

Brian D. Pfeiffer
Philip Abelson
Harrison Denman
Colin T. West
John J. Ramirez
Samuel P. Hershey
Ashley Rona Chase
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200

Jason N. Zakia (admitted *pro hac vice*)
WHITE & CASE LLP
111 S. Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400

*Proposed Attorneys to the Official Committee of
Unsecured Creditors of Garrett Motion Inc., et al.*

**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. Pro. No. 20-01223 (MEW)
)

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' proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors' corporate headquarters is located at La Pièce 16, Rolle, Switzerland.



**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO INTERVENE IN ADVERSARY
PROCEEDING PURSUANT TO STIPULATION**

1. On November 9, 2020 the Official Committee of Unsecured Creditors of Garrett Motion Inc., *et al.*, filed the *Motion of the Official Committee of Unsecured Creditors to Intervene in Adversary Proceeding Pursuant to Stipulation* [Adv. Pro. Dkt. No. 15] (the “Motion”). Objections to the Motion were to be filed and served no later than November 16, 2020 at 4:00 p.m. (ET) (the “Objection Deadline”).

2. The undersigned certifies that to the best of his knowledge, and after reviewing the Court’s docket in this case, no answer, objection, or otherwise responsive pleading to the Motion appears thereon. In accordance with rule 9075-2 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, this Certificate of No Objection is being filed at least forty-eight hours after expiration of the Objection Deadline.

3. It is hereby respectfully requested that the order attached to the Motion and attached for convenience again hereto as Exhibit A be entered at the Court’s earliest convenience.

[Remainder of page intentionally left blank]

Dated: November 18, 2020
New York, New York

Respectfully submitted,

WHITE & CASE LLP

By: */s/ Colin T. West*

Brian D. Pfeiffer
Philip Abelson
Harrison Denman
Colin T. West
John J. Ramirez
Samuel P. Hershey
Ashley Rona Chase
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Email: brian.pfeiffer@whitecase.com
philip.abelson@whitecase.com
harrison.denman@whitecase.com
cwest@whitecase.com
john.ramirez@whitecase.com
sam.hershey@whitecase.com
ashley.chase@whitecase.com

- and -

Jason N. Zakia (admitted *pro hac vice*)
WHITE & CASE LLP
111 S. Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
Facsimile: (312) 881-5450
Email: jzakia@whitecase.com

*Proposed Attorneys to the Official Committee
of Unsecured Creditors of Garrett Motion Inc., et
al.*

Exhibit A

Proposed Order

**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. Pro. No. 20-01223 (MEW)

**ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS TO INTERVENE IN THE
ADVERSARY PROCEEDING**

Upon consideration of the *Motion of the Official Committee of Unsecured Creditors to Intervene in the Adversary Proceeding Pursuant to Stipulation by the Adversary Parties* (the “Motion to Intervene”)², it is **ORDERED** that:

1. The relief requested in the Motion to Intervene is granted.

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' proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors' corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

² Capitalized terms used and not otherwise defined herein shall have the meaning(s) ascribed to them in the Motion to Intervene.

2. The Committee is authorized to intervene in the Adversary Proceeding as a party in interest.

3. Subject to the Committee's entry into a satisfactory protective order, (i) all sealed pleadings and discovery taken to date shall be made available to the Committee within seven business days of entry of this order, and (ii) further discovery propounded, received, or produced must be promptly made available to the Committee.

4. Counsel to the Committee shall be entitled to attend any deposition(s) subsequently taken in connection with the Adversary Proceeding.

5. The Committee shall have the right to file briefs stating its position on issues raised in the Adversary Proceeding.

6. The Committee may be heard at arguments concerning issues raised in this Adversary Proceeding.

7. All pleadings and other papers required to be served on every party in the Adversary Proceeding shall be served on the Committee.

8. The Committee, the Plaintiffs and the Defendants reserve all rights with respect to additional participation by the Committee in the Adversary Proceeding, including the Committee's right to take affirmative discovery.

Dated: _____, 2020
New York, New York

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE