

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: TK HOLDINGS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 17-11375 (BLS) Jointly Administered
In re: TAKATA CORPORATION, <i>et al.</i> , ² Debtors.	Chapter 15 Case No. 17-11713 (BLS) Jointly Administered

**AMENDED³ NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
NOVEMBER 29, 2018 AT 10:00 A.M. (PREVAILING EASTERN TIME)⁴**

**Hearing Location: 824 N. Market St., 6th Floor, Courtroom #1,
Wilmington, DE 19801**

Before the Honorable Brendan L. Shannon

ADJOURNED/RESOLVED MATTERS:

1. Motion by Canadian Antitrust Class Action Claimants Against TK Holdings, Inc. Pursuant to Fed. Bankr. P. 9014 and 7023 to Make Federal Rule of Civil Procedure Applicable to These Proceedings, to Permit the Filing of a Class Proof of Claim and Appointing Class Counsel [Filed 6/4/18] (Docket No. 2933)

Response Deadline: June 19, 2018 at 4:00 p.m. (ET). Extended to July 17, 2018 at 4:00 p.m. (ET) for the Legacy Trustee.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Takata Americas (9766); TK Finance, LLC (2753); TK China, LLC (1312); TK Holdings Inc. (3416); Takata Protection Systems Inc. (3881); Interiors in Flight Inc. (4046); TK Mexico Inc. (8331); TK Mexico LLC (9029); TK Holdings de Mexico, S. de R.L. de C.V. (N/A); Industrias Irvin de Mexico, S.A. de C.V. (N/A); Takata de Mexico, S.A. de C.V. (N/A); and Strosshe-Mex, S. de R.L. de C.V. (N/A). Except as otherwise set forth herein, the Debtors' international affiliates and subsidiaries are not debtors in these chapter 11 cases. The location of the Debtors' corporate headquarters is 2500 Takata Drive, Auburn Hills, Michigan 48326.

² The chapter 15 Debtors are: TKJP Corporation (formerly Takata Corporation), Takata Kyushu Corporation, and Takata Service Corporation.

³ **Amended items noted in bold.**

⁴ Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946), no later than 12:00 p.m. one business day prior to the hearing.

Responses Received:

- A. Objection to Motion by Canadian Antitrust Class Action Claimants Against TK Holdings, Inc. Pursuant to Fed. Bankr. P. 9014 and 7023 to Make Federal Rule of Civil Procedure Applicable to These Proceedings, to Permit the Filing of a Class Proof of Claim and Appointing Class Counsel Filed by the Reorganized TK Holdings Trust [Filed 7/17/18] (Docket No. 3076)

Related Documents:

- A. [Signed] Order Approving Stipulation By and Between the Reorganized TK Holdings Trust and Canadian Claimants to Adjourn Hearing on Class Claim Motion [Filed 7/9/18] (Docket No. 3054)

Status: This matter is adjourned to the hearing scheduled for December 19, 2018 at 10:00 a.m. (ET).

2. Oracle America, Inc.'s Request for Allowance and Payment of Administrative Expenses [Filed 6/11/18] (Docket No. 2953)

Response Deadline: July 17, 2018 at 4:00 p.m. (ET). Extended to December 12, 2018 for the Legacy Trustee.

Responses Received: None at this time.

Related Documents: None at this time.

Status: This matter is adjourned to the hearing scheduled for December 19, 2018 at 10:00 a.m. (ET).

3. The Reorganized TK Holdings Trust's Ninth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 9/25/18] (Docket No. 3360)

Response Deadline: October 9, 2018 at 4:00 p.m. (ET). Extended to November 2, 2018 at 4:00 p.m. for the Group 1 Dealerships.

Responses Received: None.

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with The Reorganized TK Holdings Trust's Ninth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 10/12/18] (Docket No. 3396)

Status: The claims listed on Exhibits B and C to the omnibus objection have been withdrawn to by the affected claimants. The claims listed on Exhibit A to the omnibus objection have been amended. Pursuant to agreement with claimants' counsel, the claims listed on Exhibit A are expunged rendering the objection moot.

4. The Reorganized TK Holdings Trust's Objection to Claim of Emerald Capital Advisors Corp., as Liquidating Trustee for the FAH Liquidating Trust (Proof of Claim No. 3134) [Filed 10/5/18] (Docket No. 3379)

Response Deadline: October 19, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding The Reorganized TK Holdings Trust's Objection to Claim of Emerald Capital Advisors Corp., as Liquidating Trustee for the FAH Liquidating Trust (Proof of Claim No. 3134) [Filed 11/1/18] (Docket No. 3423)
- B. [Signed] Order Sustaining the Reorganized TK Holdings Trust's Objection to Claim of Emerald Capital Advisors Corp., as Liquidating Trustee for the FAH Liquidating Trust [Filed 11/2/18] (Docket No. 3424)

Status: The order has been entered on this matter and it is now resolved.

5. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, to Claim No. 2129 of Western Surety Company [Filed 8/8/18] (Docket No. 3197)

Response Deadline: August 29, 2018 at 4:00 p.m. (ET).

Responses Received:

- A. Claimant's Response to Debtors' Objection to Proof of Claim No. 2129 Filed by Western Surety [Filed 8/29/18] (Docket No. 3324)

Related Documents: None.

Status: This matter is adjourned to the hearing scheduled for December 19, 2018 at 10:00 a.m. (ET).

6. Objection to Claim by Claimants Robert and Mary Fisher [Filed 10/8/18] (Docket No. 3382)

Response Deadline: October 23, 2018 at 4:00 p.m. (ET). Extended for the Claimants to December 6, 2018.

Responses Received: None at this time.

Related Documents: None.

Status: This matter is adjourned to the hearing scheduled for December 19, 2018 at 10:00 a.m. (ET).

7. Objection of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, to Claim Nos. 2421, 2382, 2405, 2408, 2411, 2501, 2502 and 2505 of National Union Fire Insurance Co. of Pittsburgh, PA, Filed on Its on Behalf and On Behalf of Related Entities [Filed 10/8/18] (Docket No. 3386)

Response Deadline: October 23, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Objection of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, to Claim Nos. 2421, 2382, 2405, 2408, 2411, 2501, 2502 and 2505 of National Union Fire Insurance Co. of Pittsburgh, PA, Filed on Its on Behalf and On Behalf of Related Entities [Filed 11/14/18] (Docket No. 3447)
- B. [Signed] Order Granting Objection of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust to Claims Nos. 2421, 2382, 2405, 2405, 2408, 2411, 2501, 2502 & 2505 of National Union Fire Insurance Co. of Pittsburgh, PA, Filed on its Behalf and on Behalf of Related Entities [Filed 11/16/18] (Docket No. 3454)

Status: The order has been entered on this matter and it is now resolved.

8. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Claim of Michigan Department of Treasury [Filed 10/8/18] (Docket No. 3388)

Response Deadline: October 23, 2018 at 4:00 p.m. (ET). Extended for the Claimants to November 9, 2018 at 4:00 p.m. (ET).

Responses Received:

- A. Michigan Department of Treasury's Response to Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Claim of Michigan Department of Treasury [Filed 11/5/18] (Docket No. 3434)

Related Documents: None.

Status: This matter is adjourned to the hearing scheduled for December 19, 2018 at 10:00 a.m. (ET).

9. The Reorganized TK Holdings Trust's Fourteenth Omnibus Objection to Claims - Non-Substantive (Late Filed PPIC Claims) [Filed 10/25/18] (Docket No. 3415)

Response Deadline: November 15, 2018 at 4:00 p.m. (ET).

Responses Received:

- A. Response of Desiree Gunder to The Reorganized TK Holdings Trust's Fourteenth Omnibus Objection to Claims - Non-Substantive (Late Filed PPIC Claims) [Filed 11/16/18] (Docket No. 3455)

Related Documents:

- A. Certification of Counsel Regarding The Reorganized TK Holdings Trust's Fourteenth Omnibus Objection to Claims - Non-Substantive (Late Filed PPIC Claims) [Filed 11/20/18] (Docket No. 3459)
- B. [Signed] Order Sustaining The Reorganized TK Holdings Trust's Fourteenth Omnibus Objection to Claims - Non-Substantive (Late Filed PPIC Claims) [Filed 11/21/18] (Docket No. 3464)

Status: The order has been entered on this matter and it is now resolved.

- 10. The Reorganized TK Holdings Trust's Fifteenth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 10/25/18] (Docket No. 3416)

Response Deadline: November 15, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with The Reorganized TK Holdings Trust's Fifteenth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 11/15/18] (Docket No. 3451)
- B. Certification of No Objection to The Reorganized TK Holdings Trust's Fifteenth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 11/20/18] (Docket No. 3458)
- C. [Signed] Order Sustaining The Reorganized TK Holdings Trust's Fifteenth Omnibus Objection to Claims - Non-Substantive (Insufficient Information PPIC Claims) [Filed 11/21/18] (Docket No. 3465)

Status: The order has been entered on this matter and it is now resolved.

- 11. Second Motion of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, Pursuant to, Inter Alia, Fed. R. Bankr. P. 9006(b)(1), for an Order Extending the Deadline to Object to Certain Claims [Filed 11/6/18] (Docket No. 3437)

Response Deadline: November 20, 2018 at 4:00 p.m. (ET).

Responses Received: None

Related Documents:

- A. Certification of No Objection to Second Motion of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, Pursuant to, Inter Alia, Fed. R. Bankr. P. 9006(b)(1), for an Order Extending the Deadline to Object to Certain Claims [Filed 11/21/18] (Docket No. 3466)
- B. [Signed] Second Order Granting Motion of Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust, Pursuant to, Inter Alia, Fed. R. Bankr. P. 9006(b)(1), for an Order Extending the Deadline to Object to Certain Claims [Filed 11/26/18] (Docket No. 3478)

Status: The order has been entered on this matter and it is now resolved.

12. Second Motion of Eric D. Green, in his capacity as Trustee of the Takata Airbag Tort Compensation Trust Fund, for an Order Extending the Deadline to Object to Other PI/WD Claims Filed by Eric D. Green, in his capacity as trustee of the PSAN PI/WD Trust d/b/a the Takata Airbag Tort Compensation Trust Fund [Filed 11/8/18] (Docket No. 3441)

Response Deadline: November 20, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Second Motion of Eric D. Green, in his capacity as Trustee of the Takata Airbag Tort Compensation Trust Fund, for an Order Extending the Deadline to Object to Other PI/WD Claims Filed by Eric D. Green, in his capacity as trustee of the PSAN PI/WD Trust d/b/a the Takata Airbag Tort Compensation Trust Fund [Filed 11/21/18] (Docket No. 3467]
- B. [Signed] Order Granting Second Motion of Eric D. Green, in his capacity as Trustee of the Takata Airbag Tort Compensation Trust Fund, for an Order Extending the Deadline to Object to Other PI/WD Claims Filed by Eric D. Green, in his capacity as trustee of the PSAN PI/WD Trust d/b/a the Takata Airbag Tort Compensation Trust Fund [Filed 11/26/18] (Docket No. 3479)

Status: The order has been entered on this matter and it is now resolved.

UNCONTESTED MATTER:

13. The Reorganized TK Holdings Trust's Thirteenth Omnibus Objection to Claims - Substantive (No Liability Claims and Reduce & Allow Claims) [Filed 10/8/18] (Docket No. 3384)

Response Deadline: October 23, 2018 at 4:00 p.m. (ET).

Responses Received: Informal responses of International Development Corporation, WilmerHale, and Highland Industries, Inc.

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with The Reorganized TK Holdings Trust's Thirteenth Omnibus Objection to Claims - Substantive (No Liability Claims and Reduce & Allow Claims) [Filed 11/15/18] (Docket No. 3450)
- B. Certification of Counsel Regarding The Reorganized TK Holdings Trust's Thirteenth Omnibus Objection to Claims - Substantive (No Liability Claims and Reduce & Allow Claims) [Filed 11/28/18] (Docket No. 3491)**

Status: This matter is being adjourned with respect to the claims of the International Development Corporation and WilmerHale to December 19, 2018. **The Legacy Trustee has submitted a revised form of order under certification of counsel and respectfully requests entry of the order at the Court's convenience. No hearing is necessary unless the Court has questions.**

MATTERS GOING FORWARD:

14. The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/3/18] (Docket No. 3376)

Response Deadline: October 17, 2018 at 4:00 p.m. (ET).

Responses Received:

- A. Response of Thomas and Deborah Gracen to The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/11/18] (Docket No. 3395)
- B. Response of Patrice A. Maenza to The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/16/18] (Docket No. 3403)

- C. Response of Malissa Perez The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/16/18] (Docket No. 3404)
- D. Response of Greta Wold The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/17/18] (Docket No. 3407)
- E. Response of Benjamin Perez The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/17/18] (Docket No. 3408)
- F. Response of Michelle N. Prindle The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/17/18] (Docket No. 3409)
- G. Response of John L. Prioletti The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/17/18] (Docket No. 3410)
- H. Response of Tamula Chamberlain The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/30/18] (Docket No. 3418)
- I. Response of Brenda M. Griffin The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 10/30/18] (Docket No. 3419)

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with The Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims - Non-Substantive (Amended & Superseded Claims, Duplicate Claims, and Insufficient Documentation Claims) [Filed 11/15/18] (Docket No. 3449)

Reply:

- A. Reply in Support of the Reorganized TK Holdings Trust's Twelfth Omnibus Objection to Claims (Non-Substantive) [Filed 11/26/18] (Docket No. 3468)

Status: This matter is going forward.

15. Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/6/18] (Case No. 17-11375, Docket No. 3480, Case No. 17-11713, Docket No. 162)

Response Deadline: November 21, 2018 at 4:00 p.m. (ET).

Responses Received:

- A. Objection of Anita K. Nesbitt to the Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/15/18] (Case No. 17-11375, Docket No. 3452, Case No. 17-11713, Docket No. 163)
- B. Objection of Greta Wold to Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/19/18] (Case No. 17-11375, Docket No. 3460, Case No. 17-11713, Docket No. 164)
- C. Response of Darcy Phelan-Morrell to Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/20/18] (Case No. 17-11375, Docket No. 3463)
- D. Supplemental Objection of Anita K. Nesbitt to Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/26/18] (Case No. 17-11375, Docket No. 3469, Case No. 17-11713, Docket No. 165)
- E. Response of Mary Ann Gonzales-Lespinasse to Joint Motion of TKJP Corporation and TK Holdings, Inc. for Order Approving (I) Confidentiality and Data Privacy Agreement, and Stipulated Protective Order and (II) Form and Manner of Notice Thereof [Filed 11/26/18] (Case No. 17-11375, Docket No. 3469, Case No. 17-11713, Docket No. 166)

Related Documents: None.

Status: This matter is going forward. At or prior to the hearing, the Movants intend to submit a revised order that includes a revised Schedule D to the Stipulated Protective Order that modifies the “Privilege Search Terms” used in Protocol Step Three under the Stipulated Protective Order to narrow the types of documents that may be deemed “privileged.”

Dated: November 28, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Laura Davis Jones (Bar No. 2436)

David M. Bertenthal (CA Bar No. 167624)

Peter J. Keane (Bar No. 5503)

919 N. Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

E-mail: ljones@pszjlaw.com

dbertenthal@pszjlaw.com

pkeane@pszjlaw.com

*Attorneys for the Trustee of the Reorganized TK
Holdings Trust*