

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

In re

GARRETT MOTION INC., *et al.*,<sup>1</sup>

Debtors.

GARRETT LX I S.À R.L., GARRETT  
BORROWING LLC, GARRETT MOTION INC.,  
BRH LLC, CALVARI LIMITED, FRICTION  
MATERIALS LLC, GARRETT ASASCO INC.,  
GARRETT HOLDING COMPANY SÀRL,  
GARRETT LX II S.À R.L., GARRETT LX III  
S.À R.L., GARRETT MOTION AUSTRALIA PTY  
LIMITED, GARRETT MOTION AUTOMOTIVE  
RESEARCH MEXICO S. DE R.L. DE C.V.,  
GARRETT MOTION HOLDINGS INC., GARRETT  
MOTION INTERNATIONAL SERVICES S.R.L.,  
GARRETT MOTION IRELAND A LIMITED,  
GARRETT MOTION IRELAND B LIMITED,  
GARRETT MOTION IRELAND C LIMITED,  
GARRETT MOTION IRELAND LIMITED,  
GARRETT MOTION ITALIA S.R.L., GARRETT  
MOTION JAPAN INC., GARRETT MOTION LLC,  
GARRETT MOTION MÉXICO, SOCIEDAD  
ANÓNIMA DE CAPITAL VARIABLE, GARRETT  
MOTION ROMANIA S.R.L., GARRETT MOTION  
SÀRL, GARRETT MOTION SLOVAKIA S.R.O.,  
GARRETT MOTION SWITZERLAND HOLDINGS  
SÀRL, GARRETT MOTION UK A LIMITED,  
GARRETT MOTION UK B LIMITED, GARRETT  
MOTION UK C LIMITED, GARRETT MOTION  
UK D LIMITED, GARRETT MOTION UK  
LIMITED, GARRETT TRANSPORTATION I INC.,

Chapter 11

Case No. 20-12212 (MEW)

Jointly Administered

Adv. Proc. No. 20-01319 (MEW)

<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.



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GARRETT TRANSPORTATION SYSTEM LTD, :  
GARRETT TRANSPORTATION SYSTEMS UK II :  
LTD, GARRETT TS LTD, and GARRETT TURBO :  
LTD, :

Plaintiffs, :

-against- :

DEUTSCHE TRUSTEE COMPANY LIMITED, as :  
Trustee of the 5.125% Senior Notes Due 2026, :

Defendant. :

x

**STIPULATION AND [PROPOSED] ORDER TO STAY PROCEEDINGS**

The above-captioned Plaintiffs and Defendant (collectively, 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;

WHEREAS, on January 4, 2021, the Court entered a stipulation and order (the “Scheduling Order”) requiring, among other things, Plaintiffs to answer Defendant’s counterclaims on or before January 15, 2021, and for the Parties to file their cross-motions for summary judgment on or before January 22, 2021;

WHEREAS, on January 11, 2020, Plaintiffs, which are Debtors in the above-captioned Chapter 11 case, entered into a Plan Support Agreement (Case No. 20-12212, ECF No. 717, Ex. 1) (the “Plan Support Agreement”) with Centerbridge Partners, L.P., Oaktree Capital Management, L.P., Honeywell International Inc., and additional parties named therein, including a group of certain unaffiliated holders of at least 67% in principal amount of the €350,000,000 of 5.125% Senior Notes due October 15, 2026;

WHEREAS, pursuant to section 5.03(xxiv) of the Plan Support Agreement, Plaintiffs/Debtors agreed to suspend all litigation activities and move for a stay of the Action through the effective date of a chapter 11 plan of reorganization (the “Approved Plan”) consistent with the terms and conditions set forth in Exhibit A to the Plan Support Agreement, and to seek dismissal of the Action upon the effective date of the Approved Plan;

WHEREAS, the Parties agree that a stay of all proceedings in this matter is appropriate pending the effective date of the Approved Plan and that no party will suffer prejudice, damage, hardship, or inequity from a stay of this matter at this time;

WHEREAS, a stay will also conserve Parties’ and the Court’s resources and avoid potentially unnecessary litigation;

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

1. The Parties hereby stipulate to, and respectfully request, a stay of all proceedings, including but not limited to (i) all deadlines in the Scheduling Order, and (ii) the pre-trial conference set for January 26, 2021.
2. The Parties further stipulate and agree that nothing herein shall be deemed a waiver of any rights, defenses or arguments by the Parties.

Dated: January 13, 2021  
New York, New York

Respectfully submitted,

/s/ Eric Daucher

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*Counsel to the Plaintiffs/Debtors*

**SO ORDERED.**

DATED: January \_\_, 2021  
New York, New York

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HON. MICHAEL E. WILES  
United States Bankruptcy Judge