

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

In re:	)	Chapter 11
WINDSTREAM HOLDINGS, INC., <i>et al.</i> ,	)	Case No. 19-22312 (RDD)
Debtors.	)	(Jointly Administered)
WINDSTREAM HOLDINGS, INC. and	)	
WINDSTREAM SERVICES, LLC,	)	
Plaintiffs,	)	Adversary Proceeding
v.	)	Case No. 19-08279 (RDD)
UNITI GROUP, INC., <i>et al.</i>	)	
Defendants.	)	

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE  
 MOTION IN LIMINE OF UMB BANK, NATIONAL ASSOCIATION AND U.S. BANK  
 NATIONAL ASSOCIATION, AS INDENTURE TRUSTEES, TO PRECLUDE CERTAIN  
 TESTIMONY OF PAUL H. CHILL AND WILLIAM P. ZARAKAS**

The Official Committee of Unsecured Creditors (the “Committee”) of Windstream Holdings, Inc. and its debtor affiliates, as debtors and debtors in possession, by and through its undersigned counsel, as Intervenors in the above-captioned adversary proceeding, hereby joins the motion *in limine* (the “Motion”) to preclude certain testimony of Paul H. Chill and William P. Zarakas, filed on February 26, 2020, by UMB Bank, National Association and U.S. Bank National Association. (ECF No. 112.)

**JOINDER**

The Committee joins in, and hereby incorporates by reference, the points, authorities, and arguments advanced in the Motion.



192231220022700000000001

**RESERVATION OF RIGHTS**

The Committee reserves the right to supplement this Joinder, as well as to respond to any further briefs filed in support of, or in opposition to, the Motion, and to raise additional arguments or objections, including during a hearing before the Court.

**CONCLUSION**

WHEREFORE, for the reasons set forth in the Motion, the Committee respectfully requests that the Court grant the Motion and preclude certain testimony of Paul H. Chill and William P. Zarakas.

Dated: February 27, 2020  
New York, New York

/s/ Lorenzo Marinuzzi  
MORRISON & FOERSTER LLP  
Lorenzo Marinuzzi  
Todd M. Goren  
Jennifer L. Marines  
Steven T. Rappoport  
Jocelyn E. Greer  
250 W 55th St.  
New York, NY 10019  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900

*Counsel for the Official Committee of Unsecured Creditors*