

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
	§	
SPEEDCAST INTERNATIONAL	§	
LIMITED, <i>et al.</i> ,	§	Case No. 20-32243 (MI)
	§	
Reorganized Debtors. ¹	§	(Jointly Administered)
	§	

NOTICE OF FILING OF PROPOSED
REVISED ORDER (I) APPROVING OMNIBUS CLAIMS
OBJECTIONS PROCEDURES AND FILING OF SUBSTANTIVE
OMNIBUS CLAIMS OBJECTIONS, (II) WAIVING THE REQUIREMENT
OF BANKRUPTCY RULE 3007(E)(6) AND (III) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE THAT:

1. On August 5, 2021, SpeedCast International Limited and its reorganized debtor affiliates in the above-captioned chapter 11 case (collectively, the “**Reorganized Debtors**”) filed the proposed *Order (I) Approving Omnibus Claims Objections Procedures and Filing of Substantive Omnibus Claims Objections, (II) Waiving the Requirement of Bankruptcy Rule 3007(e)(6) and (III) Granting Related Relief* (ECF No. 1701) (the “**Initial Proposed Order**”).

2. The Reorganized Debtors hereby file a revised proposed *Order (I) Approving Omnibus Claims Objections Procedures and Filing of Substantive Omnibus Claims Objections, (II) Waiving the Requirement of Bankruptcy Rule 3007(e)(6) and (III) Granting Related Relief*, (the “**Revised Proposed Order**”) attached here to as **Exhibit 1**.

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.



3. A redline of the Revised Proposed Order to the Initial Proposed Order is attached hereto as **Exhibit 2**.

Dated: September 17, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez (15776275)
Brenda L. Funk (24012664)
Stephanie N. Morrison (admitted *pro hac vice*)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Alfredo.Perez@weil.com
Brenda.Funk@weil.com
Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Gary T. Holtzer (admitted *pro hac vice*)
David N. Griffiths (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Gary.Holtzer@weil.com
David.Griffiths@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Paul R. Genender (00790758)
Amanda Pennington Prugh (24083646)
Jake R. Rutherford (24102439)
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7877
Facsimile: (214) 746-7777
Email: Paul.Genender@weil.com
Amanda.PenningtonPrugh@weil.com
Jake.Rutherford@weil.com

Attorneys for Reorganized Debtors

Certificate of Service

I hereby certify that on September 17, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i>, Reorganized Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 20-32243 (MI) (Jointly Administered)
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**ORDER (I) APPROVING OMNIBUS CLAIMS
OBJECTIONS PROCEDURES AND FILING OF SUBSTANTIVE
OMNIBUS CLAIMS OBJECTIONS, (II) WAIVING THE REQUIREMENT
OF BANKRUPTCY RULE 3007(E)(6) AND (III) GRANTING RELATED RELIEF**

Upon the motion, dated August 5, 2021 (the “**Motion**”),² of SpeedCast International Limited and its debtor affiliates in the above-captioned chapter 11 cases, as reorganized debtors (collectively, the “**Debtors**”, as reorganized, the “**Reorganized Debtors**”), (a) approving the Objection Procedures attached hereto as **Exhibit 1**, (b) waiving the requirement in Bankruptcy Rule 3007(e)(6) that Omnibus Objections contained objections to no more than 100 claims and (c) granting related relief, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion; and

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection Procedures in **Exhibit 1** and Motion.

all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interest of the Reorganized Debtors and their respective estates and creditors; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Reorganized Debtors (or any successors thereto), may file Omnibus Objections that include objections to Claims on any basis provided for in Bankruptcy Rule 3007(d), Local Rule 3007-1, and/or the Additional Grounds.

2. The Reorganized Debtors (or any successors thereto), may object to more than 100 claims in a single Omnibus Objection on any of the bases set forth in Bankruptcy Rule 3007(d) and/or the Additional Grounds.

3. The Reorganized Debtors (or any successors thereto) shall be authorized to file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are hereby approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e) and Local Rule 3007-1.

4. The form of Objection Notice attached hereto as **Exhibit 2** is hereby approved.

5. Nothing in this Order shall affect the Reorganized Debtors' (or any successors thereto) authority to pay claims to the extent authorized by a separate order of the Court.

6. Nothing in this Order shall obligate the Reorganized Debtors (or any successors thereto) to settle or pursue settlement of any particular claim. Settlements of claims may be negotiated and compromised by the Reorganized Debtors in their sole discretion (subject to applicable law).

7. For the avoidance of doubt, the Reorganized Debtors may include objections to Proofs of Claim and scheduled Claims in Omnibus Objections.

8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order, the Motion, or the Objection Procedures shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

10. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2021
Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i>, Reorganized Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 20-32243 (MI) (Jointly Administered)
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PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “**Omnibus Objection**”) to claims on the grounds that such claims, in part or in whole:

- (a) fail to specify the asserted claim amount (other than “unliquidated”);
- (b) were, in whole or in part paid prepetition or paid post-petition pursuant to an order entered by the Court or are satisfied by payment in full on account of such Claim from a party that is not a Reorganized Debtor;
- (c) assert rejection damages claims exceed the maximum allowable amount of such claims under section 502(b)(6) of the Bankruptcy Code;
- (d) are incorrectly or improperly classified under the Bankruptcy Code or the Plan;
- (e) have been formally withdrawn by the claimant through the filing of a pleading or through the entry of a Court order indicating withdrawal of the Claim;
- (f) are filed against non-Debtors;
- (g) fail to specify a Reorganized Debtor against whom the Claim is asserted;
- (h) are disallowed pursuant to, or asserted in an amount, priority, or on terms

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

that are otherwise inconsistent with the Plan; or

- (i) are unenforceable against a Debtor or Reorganized Debtor or property thereof, under any agreement or applicable law for a reason other than because such claims are contingent or unmatured.

2. Form of Omnibus Objection. Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. Supporting Documentation. For all Omnibus Objections under 1(j), above, and otherwise to the extent appropriate, Omnibus Objections shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the claims in accordance with Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. Including an Omnibus Objection on one exhibit will not constitute a waiver of the Reorganized Debtors' right to object to the Claim on an additional basis or bases. The exhibits will include, without limitation, the following information alphabetized by claimant:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the proof of claim number or schedule number related thereto from the claims register;
- (b) the asserted amount of the claim;
- (c) the grounds for the objection;
- (d) a cross-reference to the section of the Omnibus Objection discussing such claim; and
- (e) other information, as applicable, including: (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify; (ii) the claim amounts of Claims the Reorganized Debtors seek to reduce; or (iii) the surviving claim amount, if any, of claimants affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the “**Objection Notice**”), which will:

- (a) adequately describe the nature of the objection;
- (b) inform creditors that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a “**Response**”); to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information;
- (e) include an exhibit listing the names of all creditors that are subject to the Omnibus Objection, along with reference to the particular exhibits of the Omnibus Objection on which their Claims are listed; and
- (f) describe how copies of proofs of claim, the Omnibus Objection, and other pleadings filed in the chapter 11 cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court’s electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be mailed to each claimholder that is subject to such objection.

7. Omnibus Claims Objection Hearings. Each Omnibus Objection may be set for a hearing no less than 30 days after service of the Omnibus Objection (each, a “**Hearing**”), unless the Court orders otherwise. In the applicable Reorganized Debtor’s discretion, each Omnibus Objection may be filed either (i) with a Hearing date already scheduled in coordination with the Court; or (ii) filed without a Hearing date with the intent of scheduling a Hearing date in the event one or more Responses is filed. Hearings will be conducted according to Local Rule 3007-1(d) such that, unless otherwise ordered by the Court or by consent of the parties, the initial Hearing will be non-evidentiary and used as a scheduling conference. Adjournments or continuances of claim objections hearings must either (i) be agreed and reflected in a claims

objection hearing agenda that is filed at least 24 hours prior to the scheduled hearing; or (ii) ordered by the Court on motion of any party. If a subsequent Hearing is necessary, the Reorganized Debtor shall file with the Court and serve on the affected claimant(s) a notice of the subsequent Hearing (the date of which shall be determined in consultation with the affected claimant(s) or announced on the record).

8. Entry of an Order Without a Hearing. For Claims subject to an Omnibus Objection for which no Response is filed and no appearance is made at a scheduled Hearing (if any), or a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the scheduled Hearing (if any), the applicable Reorganized Debtor may request at the scheduled Hearing, if any, that the Court enter an order granting the Omnibus Objection with respect to such claim. Furthermore, if no Hearing has been scheduled, the Reorganized Debtor may seek entry of an order granting the Omnibus Objection without further notice to the claimant or a Hearing with respect to any claim for which a Response was not filed in accordance with these procedures or for which a Response was consensually resolved with the claimant. Notwithstanding the foregoing, nothing in these procedures shall prejudice the Reorganized Debtors' right to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein pursuant to Section "Q" the Complex Case Rules.

9. Contested Matter. Each claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court, the Plan, and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the amount and validity of such contested Claims without any further notice to, or action, order, or

approval of, the Court.

Responses to Omnibus Objections

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the procedures set forth herein and to appear at the Hearing. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing, the Court may grant the objection with respect to such claim without further notice to the claimant.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Reorganized Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim;
- (c) the following contact information for the responding party:
 - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court not later than the day that is thirty (30) calendar days from the date the Omnibus Objection is served.

13. Discovery. If either the Reorganized Debtors or the claimant determines

that discovery is necessary in advance of a Hearing on an Omnibus Objection, such party will serve a notice on the other party and its counsel of record (if any) that a scheduling order with respect to the Omnibus Objection will be requested at the Hearing. Such notice may be incorporated into the agenda for the Hearing, or may be provided by separate notice.

14. Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the Hearing, if one is scheduled, may result in the Court granting the Omnibus Objection without further notice or Hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

15. Reply to a Response. The Reorganized Debtors shall be permitted to file a reply to any Response no later than two (2) business days before the Hearing with respect to the relevant Omnibus Objection.

Miscellaneous

16. Additional Information. Copies of these procedures, the Motion, the Proposed Order or any other pleadings filed in these chapter 11 cases are available at no cost at <http://www.kccllc.net/speedcast>

Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.

Exhibit 2

Objection Notice

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

SPEEDCAST INTERNATIONAL
LIMITED, *et al.*,

Reorganized Debtors.¹

§
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§

Chapter 11

Case No. 20-32243 (MI)

(Jointly Administered)

**NOTICE OF THE REORGANIZED DEBTORS' [NUMBER] OMNIBUS CLAIMS
OBJECTION**

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW OR MODIFY THE CLAIM THAT YOU FILED IN THESE BANKRUPTCY CASES. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT A HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

[A HEARING HAS BEEN SET ON THIS OBJECTION ON [DATE] AT [TIME] IN COURTROOM 404, 515 RUSK, HOUSTON, TEXAS 77002. YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AUDIO/VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE THROUGH THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE ISGUR'S CONFERENCE ROOM NUMBER IS 954554.

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING. APPLICATION. TO CONNECT, YOU SHOULD ENTER THE MEETING CODE “JUDGEISGUR” IN THE GOTOMEETING APP OR CLICK THE LINK ON JUDGE ISGUR’S HOME PAGE ON THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING. HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF THE HEARING. TO MAKE YOUR ELECTRONIC APPEARANCE, GO TO THE SOUTHERN DISTRICT OF TEXAS WEBSITE AND SELECT “BANKRUPTCY COURT” FROM THE TOP MENU. SELECT “JUDGES’ PROCEDURES,” THEN “VIEW HOME PAGE” FOR JUDGE ISGUR. UNDER “ELECTRONIC APPEARANCE” SELECT “CLICK HERE TO SUBMIT ELECTRONIC APPEARANCE”. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK “SUBMIT” TO COMPLETE YOUR APPEARANCE.]²

THIS OBJECTION SEEKS TO DISALLOW OR MODIFY CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT [●] THROUGH EXHIBIT [●] TO THE ORDER FILED WITH THIS OBJECTION.

Important Information Regarding the Objection

Grounds for the Objection. By the Objection, the Reorganized Debtors are seeking to [disallow/reclassify/reduce/subordinate] your claim(s) listed in the schedule attached hereto on the grounds that your claim(s) [is/are] [●]. The claim(s) subject to the [●] Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Objection Procedures. On [Date], the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) entered an order [ECF No. ●] approving procedures for filing and resolving objections to Claims asserted against the Reorganized Debtors in these chapter

² Information regarding appearance at a hearing will only be included to the extent the applicable omnibus objection filed with a hearing date is already scheduled.

11 cases (the “**Objection Procedures**”). A copy of the Objection Procedures is included with this notice. Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.

Resolving the Objection

Parties Required to File a Response. If you disagree with the Omnibus Objection filed with respect to your claim, you must file a response (each, a “**Response**”) with the Court by 4:00 p.m. (prevailing Central Time) on [●] 2021. Please review the Objection Procedures to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Reorganized Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim;
- (c) the following contact information for the responding party:
 - (iii) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant’s attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (iv) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant’s behalf.

Failure to Respond. **Failure to timely file a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing.³ If a Response is timely filed, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. Failure to appear at the initial hearing may result in the summary disposition of the objection.

[OR]

A hearing (the "**Hearing**") on the Omnibus Objection will be held on [Date], at [Time] prevailing Central Time, before the Honorable Marvin Isgur, United States Bankruptcy Judge, in Courtroom 404, 515 Rusk, Houston, Texas 77002. You may participate in the Hearing via audio/video connection with the instructions included at the top of this Notice. Adjournments or continuances of claim objections hearings must either (i) be agreed and reflected in a claims objection hearing agenda that is filed at least 24 hours prior to the scheduled hearing; or (ii) ordered by the Court on motion of any party. Unless you have resolved your claim with the Reorganized Debtor, you must attend the Hearing if you disagree with the Omnibus Objection and have filed a Response.

Discovery. If either the Reorganized Debtors or the claimant determines that discovery is necessary in advance of a Hearing on an Omnibus Objection, such party will serve a notice on the other party and its counsel of record (if any) that a scheduling order with respect to the Omnibus Objection will be requested at the Hearing. Such notice may be incorporated into the agenda for the Hearing, or may be provided by separate notice.

Additional Information

Questions or Information. Copies of these procedures, the Motion, the Proposed

³ This section will be altered to reflect whether a Hearing has been scheduled in advance of the filing of the applicable Omnibus Objection

Order or any other pleadings filed in these chapter 11 cases are available at no cost at <http://www.kcellc.net/speedcast>. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.txs.uscourts.gov/bankruptcy>. Please do not contact the Court to discuss the merits of any Claim or any Omnibus Objection filed with respect thereto.

Reservation of Rights

Nothing in any Omnibus Objection or Objection Notice shall be deemed:

- (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law;**
- (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates;**
- (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or**
- (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.**

Dated: [●], 2021
Houston, Texas

Respectfully submitted,

/s/ DRAFT

WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez (15776275)
Brenda L. Funk (24012664)
Stephanie N. Morrison (admitted *pro hac vice*)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Alfredo.Perez@weil.com
Brenda.Funk@weil.com
Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Gary T. Holtzer (admitted *pro hac vice*)
David N. Griffiths (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Gary.Holtzer@weil.com
David.Griffiths@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Paul R. Genender (00790758)
Amanda Pennington Prugh (24083646)
Jake R. Rutherford (24102439)
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7877
Facsimile: (214) 746-7777
Email: Paul.Genender@weil.com
Amanda.PenningtonPrugh@weil.com
Jake.Rutherford@weil.com

Attorneys for the Reorganized Debtors

Exhibit 2

Redline

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: SPEEDCAST INTERNATIONAL LIMITED, et al., Reorganized Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 20-32243 (MI) (Jointly Administered)
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**ORDER (I) APPROVING OMNIBUS CLAIMS
OBJECTIONS PROCEDURES AND FILING OF SUBSTANTIVE
OMNIBUS CLAIMS OBJECTIONS, (II) WAIVING THE REQUIREMENT
OF BANKRUPTCY RULE 3007(E)(6) AND (III) GRANTING RELATED RELIEF**

Upon the motion, dated August 15, 2021 (the “**Motion**”),² of SpeedCast International Limited and its debtor affiliates in the above-captioned chapter 11 cases, as reorganized debtors (collectively, the “**Debtors**”, as reorganized, the “**Reorganized Debtors**”), (a) approving the Objection Procedures attached hereto as **Exhibit 1**, (b) waiving the requirement in Bankruptcy Rule 3007(e)(6) that Omnibus Objections contained objections to no more than 100 claims and (c) granting related relief, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection Procedures in **Exhibit 1** and Motion.

been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interest of the Reorganized Debtors and their respective estates and creditors; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Reorganized Debtors (or any successors thereto), may file Omnibus Objections that include objections to Claims on any basis provided for in Bankruptcy Rule 3007(d), Local Rule 3007-1, and/or the Additional Grounds.

2. The Reorganized Debtors (or any successors thereto), may object to more than 100 claims in a single Omnibus Objection on any of the bases set forth in Bankruptcy Rule 3007(d) and/or the Additional Grounds.

3. The Reorganized Debtors (or any successors thereto) shall be authorized to file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are hereby approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e) and Local Rule 3007-1.

4. The form of Objection Notice attached hereto as **Exhibit 2** is hereby approved.

5. Nothing in this Order shall affect the Reorganized Debtors' (or any successors thereto) authority to pay claims to the extent authorized by a separate order of the Court.

6. Nothing in this Order shall obligate the Reorganized Debtors (or any successors thereto) to settle or pursue settlement of any particular claim. Settlements of claims may be negotiated and compromised by the Reorganized Debtors in their sole discretion (subject to applicable law).

7. For the avoidance of doubt, the Reorganized Debtors may include objections to Proofs of Claim and scheduled Claims in Omnibus Objections.

8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order, the Motion, or the Objection Procedures shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

10. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2021
Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: SPEEDCAST INTERNATIONAL LIMITED, et al., Reorganized Debtors.¹	§ § Chapter 11 § § § Case No. 20-32243 (MI) § § (Jointly Administered) §
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PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “**Omnibus Objection**”) to claims on the grounds that such claims, in part or in whole:

- ~~(a) such claims are inconsistent with the Reorganized Debtors’ books and records;~~
- (a) ~~(b)~~ fail to specify the asserted claim amount ~~(or only list other claim amount as~~ than “unliquidated”);
- (b) ~~(e)~~ were, in whole or in part paid prepetition or paid post-petition pursuant to an order entered by the Court or are satisfied by payment in full on account of such Claim from a party that is not a Reorganized Debtor;
- (c) ~~(d) seek recovery of amounts for which the Reorganized Debtors are not liable, including but not limited to~~ assert rejection damages claims that exceed the maximum allowable amount of such claims under ~~11 U.S.C. §section~~ 502(b)(6) of the Bankruptcy Code;
- ~~(e) assert a priority in an amount that exceeds the maximum amount under § 507 of the Bankruptcy Code;~~
- (d) ~~(f)~~ are incorrectly or improperly classified under the Bankruptcy Code or the Plan;

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

- (e) ~~(g)~~ have been formally withdrawn by the claimant through the filing of a pleading or through the entry of a Court order indicating withdrawal of the Claim;
- (f) ~~(h)~~ are filed against ~~non-Reorganized-non-~~Debtors ~~or are filed against multiple Reorganized Debtors~~;
- (g) ~~(i)~~ fail to specify a Reorganized Debtor against whom the Claim is asserted;
- (h) ~~(j)~~ are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with the Plan; or
- (i) are unenforceable against a Debtor or Reorganized Debtor or property thereof, under any agreement or applicable law for a reason other than because such claims are contingent or unmatured.
- ~~(k) are disallowed pursuant to §502 of the Bankruptcy Code; or~~
- ~~(l) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor.~~

2. Form of Omnibus Objection. Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. Supporting Documentation. ~~To~~ For all Omnibus Objections under 1(j), above, and otherwise to the extent appropriate, Omnibus Objections shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the claims in accordance with Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. Including an Omnibus Objection on one exhibit will not constitute a waiver of the Reorganized Debtors' right to object to the Claim on an additional basis or bases. The exhibits will include, without

limitation, the following information alphabetized by claimant:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the proof of claim number or schedule number related thereto from the claims register;
- (b) the asserted amount of the claim;
- (c) the grounds for the objection;
- (d) a cross-reference to the section of the Omnibus Objection discussing such claim; and
- (e) other information, as applicable, including: (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify; (ii) the claim amounts of Claims the Reorganized Debtors seek to reduce; or (iii) the surviving claim amount, if any, of claimants affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the “**Objection Notice**”), which will:

- (a) adequately describe the nature of the objection;
- (b) inform creditors that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a “**Response**”); to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information;
- (e) include an exhibit listing the names of all creditors that are subject to the Omnibus Objection, along with reference to the particular exhibits of the Omnibus Objection on which their Claims are listed; and
- (f) describe how copies of proofs of claim, the Omnibus Objection, and other pleadings filed in the chapter 11 cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court’s electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be mailed to each claimholder that is subject to

such objection.

7. Omnibus Claims Objection Hearings. Each Omnibus Objection may be set for a hearing no less than 30 days after service of the Omnibus Objection (each, a “**Hearing**”), unless the Court orders otherwise. In the applicable Reorganized Debtor's discretion, each Omnibus Objection may be filed either (i) with a Hearing date already scheduled in coordination with the Court; or (ii) filed without a Hearing date with the intent of scheduling a Hearing date in the event one or more Responses is filed. Hearings will be conducted according to Local Rule 3007-1(d) such that, unless otherwise ordered by the Court or by consent of the parties, the initial Hearing will be non-evidentiary and used as a scheduling conference. ~~In the applicable Reorganized Debtor's sole discretion, after notice to the affected claimant~~ Adjournments or continuances of claim objections hearings must either (i) be agreed and reflected in a claims objection hearing agenda that is filed at least 24 hours prior to the scheduled hearing; or (ii) ordered by the Court on motion of any party. If a subsequent Hearing is necessary, the Reorganized Debtor ~~may (without further order of the Court) adjourn a Hearing on an Omnibus Objection to a subsequent hearing date by filing a notice or statement on the docket.~~ shall file with the Court and serve on the affected claimant(s) a notice of the subsequent Hearing (the date of which shall be determined in consultation with the affected claimant(s) or announced on the record).

8. Entry of an Order Without a Hearing. For Claims subject to an Omnibus Objection for which no Response is filed and no appearance is made at a scheduled Hearing (if any), or a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the scheduled Hearing (if any), the applicable Reorganized Debtor may request at the scheduled Hearing, if any, that the Court enter an order granting the Omnibus

Objection with respect to such claim. Furthermore, if no Hearing has been scheduled, the Reorganized Debtor may seek entry of an order granting the Omnibus Objection without further notice to the claimant or a Hearing with respect to any claim for which a Response was not filed in accordance with these procedures or for which a Response was consensually resolved with the claimant. ~~Contested Claims for which a Response is filed but not resolved before the Hearing may be heard at the Hearing or adjourned to a subsequent hearing date in the Reorganized Debtor's sole discretion . If a subsequent Hearing is necessary, the Reorganized Debtor shall file with the Court and serve on the affected claimant(s) a notice of the subsequent Hearing (the date of which shall be determined in consultation with the affected claimant(s) or announced on the record).~~ Notwithstanding the foregoing, nothing in these procedures shall prejudice the Reorganized Debtors' right to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein pursuant to Section "Q" the Complex Case Rules.

9. Contested Matter. Each claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court, the Plan, and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the amount and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

Responses to Omnibus Objections

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the procedures set forth herein and to

appear at the Hearing. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing, the Court may grant the objection with respect to such claim without further notice to the claimant.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Reorganized Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim, ~~including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;~~
- ~~(c) a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the objection; provided that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; and, provided, further, that the claimant shall disclose to counsel for the Reorganized Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints;~~
- ~~(d) a declaration or other statement of a person with personal knowledge of the relevant facts that support the Response; and~~
- (c) ~~(e)~~ the following contact information for the responding party:
 - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court not later than the day that is thirty (30) calendar days from the date the Omnibus Objection is served.

13. Discovery. If either the Reorganized Debtors or the claimant determines that discovery is necessary in advance of a Hearing on an Omnibus Objection, ~~the Reorganized Debtor~~such party will serve a notice on the ~~affected claimant~~other party and its counsel of record (if any) that a scheduling order with respect to the Omnibus Objection will be requested at the Hearing. Such notice may be incorporated into the agenda for the Hearing, or may be provided by separate notice.

14. Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the Hearing, if one is scheduled, may result in the Court granting the Omnibus Objection without further notice or Hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

15. Reply to a Response. The Reorganized Debtors shall be permitted to file a reply to any Response no later than two (2) business days before the Hearing with respect to the relevant Omnibus Objection.

Miscellaneous

16. Additional Information. Copies of these procedures, the Motion, the Proposed Order or any other pleadings filed in these chapter 11 cases are available at no cost at <http://www.kccllc.net/speedcast>

Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized

Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.

Exhibit 2

Objection Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i>,	§	
	§	Case No. 20-32243 (MI)
	§	
Reorganized Debtors.¹	§	(Jointly Administered)
	§	

**NOTICE OF THE REORGANIZED DEBTORS' [NUMBER] OMNIBUS CLAIMS
OBJECTION**

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW OR MODIFY THE CLAIM THAT YOU FILED IN THESE BANKRUPTCY CASES. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT A HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

[A HEARING HAS BEEN SET ON THIS OBJECTION ON [DATE] AT [TIME] IN COURTROOM 404, 515 RUSK, HOUSTON, TEXAS 77002. YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AUDIO/VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE THROUGH THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE ISGUR'S CONFERENCE ROOM NUMBER IS 954554.]

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://www.kccllc.net/speedcast>. The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING. APPLICATION. TO CONNECT, YOU SHOULD ENTER THE MEETING CODE “JUDGEISGUR” IN THE GOTOMEETING APP OR CLICK THE LINK ON JUDGE ISGUR’S HOME PAGE ON THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING. HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF THE HEARING. TO MAKE YOUR ELECTRONIC APPEARANCE, GO TO THE SOUTHERN DISTRICT OF TEXAS WEBSITE AND SELECT “BANKRUPTCY COURT” FROM THE TOP MENU. SELECT “JUDGES’ PROCEDURES,” THEN “VIEW HOME PAGE” FOR JUDGE ISGUR. UNDER “ELECTRONIC APPEARANCE” SELECT “CLICK HERE TO SUBMIT ELECTRONIC APPEARANCE”. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK “SUBMIT” TO COMPLETE YOUR APPEARANCE.]²

THIS OBJECTION SEEKS TO DISALLOW ~~AND EXPUNGE~~ OR MODIFY CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT [] THROUGH EXHIBIT [] TO THE ORDER FILED WITH THIS OBJECTION.

Important Information Regarding the Objection

Grounds for the Objection. By the Objection, the Reorganized Debtors are seeking to [disallow/~~expunge~~/reclassify/reduce/subordinate] your claim(s) listed in the schedule attached hereto on the grounds that your claim(s) [is/are] []. The claim(s) subject to the [] Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Objection Procedures. On [Date], the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) entered an order [ECF No.] approving procedures for

² Information regarding appearance at a hearing will only be included to the extent the applicable omnibus objection filed with a hearing date is already scheduled.

filing and resolving objections to Claims asserted against the Reorganized Debtors in these chapter 11 cases (the “**Objection Procedures**”). A copy of the Objection Procedures is included with this notice. Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.

Resolving the Objection

Parties Required to File a Response. If you disagree with the Omnibus Objection filed with respect to your claim, you must file a response (each, a “**Response**”) with the Court by 4:00 p.m. (prevailing Central Time) on [] 2021. Please review the Objection Procedures to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Reorganized Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim, ~~including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;~~
- ~~(c) a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the objection; provided that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; and, provided, further, that the claimant shall disclose to counsel for the Reorganized Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints;~~
- ~~(d) a declaration or other statement of a person with personal knowledge of the~~

~~relevant facts that support the Response; and~~

(c) ~~(e)~~ the following contact information for the responding party:

(iii) ~~(i)~~ the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(iv) ~~(ii)~~ the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

Failure to Respond. **Failure to timely file a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.**

Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing.³ If a Response is timely filed, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. Failure to appear at the initial hearing may result in the summary disposition of the objection.

[OR]

A hearing (the "**Hearing**") on the Omnibus Objection will be held on [Date], at [Time] prevailing Central Time, before the Honorable Marvin Isgur, United States Bankruptcy Judge, in Courtroom 404, 515 Rusk, Houston, Texas 77002. You may participate in the Hearing via audio/video connection with the instructions included at the top of this Notice. ~~The Hearing may be adjourned to a later date in the Reorganized Debtor's sole discretion~~ Adjournments or

³ This section will be altered to reflect whether a Hearing has been scheduled in advance of the filing of the applicable Omnibus Objection

continuances of claim objections hearings must either (i) be agreed and reflected in a claims objection hearing agenda that is filed at least 24 hours prior to the scheduled hearing; or (ii) ordered by the Court on motion of any party. Unless you have resolved your claim with the Reorganized Debtor, you must attend the Hearing if you disagree with the Omnibus Objection and have filed a Response.

Discovery. If either the Reorganized Debtors or the claimant determines that discovery is necessary in advance of a Hearing on an Omnibus Objection, ~~the Reorganized Debtors may~~such party will serve a notice on the ~~claimant~~other party and its counsel of record. ~~Failure to comply with this paragraph will not preclude a party from later seeking discovery.~~ (if any) that a scheduling order with respect to the Omnibus Objection will be requested at the Hearing. Such notice may be incorporated into the agenda for the Hearing, or may be provided by separate notice.

Additional Information

Questions or Information. Copies of these procedures, the Motion, the Proposed Order or any other pleadings filed in these chapter 11 cases are available at no cost at <http://www.kccllc.net/speedcast>. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.tx.uscourts.gov/bankruptcy>. Please do not contact the Court to discuss the merits of any Claim or any Omnibus Objection filed with respect thereto.

Reservation of Rights

Nothing in any Omnibus Objection or Objection Notice shall be deemed:
(a) an admission as to the amount of, basis for, or validity of any claim against the

Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim against, or interest in, the Reorganized Debtors, their property or estates; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (d) prejudicial to the rights of the Reorganized Debtors to assert or bring individualized objections to claims on any basis.

Dated: [], 2021
Houston, Texas

Respectfully submitted,

/s/ DRAFT

WEIL, GOTSHAL & MANGES LLP

Alfredo R. Pérez (15776275)

Brenda L. Funk (24012664)

Stephanie N. Morrison (admitted *pro hac vice*)

700 Louisiana Street, Suite 1700

Houston, Texas 77002

Telephone: (713) 546-5000

Facsimile: (713) 224-9511

Email: Alfredo.Perez@weil.com

Brenda.Funk@weil.com

Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP

Gary T. Holtzer (admitted *pro hac vice*)

David N. Griffiths (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Email: Gary.Holtzer@weil.com

David.Griffiths@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP

Paul R. Genender (00790758)

Amanda Pennington Prugh (24083646)

Jake R. Rutherford (24102439)

200 Crescent Court, Suite 300

Dallas, Texas 75201

Telephone: (214) 746-7877

Facsimile: (214) 746-7777

Email: Paul.Genender@weil.com

Amanda.PenningtonPrugh@weil.com

Jake.Rutherford@weil.com

Attorneys for the Reorganized Debtors