

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

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

**MOTION FOR CONTINUANCE OF HEARING  
SCHEDULED FOR JUNE 8, 2020 AT 1:30 PM (CENTRAL TIME)**

SpeedCast International Limited and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), respectfully represent as follows in support of this motion:

**Background**

1. On April 23, 2020 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (the “**Bankruptcy Code**”). The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. The Debtors’ chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”).

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



3. The Debtors, combined with their non-debtor affiliates (collectively, “**Speedcast**” or the “**Company**”), are the largest provider of remote and offshore satellite communications and information technology services in the world. Speedcast’s fully-managed service is delivered to more than 2,000 customers in 140 countries via a leading global, multi-access technology, multi-band and multi-orbit network of 80+ satellites and an interconnecting global terrestrial network, bolstered by on-the-ground local support from 40+ countries. Speedcast services customers in sectors such as Commercial Maritime, Cruise, Energy, Mining, Government, NGOs, Enterprise, and Media.<sup>2</sup>

4. On May 6, 2020, the United States Trustee for Region 7 (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (as reconstituted on May 12, 2020, the “**Creditors’ Committee**”). No trustee or examiner has been appointed in these chapter 11 cases.

#### **Jurisdiction**

5. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

#### **Relief Requested**

6. For the reasons set forth below, the Debtors request a continuance of the hearing, currently scheduled to begin June 8, 2020 at 1:30 p.m. (prevailing Central Time) (the “**Final Hearing**”), to consider approval of the Debtors’ *Emergency Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving*

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<sup>2</sup> None of the Speedcast entities associated with the Company’s Government business are Debtors in these chapter 11 cases.

*Restrictions on Certain Transfers of Interests in, and Claims Against, the Debtors and Claims of Certain Worthless Stock Deductions* (Docket No. 17) (the “**NOL Motion**”) on a final basis, to **June 16, 2020 at 1:30 p.m. (prevailing Central Time)**.

7. A proposed form of order granting the relief requested is attached hereto as **Exhibit A** (the “**Proposed Order**”).

**Request for Continuance**

8. On the Petition Date, the Debtors filed the NOL Motion.

9. On April 27, 2020, Portsea Asset Management LLP (“**Portsea**”) filed the *Limited Objection of Portsea Asset Management LLP to Emergency Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in, and Claims Against, the Debtors and Claims of Certain Worthless Stock Deductions* (Docket No. 125) (the “**Limited Objection**”).

10. On April 28, 2020, the Court entered the *Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests In, and Claims Against, the Debtors and Claims of Certain Worthless Stock Deductions granting the relief requested in the NOL Motion*, granting the relief requested in the NOL Motion on an interim basis (Docket No. 133).

11. The Final Hearing is currently scheduled to begin on June 8, 2020 at 1:30 p.m. (prevailing Central Time). The Debtors and Portsea continue negotiating towards a consensual resolution of the Limited Objection.

12. The Debtors request the continuance of the Final Hearing to June 16, 2020 at 1:30 p.m. (prevailing Central Time) to allow the parties additional time to continue negotiations.

13. The Debtors have notified counsel to Portsea of the request to continue the Final Hearing and they do not object to such continuance.

**Notice**

14. Notice of this Motion will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Local Rule 9013-1(d).

*[Remainder of page intentionally left blank.]*

Dated: June 5, 2020  
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**Certificate of Service**

I hereby certify that on June 5, 2020, 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**

<b>In re:</b>	§	<b>Chapter 11</b>
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<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	<b>Re: Docket No. ____</b>

**ORDER GRANTING MOTION FOR CONTINUANCE**

Upon the *Motion for Continuance of Hearing Scheduled for June 8, 2020 at 1:30 PM (Central Time)*, dated June 5, 2020 (the “**Motion**”), of SpeedCast International Limited and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), it is hereby ordered that the hearing currently scheduled for June 8, 2020 to consider final relief on the *Emergency Motion of Debtors for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in, and Claims Against, the Debtors and Claims of Certain Worthless Stock Deductions* (Docket No. 17) is continued to **June 16, 2020 at 1:30 p.m. (prevailing Central Time)**, or as soon thereafter as counsel may be heard.

Dated: \_\_\_\_\_, 2020  
Houston, Texas

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MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

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