

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

*In re:*

NEWPAGE CORPORATION,

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 11-12804 (KG)

Jointly Administered

RE: Docket No. 5136

**CERTIFICATION OF COUNSEL REGARDING MOTION OF LITIGATION  
TRUSTEE, PURSUANT TO SECTION 105(A) OF THE BANKRUPTCY  
CODE, FOR ENTRY OF ORDER (I) IMPLEMENTING WIND-UP  
PROCEDURES AND (II) EXTENDING LITIGATION TRUST**

On July 20, 2018, the Litigation Trustee filed the **Motion of Litigation Trustee, Pursuant to Section 105(a) of the Bankruptcy Code, for Entry of Order (I) Implementing Wind-Up Procedures and (II) Extending Litigation Trust** [D.I. 5136] (the "Motion").<sup>2</sup> Attached as Exhibit A to the Motion was a proposed form of order (the "Proposed Order"). The deadline to file objections to the Motion (the "Objection Deadline") was 4:00 p.m. (ET) on August 3, 2018. The Objection Deadline was extended for the Reorganized Debtors.

Subsequent to the filing of the Motion, the Litigation Trustee received informal comments from the Reorganized Debtors. The issues raised by the Reorganized Debtors have been resolved without any changes to the Proposed Order. The undersigned hereby certifies that, as of the date hereof, she has received no other answer, objection, or other responsive pleading to the Motion, and that a review of the Court's docket in these cases reflects that no answer, objection, or other responsive pleading to the Motion appears thereon. The undersigned also certifies that the Reorganized Debtors have no objection to entry of the Proposed Order.

<sup>1</sup> The last four digits of NewPage Corporation's federal tax identification number are 6156. The corporate headquarters of NewPage Corporation is located at 8540 Gander Creek Drive, Miamisburg, OH 45342.

<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion.



It is hereby respectfully requested that the Proposed Order, in the form attached to the Motion, be entered at the earliest convenience of the Court without further notice or hearing.

Dated: Wilmington, Delaware  
December 19, 2018

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