



*Waypoint Leasing Holdings Ltd. and its Affiliated Debtors*, dated July 22, 2019, filed his *Motion Pursuant to Bankruptcy Rule 9019 For An Order Approving Settlement of Adversary Proceeding* [Adv. Pro. Doc. No. 42] (the “Motion”), with Certificate of Service filed on May 19, 2021 [Adv. Pro. Doc. No. 43].

2. Objections, if any, to the Motion were required to have been filed with the Court and served no later than 4:00 p.m. (EDT) on June 1, 2021 (the “Objection Deadline”).

3. The Objection Deadline has passed and no objections to the Motion appear on the docket or were served upon the undersigned counsel.

4. In accordance with Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed at least forty-eight (48) hours after the Objection Deadline.

5. Due to the foregoing, it is respectfully requested that the Court enter the proposed form of order that was attached to the Motion, a copy of which is attached hereto as **Exhibit A**.

Dated: New York, New York  
June 3, 2021

COLE SCHOTZ P.C.

/s/ Steven L. Klepper

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**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

WAYPOINT LEASING HOLDINGS LTD., *et al.*,

Debtors.

**WILLIAM TRANSIER**, as Plan Administrator  
for Waypoint Leasing Holdings Ltd. and its  
Affiliated Debtors,

Plaintiff,

– against –

SUNTRUST BANK, MUFG UNION BANK,  
N.A., DEUTSCHE BANK AG, NEW YORK  
BRANCH, BARCLAYS BANK PLC, and  
GOLDMAN SACHS BANK USA.

Defendants.

## Chapter 11

Case No. 18-13648 (DSJ)

(Jointly Administered)

Adv. Pro. No. 19-01448 (DSJ)

**ORDER GRANTING PLAN ADMINISTRATOR'S  
MOTION PURSUANT TO BANKRUPTCY RULE 9019 FOR  
AN ORDER APPROVING SETTLEMENT OF ADVERSARY PROCEEDING**

Upon the motion (the “Motion”)<sup>1</sup> of William Transier (“Plan Administrator”), as Plan Administrator for the Debtors<sup>2</sup> under the *Third Amended Chapter 11 Plan of Liquidation of Waypoint Leasing Holdings Ltd. and its Affiliated Debtors*, dated July 22, 2019 (the “Plan”), for an order approving the Settlement Agreement attached to the Motion as Exhibit B pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and upon the Declaration of William Transier; and due and sufficient notice of the Motion having been given

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings assigned to them in the Motion.

<sup>2</sup> A complete list of the Debtors in this Chapter 11 case is attached to the Third Amended Chapter 11 Plan of Liquidation of Waypoint Leasing Holdings Ltd. and its Affiliated Debtors [Docket No. 871] as Exhibit A.

under the particular circumstances; and it appearing that no other or further notice need be provided; and it appearing that the relief requested by the Motion is in the best interests of the Debtors, their estates, their creditors, their stakeholders, and other parties in interest; and after due deliberation thereon, and sufficient cause appearing therefor, it is hereby:

**ORDERED, ADJUDGED AND DECREED that:**

1. The Motion is GRANTED to the extent set forth herein.
2. The Settlement Agreement is hereby approved pursuant to Bankruptcy Rule 9019.
3. Any settlement or compromise by Plan Administrator contained within the Settlement Agreement is approved under Bankruptcy Rule 9019.
4. Plan Administrator is authorized and empowered to take all actions necessary to implement the relief granted in this Order.
5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

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HONORABLE DAVID R. JONES