

Hearing Date and Time: July 7, 2022 at 10:00 am
Objection Date and Time: June 16, 2022 at 4:00 pm
Reply Date and Time: June 30, 2022 at 4:00 pm

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*Counsel for Vanio Cesar Pickler Aguiar,
not individually but as judicial administrator
and foreign representative (the "Foreign Representative")*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	: :
MATLINPATTERSON GLOBAL	: Case No. 21-11255 (DSJ)
GLOBAL OPPORTUNITIES	: :
PARTNERS II L.P., <i>et al.</i> , ¹	: :
	: :
Debtors.	: :
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**SECOND AMENDED NOTICE OF HEARING BY FOREIGN REPRESENTATIVE OF
VARIG LOGISTICA S.A. FOR (I) ABSTENTION IN DEFERENCE TO PENDING
FOREIGN PROCEEDING OR, ALTERNATIVELY FOR (II) STAY RELIEF**

PLEASE TAKE NOTICE that a hearing on the *Motion by Foreign Representative of
Varig Logistica S.A. for (i) Abstention in Deference to Pending Foreign Proceeding or,*

¹ The debtors (collectively, 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) ("MP Delaware"); MatlinPatterson Global Opportunities Partners (Cayman) II L.P. (8246) ("MP Cayman," and with MP Delaware, the "MP Funds"); MatlinPatterson Global Partners II LLC (6962) ("General Partner," and with the MP Funds, the "MP Defendants"); MatlinPatterson Global Advisers LLC (2931); MatlinPatterson PE Holdings LLC (6900); Volo Logistics LLC (8287); MatlinPatterson Global Opportunities Partners (SUB) II L.P. (9209) ("SUB II").



Alternatively, for (ii) Stay Relief (the “Motion”), filed by Vânio Cesar Pickler Aguiar (the “Foreign Representative”), not individually but as Judicial Administrator of the bankruptcy estate of Varig Logistica S.A. (“VarigLog Estate”), on March 15, 2022, will be held over Zoom before the Honorable David S. Jones, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (“Court”), One Bowling Green, Courtroom No. 501, New York, New York 10004, on **July 7, 2022, at 10:00 a.m.** (“Hearing”).

PLEASE TAKE FURTHER NOTICE that due to the COVID-19 pandemic and in accordance with the Court’s General Order M-543, dated March 20, 2020, the Hearing on the Motion will only be conducted via Zoom.² Parties should not appear in person and those wishing to participate in the Hearing are required to register their appearance by 4:00 p.m. (prevailing Eastern Time) the day before the Hearing at <https://ecf.nysb.uscourts.gov/cgibin/nysbAppearances.pl>.³

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Motion 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 website at <http://www.nysb.uscourts.gov>); (d) be delivered to the Chambers of the Honorable

² A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/generalorderm-543-court-operations-under-exigent-circumstances-created-covid-19>.

³ Instructions on how to register can be obtained by visiting <https://www.nysb.uscourts.gov/zoom-videohearingguide>.

David S. Jones in accordance with his Chambers' Rules; and (e) be served so as to be actually received by **June 16, 2022, at 4:00 p.m.**, by Sequor Law, P.A., 1111 Brickell Avenue, Suite 1250, Miami, Florida 33131 (Attn: Gregory Grossman and Juan Mendoza).

PLEASE TAKE FURTHER NOTICE that only those responses that are timely filed, served, and received will be considered at the Hearing. In the event that no objection or response to the Motion is timely filed and served, the relief requested in the Motion may be granted without a hearing before the Court.

Dated: April 20, 2022

Respectfully submitted,

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