

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 20-12212 (MEW)
	:	
Debtors.	:	Jointly Administered
_____	:	
GARRETT LX I S.À R.L., GARRETT BORROWING LLC and GARRETT MOTION INC.,	:	
	:	Adv. Proc. No. 20-01319 (MEW)
Plaintiffs,	:	
-against-	:	
DEUTSCHE TRUSTEE COMPANY LIMITED, as Trustee of the 5.125% Senior Notes Due 2026,	:	
	:	
Defendant.	:	
	:	
	X	
_____		

**STIPULATION AND [PROPOSED] ORDER WITH BRIEFING SCHEDULE**

Plaintiffs Garrett LX I S.à r.l., Garrett Borrowing LLC, and Garrett Motion Inc. (collectively, “Plaintiffs”) and Defendant Deutsche Trustee Company Limited (“Defendant” and, together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel, subject to this Court’s approval, agree and stipulate as follows:

WHEREAS, Plaintiffs commenced the above-captioned adversary proceeding (the “Action”) by the filing of a complaint (the “Complaint”) on November 13, 2020;

<sup>1</sup> 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.



WHEREAS, to facilitate complete resolution of the Action, the Parties have agreed that the Plaintiffs shall file an amended complaint in the Action for the sole purpose of adding as additional Plaintiffs those Debtors that are guarantors under that certain Indenture entered into on September 27, 2018 that is attached as Exhibit A to the Complaint (the “Amended Complaint”);

WHEREAS, Defendant has agreed to accept service of the summons and Amended Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. The Plaintiffs shall file the Amended Complaint on or before December 11, 2020.
2. Defendant shall, upon delivery by email of the Amended Complaint to undersigned counsel for the Defendant, accept service of the summons and the Amended Complaint.
3. Defendant shall file its answer to the Amended Complaint and counterclaims, if any, on or before January 8, 2021.
4. Plaintiffs shall file their answer to any counterclaims on or before January 15, 2021.
5. Plaintiffs and Defendant may file cross-motions for summary judgment (the “Motions”) in accordance with the schedule below.
  - a. The Parties shall file their respective Motions and opening briefs on or before January 22, 2021.

b. The Parties shall file their respective opposition briefs on or before February 12, 2021.

c. The Parties shall file their replies in support of their respective Motions on or before February 26, 2021.

6. A hearing to consider the Motions shall be held jointly, and shall be scheduled for a date as soon as the Court's calendar permits following completion of briefing.

7. The Parties reserve all rights with respect to the claims and defenses in connection with the Action.

Dated: December 10, 2020  
New York, New York

/s/ Eric Daucher

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*Counsel to Defendant*

Respectfully submitted,

/s/ Thomas C. White

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*Counsel to the Plaintiffs/Debtors*

**SO ORDERED.**

DATED: December \_\_, 2020  
New York, New York

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HON. MICHAEL E. WILES  
United States Bankruptcy Judge