automatically extended through and including the later of the date upon which the Court enters an order denying such extension and any further date determined by the Court and (ii) the Debtors shall be permitted to

submit a bridge order to the Court reflecting such automatic extension, which bridge order may be entered with no further notice or opportunity to be heard afforded to any party.

4. The requirements set forth in Local Rule 9013-1(b) are satisfied.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Notice of Presentment or the implementation of this Order.

Dated: _____
New York, New York

The Honorable Michael E. Wiles
United States Bankruptcy Judge