

Hearing Date and Time: August 17, 2023 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: August 10, 2023 at 4:00 p.m. (prevailing Eastern Time)

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NOTICE OF FINAL FEE APPLICATIONS

PLEASE TAKE NOTICE that on the date hereof, the following documents were filed:

(i) the *Final Fee Application of Simpson Thacher & Bartlett LLP for Compensation for Services and Reimbursement of Expenses as Counsel to the Debtors for the Period from July 6, 2021 Through and Including June 1, 2023* (the “**Simpson Application**”); (ii) the *Final 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 July 6, 2021 Through and Including June 1, 2023* (the “**Schulte Application**”); (iii) the *Monthly Fee Statement and Final Fee Application of LDCM Advogados for Compensation for Services as Special Brazilian Counsel to the Debtors for the Period from July 6, 2021 Through and Including June 1, 2023* (the “**LDCM Application**”); (iv) the *Final Fee Application of Ernst & Young Ltd. for Compensation and Reimbursement of Expenses Incurred as Audit Services Provider for Debtors for the Period From July 6, 2021 Through and Including June 1, 2023* (the “**EY Audit Application**”); (v) the *Third Interim and Final Fee Application of Ernst & Young LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Tax Services Provider for Debtors for the Period From July 6, 2021 Through and Including June 1, 2023* (the “**EY Tax Application**”); (vi) the *Final Fee Application of Vernon Flynn QC for Compensation for*



Professional Services as Special Litigation Counsel to the Debtors for the Period from July 6, 2021 Through and Including June 1, 2023 (the “VF Application”); (vii) the Final Fee Application of Kurtzman Carson Consultants LLC as Administrative Advisor for the Debtors for Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from July 6, 2021 Through and Including June 1, 2023 (the “KCC Application”); and (viii) the Final Fee Application of FTS US Inc. for Compensation for Services as Provider of Tax Consulting Services to the Debtors for the Period from July 6, 2021 Through and Including June 1, 2023 (the “FTS Application” and collectively, the “Final Fee Applications”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Final 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, 2023 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 August 16, 2023** at **<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>**.²

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>.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Final 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, 2023 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 Schulte 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, and (y) with respect to the Simpson Application, LDCM Application, EY Audit Application, EY Tax Application, KCC Application, VF Application and FTS Application, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Elisha D. Graff and Jamie J. Fell (emails: egraff@stblaw.com and jamie.fell@stblaw.com)), counsel for 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 the Final Fee Applications is timely filed and served, the relief requested in the Final 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 Final Fee Application is uncontested, the Court, in its discretion, may approve the Final Fee Application without the need for a hearing. If no responses are timely filed and served, Simpson may, after the Objection Deadline, submit a proposed order to the Court granting the Final Fee Applications, which may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Final 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: July 17, 2023
New York, NY

SIMPSON THACHER & BARTLETT LLP

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