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Proposed Counsel to the Official Committee of Equity Security Holders

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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

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



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CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS TO INTERVENE IN ADVERSARY PROCEEDING PURSUANT TO STIPULATION

1. On December 2, 2020, the Official Committee of Equity Security Holders of Garrett Motion Inc. filed the *Motion of the Official Committee of Equity Security Holders to Intervene in Adversary Proceeding Pursuant to Stipulation* [Adv. Pro. Dkt. No. 26] (the "Motion").

Objections to the Motion were to be filed and served no later than December 9,
2020 at 4:00 p.m. (ET) (the "<u>Objection Deadline</u>").

3. The undersigned certifies that to the best of his knowledge, and after reviewing the Court's docket in this case, no answer, objection, or other 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 the expiration of the Objection Deadline.

4. 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*]

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Dated: December 11, 2020 New York, New York

Respectfully submitted,

KASOWITZ BENSON TORRES LLP

/s/ Andrew R. Kurland

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Proposed Counsel for the Official Committee of Equity Security Holders

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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

ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS TO INTERVENE IN THE ADVERSARY PROCEEDING

Upon consideration of the Motion of the Official Committee of Equity Security

Holders to Intervene in the Adversary Proceeding Pursuant to Stipulation by the Adversary

Parties (the "<u>Motion to Intervene</u>")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 <u>http://www.kccllc.net/garrettmotion</u>. 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.

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

3. Subject to the Equity Committee's entry into a satisfactory protective order,

(i) all sealed pleadings and discovery taken through and including the date of the Order shall be made available to the Equity Committee within three business days of entry of this order, and (ii) further discovery propounded, received, or produced must be promptly made available to the Equity Committee.

Dated: _____, 2020 New York, New York

> HONORABLE MICHAEL E. WILES UNITED STATES BANKRUPTCY JUDGE