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*Counsel to CQS (US), LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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U.S. BANK NATIONAL ASSOCIATION,	:
CQS (US), LLC,	:
	:
Appellants,	:
	:
- against -	:
	:
WINDSTREAM HOLDINGS, INC., <i>et al.</i> ,	:
	:
Appellees.	:
-----X	
In re:	:
	:
WINDSTREAM HOLDINGS, INC., <i>et al.</i> ,	:
	:
Debtors.	:
	:
-----X	

Case No. 20-cv-4276 (VB)  
(Lead Case)

Chapter 11  
Case No. 19-22312 (RDD)  
(Jointly Administered)

**APPELLANT CQS (US) LLC'S JOINDER TO THE REPLY  
FILED BY U.S. BANK NATIONAL ASSOCIATION [20 CV 4276 DOC. #53]**

CQS (US), LLC, on behalf of various funds it manages, by and through it undersigned counsel, hereby joins in and relies on the Reply [20 CV 4276 Doc. #53]



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(the “**Reply**”)<sup>1</sup> filed by U.S. Bank National Association (“**U.S. Bank**”) on September 15, 2020 (a) in further support of the *Motion for (I) a Determination of Post-Effective Date Jurisdiction or (II) in the Alternative, a Stay Pending Appeal* [20 CV 4276 Doc. #44] (the “**Motion**”) filed by U.S. Bank and (b) in response to the opposition to the Motion filed by the Debtors [20 CV 4276 Doc. #51] and Elliot Investment Management L.P. [20 CV 4276 Doc. #52].

For the reasons set forth in the Reply and in the Motion, the Court should (i) determine that these appeals will not be rendered equitably moot by the substantial consummation of the Plan because it can fashion an adequate remedy if Appellants are successful, or (ii) grant a stay for such time it needs to adjudicate the appeals.

Dated: New York, New York  
September 15, 2020

**SULLIVAN & WORCESTER LLP**

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