

Presentment Date and Time: January 21, 2022 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: January 18, 2022 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., *et al.*,) Case No. 21-11255 (DSJ)
)
Debtors.¹) (Jointly Administered)
)

**NOTICE OF PRESENTMENT OF AN ORDER FURTHER EXTENDING THE
DEBTORS' TIME TO FILE THE INITIAL 2015.3 REPORT**

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 “**Motion**”).²

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,*

¹ 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, 22nd Floor, New York, New York 10022.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.



and the Initial Rule 2015.3 Financial Report; and (II) Granting Related Relief [Docket No. 32] (the “**First Extension Order**”). Among other relief, the First Extension Order extended the time by which the Debtors must file the initial 2015.3 Report for a total of forty-five (45) days after the initial section 341 meeting, without prejudice to the Debtors’ right to seek additional extensions or a waiver.

PLEASE TAKE FURTHER NOTICE that on September 27, 2021, the Court entered the *Order Further Extending the Debtors’ Time to File the Initial 2015.3 Report* [Docket No. 167] (the “**Second Extension Order**”, and together with the First Extension Order, the “**Extension Orders**”). The Second Extension Order extended the time by which the Debtors must file the initial 2015.3 Report for an additional ninety (90) days after the deadline established by the First Extension Order, without prejudice to the Debtors’ right to seek additional extensions or a waiver. 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 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 ninety (90) day extension of the time by which the Debtors must file the initial 2015.3 Report to March 29, 2022. The Debtors own certain non-debtor special-purpose entities that no longer own any operating companies and have liquidated substantially all of their assets, and therefore 2015.3 Reports would offer limited benefit to parties in interest because there are limited, if any, assets that would be available for payment of claims against the Debtors. In view of these circumstances,

and based on the US Trustee's guidance, in lieu of requesting a waiver of the requirement to file 2015.3 Reports, the Debtors intend to continue requesting extensions of time by which they must file the initial 2015.3 Report for the remainder of these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that in accordance with the Extension Orders, the Debtors provided notice to the US Trustee that the Debtors are seeking this extension. Further, in accordance with the Extension Orders, 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 the Initial 2015.3 Report* (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. 501, New York, New York 10004, on **January 21, 2022 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 No. 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 website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **January 18, 2022, at 4:00 p.m. (prevailing Eastern Time)**, by (i) the U.S. Trustee, (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 and david.zylberberg@stblaw.com)), counsel for the Debtors, (iii) counsel to VRG and (iv) counsel to

VarigLog. 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 the 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 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, (ii) contacting the Office of the Clerk of the Court at One Bowling Green, New York, New York 10004, or (iii) from the Debtors’ claims and noticing agent, Kurtzman Carson Consultants LLC (“*KCC*”), by e-mail at MPIIInfo@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.

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Dated: January 11, 2022
New York, NY

SIMPSON THACHER & BARTLETT LLP

/s/ Elisha D. Graff
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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**

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

**ORDER FURTHER EXTENDING THE DEBTORS' TIME TO FILE
THE INITIAL 2015.3 REPORT**

Upon the notice of presentment, dated January 11, 2022 (the “*Notice of Presentment*”)² 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 the initial 2015.3 Report, 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; and this Court

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² 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.

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 the initial 2015.3 Report for all Debtors is extended to March 29, 2022, 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 a notice of appearance and request for service of documents in these Chapter 11 Cases, and in such event (i) the deadline for the Debtors to file the initial 2015.3 Report 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: _____, 2022

HONORABLE DAVID S. JONES
UNITED STATES BANKRUPTCY JUDGE