

Presentment Date and Time: September 3, 2021 at 10:00 a.m. (prevailing Eastern Time)  
Objection Deadline: August 31, 2021 at 4:00 p.m. (prevailing Eastern Time)

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

In re:	)	Chapter 11
MatlinPatterson Global Opportunities Partners II L.P., <i>et al.</i> ,	)	Case No. 21-11255 (DSJ)
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

**NOTICE OF PRESENTMENT OF AN ORDER  
FURTHER EXTENDING THE DEBTORS’ TIME TO FILE  
STATEMENTS OF FINANCIAL AFFAIRS AND THE EQUITY MATRIX**

**PLEASE TAKE NOTICE** that on July 7, 2021, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Debtors’ Motion for Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities, Statements of Financial Affairs, and the Initial Rule 2015.3 Financial Report; and (II) Granting Related Relief* [Docket No. 5] (the “**Schedules Extension Motion**”), and the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors and (B) File a Consolidated List of the Debtors’*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: MatlinPatterson Global Opportunities Partners II L.P. (8284); MatlinPatterson Global Opportunities Partners (Cayman) II L.P. (8246); MatlinPatterson Global Partners II LLC (6962); MatlinPatterson Global Advisers LLC (2931); MatlinPatterson PE Holdings LLC (6900); Volo Logistics LLC (8287); MatlinPatterson Global Opportunities Partners (SUB) II L.P. (9209). The location of the Debtors’ address is: 600 Fifth Avenue, 22<sup>nd</sup> Floor, New York, New York 10022.



*Largest Unsecured Creditors; (II) Waiving the Requirement to File the List of Equity Security Holders; and (III) Approving Form and Manner of Notifying Creditors and Interest Holders of Commencement of these Chapter 11 Cases* [Docket No. 8] (the “**Equity Matrix Motion**” and together with the Schedules Extension Motion, the “**Motions**”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that on July 9, 2021, the Court entered the *Order (I) Extending the Time to File Schedules of Assets and Liabilities, Statements of Financial Affairs, and the Initial Rule 2015.3 Financial Report; and (II) Granting Related Relief* [Docket No. 32] (the “**SOFA Extension Order**”). On July 9, 2021, the Court entered the *Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors and (B) File a Consolidated List of the Debtors’ Largest Unsecured Creditors; (II) Extending the Deadline to File the List of Equity Security Holders; and (III) Approving Form and Manner of Notifying Creditors and Interest Holders of Commencement of these Chapter 11 Cases* [Docket No. 30] (the “**Equity Matrix Extension Order**”, and together with the SOFA Extension Order, the “**Extension Orders**”). Among other relief, the Extension Orders extended the time by which the Debtors must file their Statement of Financial Affairs and list of equity security holders for a total of forty-five (45) days, through and including the fifty-ninth (59<sup>th</sup>) day after the Petition Date, without prejudice to the Debtors’ right to seek additional extensions or a waiver. The current deadline for the Debtors to file their Statement of Financial Affairs and list of equity security holders is September 3, 2021. The Extension Orders also provided that the Debtors are permitted to seek any further extension by notice of presentment on five business days’ notice (email shall suffice) to the Office of the United States Trustee for the Southern District of New York (the “**US Trustee**”), counsel to any official committee appointed in these Chapter 11 Cases, and all other parties who have filed a

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the applicable Motion.

notice of appearance and request for service of documents in these Chapter 11 Cases (collectively, the “*Extension Notice Parties*”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors are seeking an additional thirty (30) day extension of the time by which the Debtors must file their Statements of Financial Affairs and list of equity security holders, from September 3, 2021 to October 4, 2021.<sup>3</sup> In accordance with the Extension Orders, the Debtors have conferred with the US Trustee, and the US Trustee does not object to an extension of the deadline to October 4, 2021, by which the Debtors must make the filings previously extended to September 3, 2021, and the Debtors are sending this Notice of Presentment to the Extension Notice Parties. The Debtors will present the *Order Further Extending the Debtors’ Time to File Statements of Financial Affairs and the Equity Matrix* (the “*Proposed Order*”) attached hereto as **Exhibit A** to the Honorable David S. Jones, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the “*Court*”), One Bowling Green, Courtroom No. 623, New York, New York 10004, on **September 3, 2021, at 10:00 a.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to entry of the Proposed Order shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of In re MatlinPatterson Global Opportunities Partners II L.P., Case 21-11255 (DSJ) by registered users of the Court’s electronic filing system and in accordance with the General Order M-399 (which is available on the Court’s

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<sup>3</sup> Pursuant to Rule 9006(a)(1)(C) of the Federal Rules of Bankruptcy Procedure, a thirty day extension will extend the deadline to October 4, 2021, the next day that is not a Saturday, Sunday, or legal holiday.

website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **August 31, 2021, at 4:00 p.m. (prevailing Eastern Time)**, by (i) the U.S. Trustee for the Southern District of New York, (ii) Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Elisha D. Graff and David R. Zylberberg (emails: [egraff@stblaw.com](mailto:egraff@stblaw.com) and [david.zylberberg@stblaw.com](mailto:david.zylberberg@stblaw.com))); counsel for the Debtors, (iii) counsel to VRG and counsel to VarigLog, and (iv) counsel to any official statutory committees appointed in the Chapter 11 Cases. Unless a written objection to the Proposed Order is filed with the Court in accordance with this Notice of Presentment, there will not be a hearing to consider the Proposed Order, and such Proposed Order may be signed and entered by the Court.

**PLEASE TAKE FURTHER NOTICE** that, if a written objection is timely filed and served, a hearing (the “**Hearing**”) will be scheduled to consider the Proposed Order before the Court at a date and time to be announced. Objecting parties are required to attend any Hearing, and a failure to appear may result in relief being granted without further action of the Court.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion, the Extension Orders, and all pleadings and filings can be viewed and/or obtained by: (i) accessing the Court’s website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), (ii) contacting the Office of the Clerk of the Court at One Bowling Green, New York, New York 10004, or (iii) from the Debtors’ proposed claims and noticing agent, Kurtzman Carson Consultants LLC (“**KCC**”), by e-mail at [MPIInfo@kccllc.com](mailto:MPIInfo@kccllc.com) or by calling : (888) 733-1416 (toll free) for U.S.-based parties and (310) 751-2630 for international parties or via KCC’s website for the Chapter 11 Cases at : <http://www.kccllc.net/MPII>. Note that a PACER password is needed to access documents on the Court’s website.

*[Remainder of page intentionally left blank]*

Dated: August 24, 2021  
New York, NY

**SIMPSON THACHER & BARTLETT LLP**

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*Counsel to the Debtors and Debtors-in-Possession*

**Exhibit A**

**Proposed Order**

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

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In re:	)	Chapter 11
	)	
MatlinPatterson Global Opportunities Partners II L.P., <i>et al.</i> ,	)	Case No. 21-11255 (DSJ)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

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**ORDER FURTHER EXTENDING THE DEBTORS' TIME TO FILE  
STATEMENTS OF FINANCIAL AFFAIRS AND THE EQUITY MATRIX**

Upon the notice of presentment, dated August 24, 2021 (the “*Notice of Presentment*”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “*Debtors*”) for entry of an order (this “*Order*”) further extending the Debtors’ time to file Statements of Financial Affairs and the Equity Matrix, and pursuant to the Extension Orders; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Notice of Presentment in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Notice of Presentment is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Notice of Presentment and opportunity for a hearing on the relief requested in the Order were appropriate and no other notice need be provided;

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: MatlinPatterson Global Opportunities Partners II L.P. (8284); MatlinPatterson Global Opportunities Partners (Cayman) II L.P. (8246); MatlinPatterson Global Partners II LLC (6962); MatlinPatterson Global Advisers LLC (2931); MatlinPatterson PE Holdings LLC (6900); Volo Logistics LLC (8287); MatlinPatterson Global Opportunities Partners (SUB) II L.P. (9209). The location of the Debtors’ address is: 600 Fifth Avenue, 22<sup>nd</sup> Floor, New York, New York 10022.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Notice of Presentment, filed contemporaneously herewith, or the Motion, as applicable.

and this Court having reviewed the Notice of Presentment; and this Court having determined that the legal and factual bases set forth in the Notice of Presentment establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The relief requested in the Notice of Presentment is hereby granted.
2. The deadline for the Debtors to file Statements of Financial Affairs and list of equity security holders for all Debtors is extended to October 4, 2021, without prejudice to the Debtors' right to seek additional extensions or a waiver.
3. The Debtors are authorized to seek any further extension or waiver by notice of presentment and accompanying order on five business days' notice (email shall suffice) to the Office of the United States Trustee for the Southern District of New York, counsel to any official committee appointed in these Chapter 11 Cases, and all other parties who have filed notice of appearance and request for service of documents in these Chapter 11 Cases, and that in such event (i) the deadline for the Debtors to file their Statements of Financial Affairs and list of equity security holders shall be automatically extended through and including the later of the date upon which the Court enters an order denying such extension and any further date determined by the Court and (ii) the Debtors shall be permitted to submit a bridge order to the Court reflecting such automatic extension, which bridge order may be entered with no further notice or opportunity to be heard afforded to any party.
4. The requirements set forth in Local Bankruptcy Rule 9013-1(b) are satisfied.
5. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Notice of Presentment.



6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

New York, New York

Dated: \_\_\_\_\_, 2021

\_\_\_\_\_  
HONORABLE DAVID S. JONES  
UNITED STATES BANKRUPTCY JUDGE