

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

EASTMAN KODAK COMPANY, *et al.*,
Debtors.

Chapter 11

Case No. 12-10202-ALG

(Jointly Administered)

**JOINDER OF SEKISUI PRODUCTS LLC TO THE OBJECTION OF CREDITOR
BMP AMERICA, INC. TO DEBTORS' MOTION FOR AN ORDER
ESTABLISHING AND IMPLEMENTING EXCLUSIVE PROCEDURES FOR
TREATMENT OF RECLAMATION CLAIMS**

Sekisui Products LLC ("Sekisui") by and through its undersigned counsel, hereby submits this Joinder to the Objection (the "Objection") of Creditor BMP America, Inc. ("BMP") to Debtors' Motion (the "Motion") for an Order Establishing and Implementing Exclusive Procedures for Treatment of Reclamation Claims. Sekisui respectfully represents as follows:¹

1. On January 19, 2012 (the "Petition Date"), Eastman Kodak Company, *et al.* (the "Debtors") filed the Motion. The Motion is scheduled to be heard by this Court at an omnibus hearing on February 15, 2012 (the "Omnibus Hearing").

2. On or about February 7, 2012 Sekisui provided the Debtors and Debtors' counsel with a reclamation demand (the "Reclamation Demand") attached as **Exhibit A** to the Notice of Reclamation Demand of Sekisui Products LLC [Docket No. 221] (the "Notice"). The Reclamation Demand complies with Section 546(c) of the Bankruptcy Code and applicable non-bankruptcy law (the "Applicable Law"), as well as the proposed Reclamation Procedures set forth in the Motion.

¹ All capitalized terms not otherwise defined herein have the meaning ascribed to them in the Motion.



3. Sekisui agrees with the legal arguments and assertions set forth by BMP in the Objection, specifically as set forth in paragraphs 7-10. As noted in the Objection, a party providing a reclamation demand in accordance with Applicable Law should not be prejudiced if, after the entry of an order with respect to the proposed Reclamation Procedures, such demand is not in compliance with reclamation procedures that were not in effect at the time of the original demand.

4. Notwithstanding that in the Notice, Sekisui previously reserved its rights and remedies under applicable law, Sekisui, in an abundance of caution, preserves its right to amend the Notice and hereby joins in the Objection.

5. Sekisui further reserves all rights to be heard before this Court with respect to the Motion, the Objection, and this Joinder.

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WHEREFORE, Sekisui respectfully requests that this Court sustain the Objection, and grant such other and further relief as this Court deems just and proper.

Dated: San Francisco, California
February 8, 2012

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