

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

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In re: )  
 ) Chapter 11  
 )  
MatlinPatterson Global Opportunities Partners II L.P., *et al.*, ) Case No. 21-11255 (DSJ)  
 )  
 ) Debtors.<sup>1</sup> ) (Jointly Administered)  
 )  
 ) Re: Docket Nos. 118, 119

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**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' APPLICATIONS TO  
RETAIN AND EMPLOY FTS US, INC. AND ERNST & YOUNG LLP**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules, the undersigned counsel to the above-captioned debtors and debtors-in-possession (the "**Debtors**") states the following:

1. On August 24, 2021, the Debtors filed the *Debtors' Application for Entry of an Order Authorizing the Debtors to Retain and Employ FTS US, Inc. to Provide Tax Consulting Services Effective as of the Petition Date* [Docket No. 118] (the "**FTS Application**") and the *Debtors' Application for Entry of an Order Authorizing the Debtors to Retain and Employ Ernst & Young LLP as their Tax Services Provider Effective as of the Petition Date* [Docket No. 119] (the "**EY Application**", and together with the FTS Application, the "**Applications**").

2. The deadline for parties to file responses to the relief requested in the Applications was September 7, 2021 at 4:00 p.m. (Eastern Time) (the "**Objection Deadline**").

3. As of the date hereof, counsel to the Debtors has received no answer, objection, or other responsive pleading to the Applications. Counsel to the Debtors has reviewed the Court's

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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.



docket in these cases, and no answer, objection, or other responsive pleading to the Applications appears thereon.

4. Counsel to the Debtors is filing this Certificate of No Objection not less than forty-eight (48) hours after the Objection Deadline.

**WHEREFORE**, the Debtors request that the Court enter the Proposed Orders attached as Exhibit A to each of the FTS Application and the EY Application at the Court's earliest convenience.

**PLEASE TAKE NOTICE** that the relief requested in the Applications will be granted upon entry of the Proposed Orders, and the hearing on the Applications, formerly scheduled for September 14, 2021 at 10:00 a.m. (Eastern Time), will be cancelled.

Dated: September 9, 2021  
New York, NY

**SIMPSON THACHER & BARTLETT LLP**

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