

**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)
)	

CASE DISPOSITIVE MOTIONS SCHEDULING ORDER

The following schedule, submitted jointly and agreed to by and among (i) the above captioned debtors and debtors in possession (collectively, the “**Debtors**”); (ii) GOL Linhas Aéreas S.A. (formerly VRG Linhas Aéreas S.A.) (“**VRG**”); and (iii) Vanio Cesar Pickler Aguiar, not individually but as judicial administrator of the bankruptcy estate of Varig Logistica, S.A. (“**VarigLog**”) shall govern the briefing schedule in respect of the Case Dispositive Motions² absent further agreement of the parties or order of the Court:

1. VRG and VarigLog shall have until **February 1, 2022 at 4:00 p.m.** (prevailing Eastern Time) to file their replies (the “**Replies**”) to the Debtors’ Omnibus Opposition.³ Such replies will not include any affidavits or other evidence except for references (i) to papers already filed in the case, (ii) documents already produced in the case, and (iii) to the transcript of the 30(b)(6) deposition. The Replies will be limited to 25 pages each.

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 As used herein “**Case Dispositive Motions**” means (a) the *Motion by VRG for Entry of an Order (I)(A) Converting these Chapter 11 Cases to Cases under Chapter 7, and Prior Thereto (B) Having this Court Abstain from Addressing VRG’s Claims in Deference to the Cayman Islands Proceedings, or, in the alternative, (II) Lifting the Automatic Stay with respect to the Cayman Islands Proceedings* [Docket No. 181], (b) the *Motion by the Foreign Representative of Varig Logistica S.A. to Convert these Chapter 11 Cases to Chapter 7 Cases pursuant to 11 U.S.C. § 1112(b)* [Docket No. 178], and (c) the *Statement of Judgment Creditor HJDK Aerospacial Inc. A/K/A HJDK Aerospacial SA in Support of the Motions by Gol Linhas S.A., Formerly VRG Aereas Linhas S.A. and the Foreign Representative of the Bankruptcy Estate of Varig Logistica S.A. to Convert These Chapter 11 Cases to Cases Under Chapter 7 of the U.S. Bankruptcy Code* [Docket No. 225].

³ As used herein, “**Debtors’ Omnibus Opposition**” means *Debtors’ Omnibus Opposition to (I) Motion by VRG to Convert These Cases to Chapter 7 Cases, and Prior Thereto, to Have This Court Abstain From Addressing VRG’s Claims, or In the Alternative, to Grant VRG Relief from the Automatic Stay; and (II) Motion by VarigLog to Convert These Cases to Chapter 7 Cases* [Docket No 203].



2. The United States Trustee and any other party in interest shall have until **February 1, 2022 at 4:00 p.m.** (prevailing Eastern Time) to file any pleading in connection with the Case Dispositive Motions.
3. The Debtors shall have until **February 11, 2022 at 4:00 p.m.** (prevailing Eastern Time) to file a sur-reply (the “***Sur-Reply***”) to the Replies. Such Sur-Reply will be limited to 25 pages and limited in scope to responding to (i) only those issues raised in the Replies that can be classified as either (a) new relief or new, different grounds for the relief requested beyond those already set forth in the Case Dispositive Motions, or (b) relating to the 30(b)(6) deposition transcript; and (ii) any opposition or response to any filing made pursuant to paragraph 2 herein. Such Sur-Reply will not include any affidavits or other evidence except for references to the transcript of the 30(b)(6) deposition and documents already produced in the case.
4. VRG and VarigLog shall have until **February 18, 2022 at 4:00 p.m.** (prevailing Eastern Time) to file a sur-sur-reply (the “***Sur-Sur-Reply***”) to the Debtors’ Sur-Reply and which Sur-Sur-Reply shall be limited to 15 pages each and limited in scope to responding to (i) the Debtors’ Sur-Reply or (ii) any filings pursuant to paragraph 2 herein, including any subsequent Debtors’ response in connection therewith.
5. The Court shall hold a status conference on **February 24, 2022 at 10:00 a.m.** (prevailing Eastern Time) (or such other time as may be convenient for the Court) to (i) address whether the hearing on the Case Dispositive Motions and related pleadings will be an evidentiary hearing or a non-evidentiary hearing, and (ii) fix the date and time for such hearing.

Dated: New York, New York
January 21, 2022

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