

**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
Eric D. Green, as Trustee of the Takata Airbag Tort Compensation Trust Fund, Plaintiff, v. Mitsui Sumitomo Insurance Company, Limited, Defendant.	Adv. Proc. No. 20-51004 (BLS)

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON APRIL 14, 2021 AT 10:30 A.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE BRENDAN L. SHANNON**

***PLEASE TAKE NOTICE THAT THE HEARING TIME HAS CHANGED
AND WILL NOW START AT 10:30 A.M. (ET).***

To participate in this hearing you must now register for the ZOOM call. When registering, please copy and paste the below link to your browser. Please remember to register with ZOOM well in advance of the hearing in order to avoid being denied access.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

**Topic: TK Holdings Inc. – Case No. 17-11375 (BLS)
When: Apr. 14, 2021 10:30 AM Eastern Time (US and Canada)**

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 Amended items noted in bold.

Register in advance for this meeting:

<https://debuscourts.zoomgov.com/meeting/register/vJisc-mgrDMiGVQnChQUfvntxEw7R9wcBYA>

After registering, you will receive a confirmation email containing information about joining the meeting.

ADJOURNED MATTER:

1. The Reorganized TK Holdings Trust's Nineteenth Omnibus Objection to Claims –Non-Substantive (Late Filed Claims) [Filed 10/28/19] (Docket No. 4020)

Response Deadline: November 11, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Response to the Reorganized TK Holdings Trust's Nineteenth Omnibus Objection Non-Substantive to Late Filed Claims Filed by James F. DeBouno Jr. [Filed 11/7/19] (Docket No. 4029)
- B. Response to Nineteenth Omnibus Objection to Claims Filed by Sudan Salaam [Filed 11/14/19] (Docket No. 4034)
- C. Response to Nineteenth Omnibus Objection to Claims Filed by Sudan Salaam [Filed 1/22/20] (Docket No. 4073)
- D. Response to Nineteenth Omnibus Objection to Claims Filed by Sudan Salaam [Filed 11/16/20] (Docket No. 4270)
- E. Response to Nineteenth Omnibus Objection to Claims Filed by Sudan Salaam [Filed 2/24/21] (Docket No. 4332)

Related Documents:

- A. [Signed] Order Sustaining The Reorganized TK Holdings Trust's Nineteenth Omnibus Objection To Claims - Non-Substantive [Filed 1/8/20] (Docket No. 4069)

Reply:

- A. Reply in Support of The Reorganized TK Holdings Trust's Nineteenth Omnibus Objection to Claims –Non-Substantive (Late Filed Claims) [Filed 1/03/20] (Docket No. 4059)

Status: This matter is adjourned to the next omnibus hearing with respect to the claim of James F. DeBouno. The Court has entered an order with respect to the remaining claims.

RESOLVED MATTERS:

2. Ninth 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 3/10/21] (Docket No. 4358)

Response Deadline: March 24, 2021 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Ninth 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 3/26/21] (Docket No. 4394)
- B. [Signed] Order Approving Ninth 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 3/26/21] (Docket No. 4397)

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

3. Ninth 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 3/19/21] (Docket No. 4384)

Response Deadline: April 2, 2021 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Ninth 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 4/5/21] (Docket No. 4413)
- B. [Signed] Ninth Order Extending the Deadline to Object to Certain Claim [Filed 4/8/21] (Docket No. 4415)

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

4. The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims

of Individuals) [Filed 2/9/21] ([Docket No. 4305](#))

Response Deadline: March 3, 2021 at 4:00 p.m. (ET).

Responses Received:

- A. Response to the Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Pauline Quarcoo [Filed 2/24/21] ([Docket No. 4331](#))
- B. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Leo F. Zakowski [Filed 2/25/21] ([Docket No. 4336](#))
- C. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Kristine M. White, Robert J. White [Filed 3/1/21] ([Docket No. 4340](#))
- D. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Darryl J. Fennell [Filed 3/1/21] ([Docket No. 4341](#))
- E. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Michael Scott Shannahan [Filed 3/2/21] ([Docket No. 4344](#))
- F. Response to the Reorganized TK Holdings Trusts Twenty-Third Omnibus Objection to Claims Non-Substantive Filed by David Earnest [Filed 3/3/21] ([Docket No. 4349](#))
- G. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Clifford Cideko [Filed 3/4/21] ([Docket No. 4350](#))
- H. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Gittel Kalikstein [Filed 3/8/21] ([Docket No. 4355](#))
- I. Response to The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Douglas Mink, Jennifer Mink [Filed 3/2/21] ([Docket No. 4343](#))

Reply:

- A. Reply in Support of The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims (Non-Substantive) [Filed 3/12/21] ([Docket No. 4364](#))

Related Documents:

- A. Notice of Submission of Proof of Claim in Connection with The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 3/3/21] ([Docket No. 4347](#))
- B. [Signed] Order Sustaining The Reorganized TK Holdings Trust's Twenty-Third Omnibus Objection to Claims - Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 3/15/21] ([Docket No. 4372](#))

Status: This matter is adjourned to the next omnibus hearing with respect to the claims of Leo F. Zakowski, Darryl Fennell, Jennifer and Douglas Mink, and Rafael and Gittel Kalikstein. The Court has entered an order with respect to the remaining claims.

MATTERS WITH CERTIFICATION OF COUNSEL:

5. The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 3/15/21] ([Docket No. 4369](#))

Response Deadline: March 31, 2021 at 4:00 p.m. (ET).

Responses Received:

- A. Informal response of Mark R. Paul
- B. Informal response of Sean Haynes
- C. Informal response of Mercey Peacock
- D. Informal response of Suzanne Sollner-Figler
- E. Informal response of Marilyn Sullivan
- F. Informal response of Peter Mayer
- G. Informal response of Cecilia Ayala
- H. Informal response of Nilufer N. Gonen
- I. Informal response of Nancy Smith

- J. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Cheryl S. Lemieux, Philip A. Lemieux [Filed 3/25/21] ([Docket No. 4393](#))
- K. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Daniel W. Stevens [Filed 3/26/21] ([Docket No. 4395](#))
- L. Response Filed by Jeanne M. Jackson, Angelia M. Moore [Filed 3/26/21] ([Docket No. 4396](#))
- M. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Jim Dunn [Filed 3/29/21] ([Docket No. 4399](#))
- N. Response to Omnibus Objection to Claims The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by David A. Mendoz [Filed 3/30/21] ([Docket No. 4400](#))
- O. Response to Omnibus Objection to Claims The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals). Filed by Harry D. Dunn, Lisa E. Dunn [Filed 3/30/21] ([Docket No. 4401](#))
- P. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Kenneth Kuo [Filed 3/31/21] ([Docket No. 4403](#))
- Q. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Suzanne Sollner-Figler [Filed 4/1/21] ([Docket No. 4405](#))
- R. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Helen Wong [Filed 4/1/21] ([Docket No. 4406](#))
- S. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Harry D. Dunn, Lisa E. Dunn [Filed 4/1/21] ([Docket No. 4407](#))

- T. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by James H. Brewer [Filed 4/1/21] ([Docket No. 4409](#))
- U. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Brenda K. Joiner [Filed 4/1/21] ([Docket No. 4410](#))
- V. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Richard M. Benstein [Filed 4/5/21] ([Docket No. 4411](#))
- W. Response to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) Filed by Robert R. Denard [Filed 4/6/21] ([Docket No. 4414](#))

Reply:

- A. Reply in Support of The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive [Filed 4/9/21] ([Docket No. 4416](#))

Related Documents:

- A. Notice of Corrected Exhibit "A" to The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 3/17/21] ([Docket No. 4375](#))
- B. Notice of Submission of Proof of Claim in Connection with The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 3/31/21] ([Docket No. 4402](#))
- C. Certification of Counsel Regarding The Reorganized TK Holdings Trust's Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 4/12/21] ([Docket No. 4418](#))
- D. **[Signed] Order Sustaining Twenty-Fifth Omnibus Objection to Claims -- Non-Substantive (Insufficient Information, Contingent and/or Unliquidated PPIC Claims of Individuals) [Filed 4/13/21] (Docket No. 4421)**

Status: **The Court has entered the order on this matter and it is now resolved.**

ADVERSARY STATUS CONFERENCE:

6. Complaint for Declaratory Relief by the Trustee for the Takata Airbag Tort Compensation Trust Fund 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 v. Mitsui Sumitomo Insurance Company, Limited [Filed 11/5/20] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 1](#))

Response Deadline: March 15, 2021

Responses Received:

- A. Motion to Dismiss Adversary Proceeding [Filed 3/15/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 37](#))

Related Documents:

- A. Summons and Notice of Pretrial Conference [Filed 11/9/20] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 3](#))
- B. Amended Summons and Notice of Pretrial Conference [Filed 11/9/20] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 4](#))
- C. Amended Summons and Notice of Pretrial Conference [Filed 2/17/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 20](#))
- D. Opening Brief in Support of Motion to Dismiss Adversary Proceeding [Filed 3/15/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 38](#))
- E. Response of the Trustee of the Takata Airbag Tort Compensation Trust Fund in Opposition to Mitsui Sumitomo Company, Limited's Motion to Dismiss [Filed 3/29/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 40](#))
- F. Reply Brief in Further Support of Defendant's Motion to Dismiss [Filed 4/5/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 41](#))
- G. Request for Oral Argument [Filed 4/7/21] (Adv. Proc. Case No. 20-51004, [Adv. Docket No. 42](#))

Status: A status conference will go forward on this matter as requested by the Court.

Dated: April 14, 2021

PACHULSKI STANG ZIEHL & JONES LLP

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