

**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)

**SCHEDULING ORDER REGARDING  
DISCLOSURE STATEMENT AND CASE MOTIONS**

The following schedule shall govern the deadlines for filing Case Dispositive Motions<sup>2</sup> and objections and replies to the Debtors’ Disclosure Statement Approval Motion<sup>3</sup> absent further agreement of the parties or order of the Court:

1. VRG<sup>4</sup> and VarigLog<sup>5</sup> shall have until **October 1, 2021** to file any Case Dispositive Motions.

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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> As used herein “**Case Dispositive Motion**” means any motion, pleading, objection or otherwise, filed by VRG or VarigLog seeking an order (i) dismissing these Chapter 11 cases, (ii) providing for the Court to abstain from hearing these Chapter 11 cases, (iii) converting these Chapter 11 cases to cases under Chapter 7, (iv) appointing a Chapter 11 trustee or examiner, and/or (v) any other relief expressly reserved for the litigation claimants by the *Order (I) Establishing a Deadline for the Filing of Proofs of Claim Asserting the Litigation Claims Against the Debtors and (II) Approving the Form and Notice Thereof* [Docket No. 104] at ¶ 8.

<sup>3</sup> As used herein, “**Disclosure Statement Approval Motion**” means *Debtors’ Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing a Voting Record Date; (III) Establishing Procedures for the Rejection of Executory Contracts and Unexpired Leases; (IV) Establishing a Schedule for Objections to Litigation Claims and Hearing Case Motions; (V) Approving Solicitation Packages and Solicitation Procedures; (VI) Approving the Forms of Ballots; (VII) Establishing Voting and Tabulation Procedures; and (VIII) Establishing Notice and a Schedule for Confirmation of the Plan* filed September 9, 2021 [Docket No. 138]. Capitalized terms used but not defined herein shall the meanings ascribed to such terms in the Disclosure Statement Approval Motion.

<sup>4</sup> “**VRG**” means VRG Linhas Aéreas S.A (n/k/a GOL Linhas Aéreas S.A.).

<sup>5</sup> “**VarigLog**” means Vanio Cesar Pickler Aguiar, Judicial Administrator and Foreign Representative of the Bankruptcy Estate of Varig Logistica S.A.



2. Debtors shall have until **October 22, 2021 at 4:00 p.m.** (prevailing Eastern Time) to object to any Case Dispositive Motions (“***Debtors’ Case Dispositive Motions Objection(s)***”).
3. If, after the receipt and review of the Debtors’ Case Dispositive Motions Objection(s), VRG and/or VarigLog believe discovery is necessary in connection with the Case Dispositive Motions, VRG and/or VarigLog, on the one hand, and the Debtors on the other hand, shall meet and confer in an effort to consensually resolve any discovery issues.
4. The Court shall hold a status conference on **October 28, 2021 at 10:00 a.m.** (prevailing Eastern Time) to address, among other things, any outstanding discovery issues and/or whether the remainder of the schedule set forth herein should be revised or modified. All dates subsequent to the status conference are subject to change pending direction by and/or order of the Court, or the consent of the parties.
5. Subject to paragraph 4 above, VRG and VarigLog shall have until **November 9, 2021 at 4:00 p.m.** (prevailing Eastern Time) to reply to Debtors’ Case Dispositive Motion Objection(s).
6. Subject to paragraph 4 above, all parties shall have until **November 9, 2021 at 4:00 p.m.** (prevailing Eastern Time) to file objections to the Debtors’ Disclosure Statement.
7. Subject to paragraph 4 above, Debtors shall have until **November 12, 2021 at 4:00 p.m.** (prevailing Eastern Time) to reply to Disclosure Statement objections.
8. Subject to paragraph 4 above, the Court shall hold a hearing on **November 16, 2021 at 10:00 a.m.** (prevailing Eastern Time) to consider Debtors’ Disclosure Statement Approval Motion and any filed Case Dispositive Motions (along with any objections or replies in connection therewith filed on the docket of these Chapter 11 Cases).
9. This Scheduling Order is without prejudice to any rights, claims or defenses any party may have.

Dated: New York, New York  
September 21, 2021

s/ David S. Jones  
Honorable David S. Jones  
United States Bankruptcy Judge