

Hearing Date and Time: December 22, 2022 at 10:00 a.m. (prevailing Eastern Time)

Objection Deadline: December 15, 2022 at 4:00 p.m. (prevailing Eastern Time)

Elisha D. Graff
Kathrine A. McLendon
Jamie J. Fell
Dov Gottlieb
SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, NY 10017
Tel: (212) 455-2000
Fax: (212) 455-2502

Tyler B. Robinson
Lauren W. Brazier (admitted *pro hac vice*)
SIMPSON THACHER & BARTLETT LLP
CityPoint
One Ropemaker Street
London EC2Y 9HU, England
Tel: +44-(0)20-7275-6500
Fax: +44-(0)20-7275-6592

Counsel to the Debtors and Debtors-in-Possession

NOTICE OF INTERIM FEE APPLICATIONS

PLEASE TAKE NOTICE that on the date hereof, Simpson Thacher & Bartlett LLP (“*Simpson Thacher*”) filed the *Fifth 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 August 1, 2022 Through and Including October 31, 2022* (the “*STB Interim Fee Application*”).

PLEASE TAKE FURTHER NOTICE that on the date hereof, LDCM Advogados (“*LDCM*”) filed the *First Interim Fee Application of LDCM Advogados for Compensation for Services as Special Brazilian Counsel to the Debtors for the Period from June 21, 2022 Through and Including October 31, 2022* (the “*LDCM Interim Fee Application*”).

PLEASE TAKE FURTHER NOTICE that on November 23, 2022, Schulte Roth & Zabel LLP (“*Schulte*”) filed the *Fifth 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 August 1, 2022 Through and Including October 31, 2022* [Docket No. 691] (the “*Schulte Interim Fee Application*” and, together with the STB Interim Fee Application and LDCM 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 **December 22, 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.¹ 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 December 21, 2022** at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.²

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 **December 15, 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

¹ 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>.

² Instructions on how to register can be obtained by visiting <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

the STB Interim Fee Application and LDCM 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 Koscuiszka (Kelly.Koscuiszka@srz.com) conflicts counsel to the Debtors, (iii) counsel to VRG, and (iv) counsel to VarigLog.

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 any Interim Fee Application 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 any Interim Fee Application is uncontested, the Court, in its discretion, may approve the Interim Fee Application without the need for a hearing. If no responses are timely filed and served, Simpson Thacher, Schulte and LDCM 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>.

Dated: November 30, 2022
New York, NY

SIMPSON THACHER & BARTLETT LLP

/s/ Elisha D. Graff
Elisha D. Graff
Kathrine A. McLendon
Jamie J. Fell
Dov Gottlieb
425 Lexington Avenue
New York, NY 10017
Tel: (212) 455-2000
Fax: (212) 455-2502

-and-

Tyler B. Robinson
Lauren W. Brazier (admitted *pro hac vice*)
CityPoint
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London EC2Y 9HU, England
Tel: +44-(0)20-7275-6500
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