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Proposed Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

GARRETT MOTION INC., et al.,¹

Debtors.

Chapter 11

X

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Case No. 20-12212 (MEW)

Jointly Administered

NOTICE OF AMENDED² AGENDA FOR HEARING <u>ON OCTOBER 6, 2020 AT 10:00 AM (ET)</u>

HEARING

An evidentiary hearing (the "<u>Hearing</u>") will be held <u>on October 6, 2020 at 10:00</u> <u>AM (ET)</u> before the Honorable Judge Michael E. Wiles, United States Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>"). In light of the COVID-19 pandemic and the Court's General Order M-543, dated March 20, 2020, the Hearing will only be conducted remotely using audio and video conferencing solutions. Parties wishing to participate in the Hearing must make arrangements pursuant to the Order Establishing Procedures for Remote Evidentiary Hearing on October 6, 2020 with respect to Interim Relief on the Debtors' DIP Financing Motion [D.I. 141]. A copy of each pleading to be addressed at the

² Amended items appear in **bold**.



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.

20-12212-mew Doc 165 Filed 10/05/20 Entered 10/05/20 22:54:19 Main Document Pg 2 of 4

Hearing can be viewed (a) for a fee on the Court's website at www.ecf.uscourts.gov and (b) free of charge on the website of the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants LLC at http://www.kccllc.net/garrettmotion.

MATTERS GOING FORWARD

 <u>DIP Financing</u>: Debtors Motion for Entry of Interim and Final Orders, pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 363(c)(2), 363(e), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), 364(e), 503, 506(c), 507 and 552 (I) Authorizing the Debtors to (a) Obtain Postpetition Financing and (b) Use Cash Collateral; (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status; (III) Granting Adequate Protection to the Prepetition Secured Parties; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing and (VI) Granting Related Relief [D.I. 17] (the "<u>DIP</u> <u>Motion</u>")

<u>Status</u>: This matter will be going forward with respect to interim relief on a contested basis. The objections filed at D.I. 109 and D.I. 110 have been withdrawn. The Debtors believe that the objection from Honeywell International Inc. has been resolved and the Debtors remain in discussions with respect to the objection from Caterpillar Inc.

Response Deadline: September 29, 2020

Responses Received:

- a) Redacted Limited Objection to the Debtors' DIP Motion [D.I. 103]
- b) Redacted Continued Objection of Certain Shareholders to Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Obtain Postpetition Financing and Related Relief [D.I. 109]
- c) Limited Objection and Reservation of Rights Concerning Debtors' Motion to Obtain Postpetition Financing [D.I. 110]
- d) Limited Objection and Reservation of Rights of Caterpillar Inc. in Connection with Debtors' Financing Motion [D.I. 116]

Related Documents:

- a) Declaration of Sean Deason in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [D.I. 15]
- b) Declaration of Scott M. Tandberg, Director at AlixPartners, LLP, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [D.I. 16]

20-12212-mew Doc 165 Filed 10/05/20 Entered 10/05/20 22:54:19 Main Document Pg 3 of 4

- c) Notice of Filing of Amended Proposed Interim Order to Debtors' DIP Motion [D.I. 36]
- d) Amendment to Declaration of Sean Deason in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [D.I. 46]
- e) Supplemental Declaration of Scott M. Tandberg, Director at AlixPartners, LLP, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [D.I. 51]
- f) Interim Order (I) Authorizing Use of Cash Collateral and Affording Adequate Protection; (II) Modifying the Automatic Stay; (III) Scheduling a Continued Interim Hearing; and (IV) Granting Related Relief [D.I. 56]
- g) Notice of Filing of Revised DIP Credit Agreement [D.I. 92]
- h) Declaration of Scott M. Tandberg in Support of the Debtors' DIP Motion [D.I. 93]
- i) Supplemental Declaration of Bruce Mendelsohn in Support of Debtors' DIP Motion [D.I. 94]
- j) Supplemental Declaration of Sean Deason in Support of the Debtors' DIP Financing [D.I. 95]
- k) Order Authorizing Honeywell to File Objection to Debtors' DIP Motion under Seal and Granting Related Relief [D.I. 106]
- Notice of Filing of Amended Proposed Interim Order to Debtors' DIP Motion [D.I. 113]
- m) Order Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 Authorizing Certain Shareholders to Redact and File Under Seal Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Obtain Postpetition Financing and Related Relief [D.I. 121]
- n) Order Extending the Outside Date under the Interim Cash Collateral Order [D.I. 124]
- o) Debtors' Omnibus Reply in Support of Debtors' DIP Motion [D.I. 142]
- p) Second Supplemental Declaration of Bruce Mendelsohn in Support of Debtors' DIP Motion [D.I. 143]

20-12212-mew Doc 165 Filed 10/05/20 Entered 10/05/20 22:54:19 Main Document Pg 4 of 4

- q) Supplemental Declaration of Scott M. Tandberg in Support of the Debtors' DIP Motion [D.I. 144]
- r) Reply and Joinder of the Ad Hoc Group of First Lien Lenders in Support of the Debtors' DIP Financing Motion [D.I. 145]
- s) Redacted Sur-Reply in Support of Honeywell's Limited Objection to the Debtors' DIP Motion [D.I. 150 EX. B]
- t) Order Authorizing Honeywell to File Sur-Reply to Objection to Debtors' DIP Motion under Seal and Granting Related Relief [D.I. 152]
- u) Order Authorizing Honeywell to File Sur-Reply to Objection to Debtors' DIP Motion [D.I. 155]
- v) Debtors' Statement with Respect to Motion of Honeywell International Inc. to File a Sur-Reply to the Debtors' DIP Motion [D.I. 156]
- w) Notice of Filing of Amended Proposed Interim Order to Debtors' DIP Motion [D.I. 164]
- Hedging Motion: Debtors Motion for Entry of Interim and Final Orders (I) Authorizing, but not Directing, the Debtors to Enter into, Continue Performing and Provide Credit Support Under, Hedging and Derivative Contracts and (II) Granting Related Relief [D.I. 20]

Status: This matter will be going forward on an uncontested basis.

Dated: October 5, 2020 New York, New York /s/ Andrew G. Dietderich Andrew G. Dietderich Brian D. Glueckstein Benjamin S. Beller Noam R. Weiss SULLIVAN & CROMWELL LLP 125 Broad Street New York, New York 10004 Telephone: (212) 558-4000 Facsimile: (212) 558-3588 dietdericha@sullcrom.com E-mail: gluecksteinb@sullcrom.com bellerb@sullcrom.com weissn@sullcrom.com

Proposed Counsel to the Debtors