

Hearing Date: May 18, 2021 at 11:00 a.m.
Objection Deadline: May 11, 2021 at 4:00 p.m.

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

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

**NOTICE OF SECOND INTERIM APPLICATION OF ANDERSON KILL PC AS A
CONSULTANT AND EXPERT WITNESS TO THE DEBTORS AND DEBTORS-IN-
POSSESSION FOR INTERIM APPROVAL AND ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JANUARY 1, 2021 THROUGH AND INCLUDING MARCH
31, 2021**

PLEASE TAKE NOTICE that on the date hereof, Anderson Kill PC (“Applicant”) filed the *Second Interim Application of Anderson Kill PC as a Consultant and Expert Witness to the Debtors and Debtors-in-Possession for Interim Approval and Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from January 1, 2021 Through and Including March 31, 2021* (the “Interim Fee Application”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) on the Interim Fee Application is scheduled to held telephonically before the Honorable Michael E. Wiles, United States Bankruptcy Judge, on May 18, 2021 at 11:00 a.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections (the “Objections”) to the Interim Fee Application shall be in writing, shall conform to the Federal

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. A complete list of Debtors and last four digits of their tax identification numbers may be obtained from Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.



Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York and shall be filed with the Court in accordance with the customary practices of the Court and General Order M-399. Objections must be filed and received no later than May 11, 2021 at 4:00 pm (Prevailing Eastern Time) (the “Objection Deadline”) and must be served on the following parties: (a) counsel to the Debtors, Quinn Emanuel Urquhart & Sullivan, LLP, 865 S. Figueroa St., 10th Floor Los Angeles, CA 90017, Attn: Razmig Izakelian; (b) counsel to the Debtors, Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Noam R. Weiss; (c) the Office of the United States Trustee for the Southern District of New York, Attn: Benjamin Higgins, Esq.; (d) counsel to the Official Committee of Unsecured Creditors, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020, Attn: Brian Pfeiffer and John Ramirez; (e) counsel to Citibank, N.A., as administrative agent under the DIP credit facility, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attn: Ray C. Schrock, P.C. and Candace M. Arthur, Esq.; (f) counsel to Wilmington Savings Fund Society, FSB, as administrative agent under the Debtors’ prepetition credit facility, Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, NY 10038, Attn: Kristopher M. Hansen, Jonathan D. Canfield, Joanne Lau and Alexander A. Fraser; (g) counsel to Deutsche Trustee Company Limited, as indenture trustee under the Debtors’ 5.125% senior notes due 2026, Norton Rose Fulbright, 1301 Avenue of the Americas, New York, NY 10019, Attn: Francisco Vasquez; (h) counsel to the ad hoc group of lenders under the Debtors’ prepetition credit facility, Gibson Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166, Attn: Scott J. Greenberg, Steven A. Domanowski, Robert A. Klyman and Matthew G. Bouslog; (i) counsel to the ad hoc group of bondholders, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Matthew M. Roose and Mark I. Bane; (j)

to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

All objections that are not resolved by the parties or Court order shall be preserved and presented to the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and failure to appear may result in relief being granted upon default; *provided* that objecting parties shall attend the Hearing telephonically so long as General Order M-399 is in effect or unless otherwise ordered by the Court.

PLEASE TAKE FURTHER NOTICE that in accordance with the *Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [D.I. 291], the Court, in its discretion, may approve an uncontested Interim Fee Application without the need for a hearing. If no Objections are timely filed and served, the Applicant may, after the Objection Deadline, submit to the Court a proposed order granting the Interim Fee Application, which may be entered with no further notice or opportunity to be heard. Upon allowance by the Court, the Debtors shall be authorized to promptly pay Applicant all allowed requested fees, including the 20% holdback, and expenses not previously paid.

PLEASE TAKE FURTHER NOTICE that copies of the Interim Fee Application may be obtained from the Court's website, <https://ecf.nysb.uscourts.gov> for a nominal fee or, free of charge, from the website of the Debtors' claims and noticing agent, <http://www.kccllc.net/garrettmotion>.

Dated: Austin, Texas
April 27, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Matthew Scheck

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*Special Counsel to the Debtors and Debtors
in Possession*

**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	

**SUMMARY OF SECOND INTERIM FEE APPLICATION OF ANDERSON KILL PC AS
A CONSULTANT AND EXPERT WITNESS TO THE DEBTORS AND DEBTORS-IN-
POSSESSION**

NAME OF APPLICANT:	Anderson Kill PC (“Applicant”) ²
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	Garrett Motion, Inc. and certain of its affiliates, as debtors and debtors-in-possession in these Chapter 11 Cases
DATE CASE FILED:	September 20, 2020
DATE OF RETENTION:	January 25, 2021, as of December 11, 2020
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	January 1, 2021 through and including March 31, 2021
TOTAL COMPENSATION REQUESTED:	\$49,464
TOTAL EXPENSE REIMBURSEMENT REQUESTED:	\$70

This is a(n): X interim ___ final application.

This is the second interim fee application filed by Applicant.

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. A complete list of Debtors and last four digits of their tax identification numbers may be obtained from Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

² All terms not defined herein have the meaning ascribed to them in the *Application of Debtors and Debtors in Possession for Entry of an Order Authorizing Retention and Employment of Anderson Kill, P.C. as a Consultant and Expert Witness Pursuant to Bankruptcy Code Sections 327, 328(a), and 1107(b), as of December 11, 2020* [ECF 687].

SUMMARY OF FEES AND EXPENSES REQUESTED FOR FEE PERIOD

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees Paid to Date	Expenses Requested	Expenses Paid to Date
2/19/2021 [ECF 940]	January 1, 2021 – January 31, 2021	\$49,464	\$9,892.80	\$39,571.20	\$70	\$70

SUMMARY OF FEES AND EXPENSES PREVIOUSLY REQUESTED

Date and Docket No.	Period Covered	Fees Requested	Approved Fees	Fees Paid to Date	Expenses Requested	Approved Expenses	Expenses Paid to Date
1/29/2021 [ECF 831]	September 21, 2020 – December 31, 2020	\$19,361.20	\$19,361.20	\$19,361.20	\$0	\$0	\$0

PROJECT CODE TOTAL CHART

Project Name	Hours	Fee Amount
Fee/Employment Applications	7.2	\$5,830.90
Honeywell Litigation	47.5	\$43,633.10
Total:	54.7	\$49,464.00

PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Rate	Hours	Amount
Robert M. Horkovich	Managing Shareholder	\$998.00	46.5	\$46,407
Izak Feldgreber	Analyst	\$405	6	\$2,430
Arline Pelton	Analyst	\$285	2.2	\$627
	Total	\$904.28	54.7	\$49,464

SUMMARY OF DISBURSEMENTS

Cost Type	Amount
Conference Fee	\$70.00
<i>Total</i>	\$70.00

**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	

**SECOND INTERIM APPLICATION OF ANDERSON KILL PC AS A CONSULTANT
AND EXPERT WITNESS TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
INTERIM APPROVAL AND ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM JANUARY 1, 2021 THROUGH AND INCLUDING MARCH 31, 2021**

Anderson Kill PC (“Applicant”), a consultant and expert witness for Garrett Motion, Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby submits this second interim application (this “Application”) pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York (as updated June 17, 2016) (the “Local Guidelines”) and the Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals [ECF 291] (the “Interim Compensation Order”) for: (a) interim approval and allowance of compensation for professional services rendered from January 1, 2021 through and including March 31, 2021 (the “Fee Period”)

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. A complete list of Debtors and last four digits of their tax identification numbers may be obtained from Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

and (b) reimbursement of actual and necessary expenses incurred during the Fee Period. In support of this Application, Applicant respectfully states as follows:

Background

1. On September 20, 2020 (the “Petition Date”), each of the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. Each Debtor continues to operate its business and manage its properties as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors’ cases (the “Chapter 11 Cases”) are being jointly administered pursuant to Bankruptcy Rule 1015. On October 5, 2020, the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [ECF 161]. On November 18, 2020, the U.S. Trustee appointed an Official Committee of Equity Securities Holders pursuant to section 1102 of the Bankruptcy Code [ECF 404].

2. On January 5, 2021, the Debtors filed the *Application of Debtors and Debtors in Possession for Entry of an Order Authorizing Retention and Employment of Anderson Kill, P.C. as a Consultant and Expert Witness Pursuant to Bankruptcy Code Sections 327, 328(a), and 1107(b), as of December 11, 2020* [ECF 687] (the “Retention Application”). On January 25, 2021, the Court entered an order approving the Retention Application and authorizing the retention and employment of Applicant as a consultant and expert witness to the Debtors. [ECF 787].

3. On April 23, 2021, the Court confirmed the *Debtors’ Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [ECF 1129].

Summary of Professional Compensation and Reimbursement of Expenses Requested

4. This Application has been prepared in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Interim Compensation Order, rule 2016-1(c) of the Local Rules, the *Bankruptcy Court’s Amended Guidelines for Fees and Disbursements for*

Professionals in the Southern District of New York Bankruptcy Cases (Bankr. S.D.N.Y. Jan. 29, 2013) (the “Amended Guidelines”) and the U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 in (1) larger chapter 11 cases by those seeking compensation who are not attorneys, (2) all chapter 11 cases below the larger case thresholds, and (3) cases under other chapters of the Bankruptcy Code, effective May 17, 1996 (the “UST Guidelines” and, together with the Local Guidelines and the Amended Guidelines, the “Guidelines”).

5. Pursuant to this Application, Applicant seeks approval and allowance of: (a) compensation for professional services rendered by Applicant, as consultant and expert witness to the Debtors during the Fee Period, of \$49,464 and (b) reimbursement of actual and necessary expenses incurred by Applicant during the Fee Period of \$70.

6. Applicant’s fees for this Fee Period are in accordance with the agreed-upon rates for this period as set forth in the Retention Application. Applicant has agreed to a discounted hourly rate in this case, and this Application does not reflect any increase in Applicant’s rates since Applicant’s retention in these Chapter 11 Cases.

7. During the Fee Period, Applicant’s professionals spent an aggregate of 54.7 hours performing services for the Debtors in connection with these Chapter 11 Cases, at a blended hourly rate for professionals of \$904.28.

8. Applicant’s fees for the services rendered in these Chapter 11 Cases during the Fee Period are reasonable and are commensurate with the complexity of the applicable matters and the level of expertise required to best serve the Debtors in connection therewith. Applicant believes that its fees are comparable to the fees charged by other highly skilled practitioners experienced in advising debtors in non-bankruptcy cases.

9. In accordance with the Guidelines, the following Exhibits are annexed to this Application:

Exhibit A: Proposed Order

Exhibit B: Professionals Performing Services During Fee Period – a chart setting forth information on the Applicant’s professionals who performed services during the Fee Period, including the hourly billing rates charged for such services and the aggregate number of hours expended and fees charged.

Exhibit C: Project Code Total Chart – a specification of aggregate amounts and time totals for each project category to which Applicant billed during the Fee Period.

Exhibit D: Summary of Disbursements – a chart detailing the categories of expenses for which compensation is sought.

Exhibit E: Time Entries and Narrative Descriptions – Applicant’s time entry records by Project Code, recorded in six-minute increments.

Exhibit F: Expense Records – Applicant’s disbursement records from the Fee Period.

Summary of Professional Services Rendered

10. In accordance with the recommendations set forth in the Local Guidelines and the UST Guidelines, Applicant has structured its time records using an internal system of Project Codes. The following descriptions provide a summary of the primary services rendered by Applicant during the Fee Period with respect to each Project Code. Given the scope of the work performed, these summaries do not cover all work performed but instead highlight the major areas of work.

A. Fee and Employment Application

Total Fees: \$5,830.90
Total Hours: 7.2

11. During the Fee Period, Applicant’s professionals coordinated with the Debtors’ special counsel, Quinn Emanuel Urquhart & Sullivan, LLP (“Special Counsel”), in preparing and filing its monthly fee statement and this Application.

B. Honeywell Litigation

Total Fees: \$43,633.10
Total Hours: 47.5

12. During the Fee Period, Applicant's professionals prepared for and performed services in connection with the contested matter, which was scheduled for a 10 day trial in February 2020, initiated by the *Debtors' Motion Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code to Establish Procedures for Estimating the Maximum Amount of Honeywell's Claims and Related Relief* [ECF No. 309] (the "Estimation Proceeding"), the adversary proceeding titled *Garrett Motion Inc., et al. v. Honeywell International Inc., et al.*, Adv. Pro. No. 20-1223 (the "Honeywell Action").

The Requested Compensation and Expense Reimbursement Should Be Allowed

13. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of Section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under Section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and . . . reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A), (B).

14. Section 330 of the Bankruptcy Code also sets forth the criteria for determining the amount of reasonable compensation to be awarded to such a professional:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including --

- (A) the time spent on such services;
- (B) the rates charged for such services;

- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

15. Applicant respectfully submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement pursuant to this Application were necessary for and beneficial to the Debtors' administration of their estates and their reorganization efforts. The expenditures for which Applicant seeks reimbursement are consistent with expenses that are customarily charged by Applicant to non-bankruptcy clients. Applicant has worked diligently to anticipate and respond to the Debtors' needs in these Chapter 11 Cases, and respectfully submits that the services and expenditures described in this Application were necessary to, and in the best interests of, the Debtors' estates and creditors. Applicant further submits that the services its professionals provided to the Debtors were performed economically, effectively and efficiently. The services provided by Applicant were consistently performed in a timely manner commensurate with the complexity, importance, novelty and nature of the issues involved. Accordingly, Applicant respectfully submits that the compensation and reimbursement of

expenses requested herein is reasonable and economical in light of the nature, extent and value of such services to the Debtors, their estates and all parties-in-interest.

Notice

16. The Debtors shall provide notice of this Application to: (a) the Office of the United States Trustee for the Southern District of New York (the "U.S. Trustee"); (b) counsel to Citibank, N.A., as administrative agent under the DIP credit facility, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attn: Ray C. Schrock, P.C. (ray.schrock@weil.com) and Candace M. Arthur, Esq. (candace.arthur@weil.com); (c) counsel to JPMorgan Chase Bank, N.A., as administrative agent under the Debtors' prepetition credit facility, Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, NY 10038, Attn: Kristopher M. Hansen (khansen@stroock.com), Jonathan D. Canfield (jcanfield@stroock.com), Joanne Lau (jlau@stroock.com) and Alexander A. Fraser (afraser@stroock.com); (d) counsel to Deutsche Trustee Company Limited, as indenture trustee under the Debtors' 5.125% senior notes due 2026, Norton Rose Fulbright, 1301 Avenue of the Americas, New York, NY 10019, Attn: Francisco Vasquez (francisco.vasquez@nortonrosefulbright.com); (e) counsel to the Ad Hoc Group of Lenders under the Debtors' prepetition credit facility, Gibson Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166, Attn: Scott J. Greenberg (sgreenberg@gibsondunn.com), Steven A. Domanowski (sdomanowski@gibsondunn.com) and Matt Bouslog (mbouslog@gibsondunn.com); (f) counsel to the ad hoc group of bondholders, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Matthew M. Roose (matthew.roose@ropesgray.com) and Mark I. Bane (mark.bane@ropesgray.com); (g) counsel to KPS Capital Partners, LP, as stalking horse bidder, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attn: Brian M. Resnick (brian.resnick@davispolk.com) and Joshua Y. Sturm (joshua.sturm@davispolk.com); (h) counsel to the official committee of

unsecured creditors (the “Creditors’ Committee”), White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020, Attn: Brian Pfeiffer (brian.pfeiffer@whitecase.com) and John Ramirez (john.ramirez@whitecase.com); (i) counsel for Honeywell, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, NY 10022, Attn: Nicole L. Greenblatt, Mark McKane, and Anthony R. Grossi, and Kirkland & Ellis LLP, 1301 Pennsylvania Avenue, NW, Washington, DC 20004, Attn: Craig S. Primis and Ronald K. Anguas, Jr.; (j) any other party in interest who files a Notice of Appearance and a request for service of documents as set forth in paragraph 6 of the Case Management Procedures; and (k) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

Reservation of Rights

17. Although Applicant has made every effort to include in this Application all fees and expenses incurred during the Fee Period in connection with these Chapter 11 Cases, certain fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. Applicant reserves the right to make further application to the Court for the allowance of such fees and expenses not included in this Application.

No Prior Request

18. No prior application for the relief requested herein has been made to this or any other Court.

Conclusion

WHEREFORE, Applicant respectfully requests that the Court enter an order: (a) awarding Applicant the sum of \$49,464 as compensation for services rendered and \$70 for reimbursement for actual and necessary expenses Applicant incurred during the Fee Period and (b) granting such other and further relief as the Court deems appropriate.

Dated: Austin, Texas
April 27, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Matthew Scheck

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*Special Counsel to the Debtors and Debtors
in Possession*

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 GRANTING THE SECOND APPLICATION OF ANDERSON KILL PC AS A
CONSULTANT AND EXPERT WITNESS TO THE DEBTORS AND DEBTORS-IN-
POSSESSION FOR APPROVAL AND ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM JANUARY 1, 2021 THROUGH AND INCLUDING MARCH 31,
2021**

Upon the application (the “Application”)² of Anderson Kill PC (“Applicant”) for entry of an order (i) granting interim approval and allowance of compensation for professional services rendered, as a consultant and expert witness to Garrett Motion, Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), from January 1, 2021 through and including March 31, 2021 (the “Fee Period”), in the amount of \$49,464 and (ii) authorizing reimbursement of actual and necessary expenses incurred during the Fee Period in the amount of \$0; and this Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and venue of these Chapter 11 Cases and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Application and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is

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² All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Application.

necessary; and any objections (if any) to the Application having been withdrawn or overruled on the merits; and a hearing having been held to consider the relief requested in the Application on ____, 2021 and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Application 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 Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is granted with respect to the Fee Period to the extent set forth in the attached schedule.
2. Compensation to Applicant for professional services rendered during the Fee Period is approved and allowed on an interim basis in the amount of \$49,464.
3. Reimbursement to Applicant for expenses incurred during the Fee Period is approved and allowed on an interim basis in the amount of \$70.
4. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.
5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Application or the implementation of this Order.

Dated: _____
New York, New York

The Honorable Michael E. Wiles
United States Bankruptcy Judge

Schedule A

Current Interim Fee Period

January 1, 2021 – March 31, 2021

Case No.: 20-12212

Case Name: In re Garrett Motion, Inc., *et al.*

Date and Document Number of Application	Interim Fees Requested	Interim Fees Allowed	Interim Fees to be Paid	Interim Expenses Requested	Interim Expenses Approved	Interim Expenses to be Paid
April 27, 2021, ECF [__]	\$49,464	\$49,464	\$9,892.80	\$70	\$70	\$0

EXHIBIT B

PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Rate	Hours	Amount
Robert M. Horkovich	Managing Shareholder	\$998.00	46.5	\$46,407
Izak Feldgreber	Analyst	\$405	6	\$2,430
Arline Pelton	Analyst	\$285	2.2	\$627
	Total	\$904.28	54.7	\$49,464

EXHIBIT C

PROJECT CODE TOTAL CHART

Project Name	Hours	Fee Amount
Fee/Employment Applications	7.2	\$5,830.90
Honeywell Litigation	47.5	\$43,633.10
Total:	54.7	\$49,464.00

EXHIBIT D

SUMMARY OF DISBURSEMENTS

Cost Type	Amount
Conference Fee	\$70.00
<i>Total</i>	\$70.00

EXHIBIT E

TIME ENTRIES AND NARRATIVE DESCRIPTION

<u>Fee/Employment Applications</u>			
Date	Timekeeper	Hours	Narrative
1/25/21	Arline Pelton	1.0	Attention to fee application.
1/25/21	Robert M. Horkovich	1.3	Attention to fee application.
1/26/21	Robert M. Horkovich	2.0	Attend hearing.
1/26/21	Robert M. Horkovich	1.0	Attention to fee application.
1/26/21	Arline Pelton	0.7	Finalize and send documents tso counsel.
1/27/21	Robert M. Horkovich	1.0	Attention to fee application.
1/29/21	Arline Pelton	0.2	Attention to fee-related issues.
	TOTAL	7.2	

<u>Honeywell Litigation</u>			
Date	Timekeeper	Hours	Narrative
1/1/21	Robert M. Horkovich	1.4	Confer with Quinn Emanuel team re assignment.
1/1/21	Robert M. Horkovich	4.6	Review and analyze report of the Nathan group for comment.
1/4/21	Robert M. Horkovich	4.0	Review Honeywell proof of claim and Garrett Motion complaint.
1/5/21	Robert M. Horkovich	4.0	Review Honeywell/Bendix insurance receivable information and defense counsel guidelines.
1/5/21	Izak Feldgreber	6.0	Research re: Billing Guidelines and Litigation Management Guidelines for R. Horkovich.
1/6/21	Robert M. Horkovich	7.2	Identify and draft outline of problems with the report of the Nathan group.
1/7/21	Robert M. Horkovich	5.0	Research and assemble material in preparation for expert opinion.
1/8/21	Robert M. Horkovich	2.0	Review HR&A reports for inconsistencies with the Nathan group report.
1/8/21	Robert M. Horkovich	4.0	Review indemnity agreement in preparation of expert opinion.
1/10/21	Robert M. Horkovich	7.0	Research in preparation of expert report.
1/11/21	Robert M. Horkovich	2.0	Review material in preparation for opinion.
1/21/21	Arline Pelton	0.3	Attention to documents and docket.
	TOTAL:	<u>47.5</u>	

EXHIBIT F

EXPENSE RECORDS

Cost Type	Work Date	Quantity	Rate	Amount	Narrative
Conference Fee	1/26/2021			\$70.00	Vendor: DARRYL FRASER; Invoice#: 012621; Date: 1/26/2021 PAYMENT FOR HEARING WITH JUDGE IN GARRETT MOTION CASE