

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

In re:

TK HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 17-11375 (BLS)

Jointly Administered

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
JANUARY 23, 2019 AT 10:00 A.M. (PREVAILING EASTERN TIME)**²
**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.

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)

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 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.

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 next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET). A motion to approve a settlement that resolves this matter has been filed at Docket No. 3542 and is scheduled for the February 21, 2019 omnibus hearing.

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 February 14, 2019 for the Legacy Trustee.

Responses Received: None at this time.

Related Documents: None at this time.

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

3. 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:

- A. [Signed] Order Approving Stipulation Resolving Claim Number 2129 [Filed 1/16/19] (Docket No. 3586)

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

4. 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 next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

5. 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). Extended for International Development Corporation, WilmerHale, and Highland Industries, Inc. to January 14, 2019

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. [Signed] Order Sustaining the Reorganized TK Holding Trust's Thirteenth Omnibus Objection to Claims – Substantive [Filed 11/28/18] (Docket No. 3494)

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET) as to the claims of International Development Corporation and WilmerHale. The Court has entered an order on the remaining claims.

6. 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 next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

7. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Amended Objection to Administrative Expense Claim of Global Tek Co., Ltd. [Filed 11/8/18] (Docket No. 3440)

Response Deadline: November 26, 2018 at 4:00 p.m. (ET). Extended for Claimant to December 14, 2018

Responses Received:

- A. Global Tek Co., Ltd.'s Response to Amended Objection to Administrative Expense Claim [Filed 12/14/18] (Docket No. 3523)

Related Documents: None.

Status: This matter is adjourned to a date to be determined.

8. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claims of ACS Industries, Inc. (Claim Nos. 4983 & 5033) [Filed 12/13/18] (Docket No. 3515)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET). Extended for Claimant to January 30, 2019

Responses Received: None at this time.

Related Documents: None.

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

9. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Anderson Quality Spring Manufacturing, Inc. (Claim No. 5002) [Filed 12/13/18] (Docket No. 3517)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Anderson Quality Spring Manufacturing, Inc. (Claim No. 5002) [Filed 1/8/19] (Docket No. 3545)
- B. [Signed] Order Sustaining Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Anderson

Quality Spring Manufacturing, Inc. (Claim No. 5002) [Filed 1/9/19] (Docket No. 3551)

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

10. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of KnitMesh Technologies Ltd. (Claim No. 4997) [Filed 12/13/18] (Docket No. 3518)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET).

Responses Received: Informal Response from KnitMesh Technologies Ltd.

Related Documents: None.

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

11. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of MJ Celco, Inc. (Claim No. 4988) [Filed 12/13/18] (Docket No. 3519)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET). Extended for Claimant to January 30, 2019

Responses Received: None at this time.

Related Documents: None.

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

12. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Standard Register Latinoamericca S. de R.L. de C.V. (Claim No. 4993) [Filed 12/13/18] (Docket No. 3521)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Standard Register Latinoamericca S. de R.L. de C.V. (Claim No. 4993) [Filed 1/8/19] (Docket No. 3546)

- B. [Signed] Order Sustaining Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Standard Register Latinoamerica S. de R.L. de C.V. (Claim No. 4993) [Filed 1/9/19] (Docket No. 3552)

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

- 13. Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Thomco Specialty Products, Inc. (Claim No. 5006) [Filed 12/13/18] (Docket No. 3522)

Response Deadline: December 27, 2018 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Thomco Specialty Products, Inc. (Claim No. 5006) [Filed 1/8/19] (Docket No. 3547)
- B. [Signed] Order Sustaining Joseph J. Farnan, Jr., as Trustee of the Reorganized TK Holdings Trust's Objection to Administrative Expense Claim of Thomco Specialty Products, Inc. (Claim No. 5006) [Filed 1/9/19] (Docket No. 3553)

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

- 14. The Reorganized TK Holdings Trust's Objection to Claim of Rodney Slobodian (Proof of Claim No. 157) Filed by [Filed 12/20/18] (Docket No. 3527)

Response Deadline: January 3, 2019 at 4:00 p.m. (ET). Extended for Claimant to January 30, 2019

Responses Received: None at this time.

Related Documents: None.

Status: This matter is adjourned to the next omnibus hearing scheduled on February 21, 2019 at 10:00 a.m. (ET).

CONTESTED MATTERS GOING FORWARD:

15. Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability 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 12/21/18] (Docket No. 3528) (the “Third Omnibus Objection”)

Response Deadline: January 16, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Kelli L Cumming [Filed 1/3/19] (Docket No. 3541)
- B. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Beverly S. Hardin [Filed 1/7/19] (Docket No. 3544)
- C. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by James F. DeBouno Jr.[Filed 1/9/19] (Docket No. 3549)
- D. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Jennifer Holst, Gregory Gonzalez and Cormac Bue [Filed 1/11/19] (Docket No. 3566)
- E. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Mark D. Flaherty [Filed 1/11/19] (Docket No. 3567)
- F. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Roberta M. Alvarez [Filed 1/14/19] (Docket No. 3573)
- G. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Pamela Bach [Filed 1/15/19] (Docket No. 3576)

- H. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Helen Howell [Filed 1/16/19] (Docket No. 3580)
- I. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Andrew Kampuries [Filed 1/16/19] (Docket No. 3582)
- J. Opposition/Response by Claimant, Maria G. Gongora (Claim P-0051229) to Trustee's Third Omnibus Objection to No Liability Claims [Filed 1/16/19] (Docket No. 3584)
- K. Response to Trustee's Third Omnibus Objection to Creditor James E. Artel's Claim [Filed 1/16/19] (Docket No. 3585)
- L. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Phyllis DeSalvo, Sandra Hall [Filed 1/16/19] (Docket No. 3587)
- M. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Tom J. Ferrante [Filed 1/17/19] (Docket No. 3590)
- N. Response to Third Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Denise J. Love [Filed 1/17/19] (Docket No. 3591)
- O. Informal response of Joseph Doyle Hoffman (Claim No. 3824)
- P. Informal response of Edwina J. Gonzales (Claim No. P-0053775)

Related Documents:

- A. Declaration of Harold R. Blomquist in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 12/21/18] (Docket No. 3530)
- B. Declaration of David Michael Rains in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 12/21/18] (Docket No. 3531)

- C. Notice of Submission of Proofs of Claim Regarding (i) Third Omnibus Objection of Eric D. Green, In His Capacity as Trustee of The Takata Airbag Tort Compensation Trust Fund, (Substantive) to No Liability Claims; and (ii) Fourth Omnibus Objection of Eric D. Green, In His Capacity as Trustee of The Takata Airbag Tort Compensation Trust Fund, (Substantive) to No Liability Claims [Filed 1/9/19] (Docket No. 3550)
- D. Omnibus Reply in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 1/17/19] (Docket No. 3592)
- E. Supplemental Declaration of Harold R. Blomquist in Support of the Omnibus Reply in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 1/17/19] (Docket No. 3593)

Status: As set forth in the Trustee's reply, the Trustee has agreed to withdraw the Third Omnibus Objection, without prejudice, solely with respect to the claims of Cormac Bue (Claim No. P-0026932), Gregory Gonzalez (Claim No. P-0026825), and Jennifer Holst (Claim No. P-0026820). The Third Omnibus Objection is adjourned to the omnibus hearing scheduled for February 21, 2019 at 10:00 a.m. with respect to the claims of James F. DeBouno Jr. (Claim No. P-0040600), James E. Artel (Claim No. P-0043661), Maria G. Gongora (Claim No. P-0051229), and Edwina J. Gonzales (Claim No. P-0053775). With respect to all other claims listed in the Third Omnibus Objection, this matter is going forward.

- 16. Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability 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 12/21/18] (Docket No. 3529) (the "Fourth Omnibus Objection")

Response Deadline: January 16, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Sandra Thomas [Filed 1/10/19] (Docket No. 3557)
- B. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Gale Lee Wright [Filed 1/11/19] (Docket No. 3569)

- C. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Terry Ortego and Wanda Ortego [Filed 1/14/19] (Docket No. 3571)
- D. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Rochelle Sullivan [Filed 1/14/19] (Docket No. 3572)
- E. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Roger E. Smith [Filed 1/15/19] (Docket No. 3574)
- F. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Ismail Nasr [Filed 1/15/19] (Docket No. 3575)
- G. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Anita K. Nesbitt [Filed 1/15/19] (Docket No. 3577)
- H. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Jordan Taylor and Victoria Taylor [Filed 1/16/19] (Docket No. 3578)
- I. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Ryan C. Smith, Tashanda Smith [Filed 1/16/19] (Docket No. 3581)
- J. Amended Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Anita K. Nesbitt [Filed 1/16/19] (Docket No. 3588)
- K. Response to Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims Filed by Joseph Young [Filed 1/17/19] (Docket No. 3589)
- L. Objection Response to TATCTF's Omnibus Reply in Support of Fourth Omnibus Objection (Substantive) to No Liability Claims [Filed 1/17/19] (Docket No. 3595)

- M. Informal response of Angie L. Speziale (Claim No. P-0026117)
- N. Informal response of Jerry D. Sandberg (Claim No. P-0036040)
- O. Informal response of Manny Piantek (Claim No. 3893)
- P. Informal response of Charles M. Terry and Andrea N. Terry (Claim No. P-0031746)
- Q. Informal response of Cathy A. Molen (Claim No. P-0026823)
- R. Informal response of Thurman McLean (Claim Nos. P-0053007 and P-0023275)

Related Documents:

- A. Declaration of Harold R. Blomquist in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 12/21/18] (Docket No. 3530)
- B. Declaration of David Michael Rains in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 12/21/18] (Docket No. 3531)
- C. Notice of Submission of Proofs of Claim Regarding (i) Third Omnibus Objection of Eric D. Green, In His Capacity as Trustee of The Takata Airbag Tort Compensation Trust Fund, (Substantive) to No Liability Claims; and (ii) Fourth Omnibus Objection of Eric D. Green, In His Capacity as Trustee of The Takata Airbag Tort Compensation Trust Fund, (Substantive) to No Liability Claims [Filed 1/9/19] (Docket No. 3550)
- D. Omnibus Reply in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 1/17/19] (Docket No. 3592)
- E. Supplemental Declaration of Harold R. Blomquist in Support of the Omnibus Reply in Support of Third and Fourth Omnibus Objection of Eric D. Green, In His Capacity As Trustee Of The Takata Airbag Tort Compensation Trust Fund, (Substantive) To No Liability Claims [Filed 1/17/19] (Docket No. 3593)

Status: The Fourth Omnibus Objection is adjourned to the omnibus hearing scheduled for February 21, 2019 at 10:00 a.m. with respect to the claims of Anita K. Nesbit (Claim No. P-0052756) and Terry Ortego and Wanda Ortego (Claim No. 3707). With respect to all other claims listed in the Fourth Omnibus Objection, this matter is going forward.

Dated: January 18, 2019

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*