

Hearing Date and Time: August 17, 2022 at 10:00 a.m. (Eastern Time)
Objection Deadline: August 10, 2022 at 4:00 p.m. (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)
)

**AMENDED NOTICE OF HEARING ON INTERIM FEE APPLICATIONS FILED BY
SIMPSON THACHER & BARTLETT LLP, VERNON FLYNN QC, ERNST & YOUNG
LTD., AND SCHULTE ROTH & ZABEL LLP FOR THE PERIOD FROM
FEBRUARY 1, 2022 THROUGH AND INCLUDING APRIL 30, 2022**

PLEASE TAKE NOTICE that on May 31, 2022, Simpson Thacher & Bartlett LLP (“*Simpson Thacher*”) filed the *Third Interim Fee Application of Simpson Thacher & Bartlett LLP for Compensation for Services and Reimbursement of Expenses as Counsel to the Debtors for the Period from February 1, 2022 Through and Including April 30, 2022* (the “*STB Interim Fee Application*”).

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: 300 East 95th Street, Suite 102, New York, New York 10128.



PLEASE TAKE FURTHER NOTICE that on May 31, 2022, Vernon Flynn QC (“**Mr. Flynn**”) filed the *First Interim Fee Application of Vernon Flynn QC for Compensation for Professional Services as Special Litigation Counsel to the Debtors for the Period from February 1, 2022 Through and Including April 30, 2022* (the “**Vernon Flynn Interim Fee Application**”).

PLEASE TAKE FURTHER NOTICE that on May 31, 2022, Ernst & Young Ltd. (“**EY Ltd.**”) filed the *Second Interim Fee Application of Ernst & Young Ltd. for Compensation and Reimbursement of Expenses Incurred as Audit Services Provider for the Debtors for the Period from February 1, 2022 Through and Including April 30, 2022* (the “**EY Ltd. Interim Fee Application**”).

PLEASE TAKE FURTHER NOTICE that on May 31, 2022, Schulte Roth & Zabel LLP (“**Schulte**”) filed the *Third Interim Fee Application of Schulte Roth & Zabel LLP as Conflicts Counsel to the Debtors in Possession for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from February 1, 2022 Through and Including April 30, 2022* [Docket No. 441] (the “**Schulte Interim Fee Application**” and, together with the STB Interim Fee Application, the Vernon Flynn Interim Fee Application and the EY Ltd. Interim Fee Application, the “**Interim Fee Applications**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Interim Fee Applications 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 (the “**Court**”), One Bowling Green, Courtroom No. 501, New York, New York 10004, on **August 17, 2022 at 10:00 a.m. (prevailing Eastern Time)**.

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 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) on August 16, 2022** at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.³

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Interim Fee Applications 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>); and (d) be served so as to be actually received by **August 10, 2022 at 4:00 p.m. (prevailing Eastern Time)** (the "***Objection Deadline***"), by (i) the U.S. Trustee for the Southern District of New York, (ii) (x) with respect to the STB Interim Fee Application, the Vernon Flynn Interim Fee Application and the EY Ltd. Interim Fee Application, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Elisha D. Graff, Kathrine A. McLendon and Jamie J. Fell (emails: egraff@stblaw.com, kmclendon@stblaw.com, and jamie.fell@stblaw.com)), counsel for the Debtors and (y) with respect to the Schulte Interim Fee Application, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, New York 10022, Attn: Adam C. Harris (Adam.Harris@srz.com) and Kelly Koscuizka (Kelly.Koscuizka@srz.com) conflicts counsel to the Debtors, (iii) counsel

² A copy of the General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/general-order-m-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-video-hearing-guide>.

to VRG, (iv) counsel to VarigLog, and (v) with respect to the EY Ltd. Interim Fee Application, EY Ltd.

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the hearing. Objecting parties are required to attend the hearing and failure to appear may result in relief being granted upon default. In the event that no objection to the Interim Fee Applications is timely filed and served, the relief requested in the Interim Fee Applications may be granted without a hearing before the Court.

PLEASE TAKE FURTHER NOTICE that in accordance with the *Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 105] (the “**Interim Compensation Order**”), if the Interim Fee Applications are uncontested, the Court, in its discretion, may approve the Interim Fee Applications without the need for a hearing. If no responses are timely filed and served, Mr. Flynn, Simpson Thacher, Schulte, and EY Ltd. may, after the Objection Deadline, submit a proposed order to the Court granting the Interim Fee Applications, which may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Interim Fee Applications may be obtained from the Court’s website, <https://ecf.nysb.uscourts.gov> for a nominal fee, or free of charge, from the website of the Debtors’ claims and noticing agent, <http://kccllc.net/mpii>.

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Dated: June 27, 2022
New York, NY

SIMPSON THACHER & BARTLETT LLP

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