

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : **Chapter 11**

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TK HOLDINGS INC., et al., : **Case No. 17-11375 (BLS)**

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Debtors.¹ : **Joint Administration Requested**

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NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) HEARING ON FIRST DAY MOTIONS SCHEDULED FOR JUNE 27, 2017 AT 1:30 P.M. (ET)²

THE HEARING WILL TAKE PLACE AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM 5 (JUDGE CAREY'S COURTROOM), WILMINGTON, DELAWARE 19801 BEFORE THE HONORABLE BRENDAN L. SHANNON

PLEASE TAKE NOTICE that on June 25, 2017, each of the above-captioned debtors and debtors in possession (the “*Debtors*”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532.

PLEASE TAKE FURTHER NOTICE that, in addition to the filing of the voluntary petitions, the Debtors have filed the following first day motions and related documents (collectively, the “*First Day Motions*”):³

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 person who wishes to appear telephonically at the June 27, 2017 hearing must contact COURTCALL, LLC at 866-582-6878 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

³ All motions and other pleadings referenced herein are available online at the following address: <http://TKRestructuring.com>.

A. Declaration of Scott E. Caudill in Support of Debtors' Chapter 11 Petitions and First-Day Relief [Docket No. 19 - filed June 26, 2017]

B. First Day Motions:

1. Motion of Debtors Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of Order Directing Joint Administration of Chapter 11 Cases [Docket No. 3 - filed June 25, 2017]
2. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 345(b), 363(b), 363(c), 364(a), and 503(b) and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Provide Certain Postpetition Claims Administrative Expense Priority, (D) Continue Intercompany Funding of Certain Non-Debtors, and (E) Maintain Existing Bank Accounts and Business Forms; and (II) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b) [Docket No. 13 - filed June 26, 2017]
3. Motion of Debtors Pursuant to 11 U.S.C. § 1505 for Entry of an Order Authorizing TK Holdings, Inc. to Act as Foreign Representative on Behalf of the Debtors' Estates [Docket No. 4 - filed June 25, 2017]
4. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for Entry of an Interim Order (I) Authorizing Debtors to Enter into Accommodation Agreement and Access Agreement with Certain Customers, (II) Granting Adequate Protection in Connection Therewith, (III) Modifying the Automatic Stay to Implement and Effectuate the Terms Thereof, and (IV) Scheduling a Final Hearing [Docket No. 18 - filed June 26, 2017]
5. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b)(9) for Interim and Final Authority to Pay Prepetition Obligations Owed to Certain Critical Vendors [Docket No. 14 - filed June 26, 2017]

Related Document:

- i. Declaration of Scott Simpton in Support of the Debtors' Motions to Pay Prepetition Obligations Owed to Certain Critical Vendors, Foreign Vendors, and Lien Claimants [Docket No. 16 - filed June 26, 2017]
6. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), 503(b), and 507(a) for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Prepetition Obligations Owed to Certain Foreign Vendors and Lien Claimants and (II) Grant Administrative Status for Certain Goods Delivered to Debtors Postpetition [Docket No. 15 - filed June 26, 2017]

Related Document:

- i. Declaration of Scott Simpton in Support of the Debtors' Motions to Pay Prepetition Obligations Owed to Certain Critical Vendors, Foreign Vendors, and Lien Claimants [Docket No. 16 - filed June 26, 2017]
7. Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) for Interim and Final Authority to (I) Continue Tooling and Warranty Programs in the Ordinary Course of Business and Pay Prepetition Obligations Related Thereto, and (II) Authorize Banks to Honor and Process Related Checks and Transfers [Docket No. 10 - filed June 26, 2017]
8. Motion of Debtors Pursuant to 11 U.S.C. § 105(a), Fed. R. Bankr. P. 2002, 5005, and 9007, and Local Rules 2002-1(d) and 5005-4 for Entry of an Order (I) Approving the Form and Manner of Notice of Commencement, (II) Limiting Notice Required With Respect to Potential PSAN Claimants, Pending Further Order, and (III) Authorizing the Release of Records Necessary to Implement Special Noticing Procedures for Potential PSAN Claimants [Docket No. 9 - filed June 26, 2017]
9. Motion of Debtors Pursuant to 11 U.S.C. §§ 366 and 105(a) for Entry of Interim and Final Orders (I) Approving Debtors' Proposed form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 6 - filed June 25, 2017]
10. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, and Other Compensation and Benefits, and (II) Maintain Employee Benefit Programs and Pay Related Administrative Obligations [Docket No. 12 - filed June 26, 2017]
11. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 362(d), 363(b), and 503(b) and Fed. R. Bankr. P. 4001, 6003, and 6004 for Interim and Final Authority to Continue Insurance and Surety Bond Programs and Pay All Obligations With Respect Thereto [Docket No. 11 - filed June 26, 2017]
12. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), 507(a), and 541 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay Certain Prepetition Taxes and Assessments, and (II) Authorize Banks to Honor and Process Related Checks and Transfers [Docket No. 7 - filed June 26, 2017]
13. Motion of Debtors Pursuant to 11 U.S.C. § 105 for Entry of an Order Enforcing the Protections of 11 U.S.C. §§ 362, 365, 525, and 541(c) [Docket No. 8 - filed June 26, 2017]

14. Application of Debtors Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) and Local Rule 2002-1(f) for Appointment of Prime Clerk LLC as Claims and Noticing Agent [Docket No. 5 - filed June 25, 2017]

PLEASE TAKE FURTHER NOTICE that a hearing (the “*First Day Hearing*”) with respect to the First Day Motions is scheduled for **June 27, 2017 at 1:30 p.m.** (prevailing Eastern Time) at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801 before The Honorable Brendan L. Shannon, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that all objections, if any, to the relief requested in the First Day Motions may be made at the First Day Hearing.

Dated: June 26, 2017
Wilmington, Delaware

/s/ Brett M. Haywood
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