

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re

TK HOLDINGS INC., et al.

Debtors.¹

TK HOLDINGS INC., et al.

Plaintiffs,

– against –

STATE OF HAWAII, by its Office of Consumer Protection, GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, STATE OF NEW MEXICO, *ex rel.* HECTOR BALDERAS, Attorney General, et al.,

Defendants.

Chapter 11

Case No. 17–11375 (BLS)

Jointly Administered

Adv. Pro. No. 17-50880 (BLS)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON DECEMBER 18, 2017 AT 10:00 A.M. (EST)**²

I. RESOLVED MATTER:

1. Debtors' Application Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016, for Authorization to Retain Meunier Carlin & Curfman LLC as Special Intellectual Property Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 1263 - filed November 29, 2017]

Objection / Response Deadline: December 11, 2017 at 4:00 p.m. (EST)

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 hearing will be held before The Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the December 18, 2017 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (EST) on Friday, December 15, 2017 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

Objections / Responses Received: Informal response of the Office of the United States Trustee

Related Documents:

- i. Certificate of No Objection Regarding Debtors' Application Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016, for Authorization to Retain Meunier Carlin & Curfman LLC as Special Intellectual Property Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 1352 - filed December 12, 2017]
- ii. Order Authorizing the Employment and Retention of Meunier Carlin & Curfman LLC as Special Intellectual Property Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 1362 - entered December 13, 2017]

Status: On December 13, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is only required to the extent the Court has questions or concerns.

II. CONTESTED MATTER GOING FORWARD:

2. Motion of Joseph Graves for Relief of the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [Docket No. 1161 - filed November 15, 2017]

Objection / Response Deadline: December 11, 2017 at 4:00 p.m. (EST)

Objections / Responses Received:

- A. Debtors' Objection to Motion of Joseph Graves for Relief from the Automatic Stay Pursuant to 11 USC § 362(d)(1) [Docket No. 1340 - filed December 11, 2017]

Related Documents:

- i. Amended Notice: Motion of Joseph Graves for Relief of the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [Docket No. 1162 - filed November 15, 2017]

Status: The hearing on this matter is going forward.

III. ADVERSARY PROCEEDING:

3. Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 116 - filed November 6, 2017]

Objections / Responses Received:

- A. Limited General Objection of the Beaubien Objectors to Debtors' Motion to Extend 90-Day Preliminary Injunction and to Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Enter into and Perform Under Restructuring Support Agreement; (II) Approving Plan Sponsor Protections; and (III) Modifying the Automatic Stay [Adv. Docket No. 129 - filed November 13, 2017]
- B. Limited Objection of Kay Sperling to Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 132 - filed November 14, 2017]
- C. Joinder of Shonda McCall, Individually, and as Parent and Natural Guardian to J.G.P., in the Limited Objection of Kay Sperling to Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 133 - filed November 14, 2017]
- D. Statement of the Official Committee of Unsecured Tort Claimant Creditors Regarding Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Docket No. 134 - filed November 14, 2017]
- E. Answering Brief of Defendants State of Hawai'i, Government of the United States Virgin Islands and State of New Mexico in Opposition to Debtors' Motion to Extend Preliminary Injunction [Adv. Docket No. 141 - filed November 16, 2017]
- F. Intervening OEMs' Reply in Support of Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 144 - filed November 17, 2017]
- G. Debtors' Omnibus Reply in Further Support of Their Motion to Extend Preliminary Injunction [Adv. Docket No. 146 - filed November 17, 2017]
- H. Sur-reply Brief of Defendants of State of Hawai'i Government of the United States Virgin Islands and State of New Mexico in Opposition to Intervening OEMs' Reply in Support of Debtors' Motion to Extend Preliminary Injunction [Adv. Docket No. 149 - filed November 19, 2017]
- I. Exhibit B to Sur-reply Brief of Defendants of State of Hawai'i Government of the United States Virgin Islands and State of New Mexico in Opposition to Intervening OEMs' Reply in Support of Debtors' Motion to Extend Preliminary Injunction [Adv. Docket No. 149 - filed November 19, 2017]

Related Documents:

- i. Verified Complaint for Injunctive Relief [Adv. Docket No. 1 - filed July 13, 2017]
- ii. Motion for Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a) [Adv. Docket No. 2 - filed July 13, 2017]
- iii. Debtors' Brief in Support of Their Motion for a Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a) [Adv. Docket No. 3 - filed July 13, 2017]
- iv. Declaration of Theodore E. Tsekerides in Support of Debtors' Motion for a Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a) [Adv. Docket No. 4 - filed July 13, 2017]
- v. Declaration of Scott E. Caudill in Support of Debtors' Motion for a Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a) [Adv. Docket No. 5 - filed July 13, 2017]
- vi. Debtors' Omnibus Reply in Support of Their Motion for a Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 36 - filed August 7, 2017]
- vii. Transcript Regarding Hearing Held 8/9/2017 [Adv. Docket No. 47 - filed August 10, 2017]
- viii. Order Pursuant to 11 U.S.C. § 105 Granting in Part and Denying in Part Debtors' Motion for a Preliminary Injunction [Adv. Docket No. 63 - entered August 22, 2017]
- ix. Transcript Regarding Hearing Held 8/16/2017 [Adv. Docket No. 64 - filed August 23, 2017]
- x. Debtors' Motion for Leave to Amend Complaint [Adv. Docket No. 115 - filed November 6, 2017]
- xi. Debtors' Brief in Support of Their Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 117 - filed November 6, 2017]
- xii. Order Setting Briefing Schedule on Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 124 - entered November 9, 2017]
- xiii. Bridge Order Pursuant to 11 U.S.C. § 105(a) Extending Preliminary Injunction [Adv. Docket No. 135 - filed November 15, 2017]

- xiv. Statement of the Official Committee of Unsecured Creditors in Support of the Debtors' Motion to Extend 90-Day Preliminary Injunction Pursuant to 11 U.S.C. § 105(a) [Adv. Docket No. 138 - filed November 16, 2017]
- xv. Order Pursuant to 11 U.S.C. § 105(a) (I) Granting Debtor's Motion to Extend 90-Day Preliminary Injunction as to Individual Actions and New Actions, (II) Extending Preliminary Injunction as to State Actions for 30 Days, and (III) Granting Debtors' Motion for Leave to Amend Complaint [Adv. Docket No. 160 - filed November 27, 2017]
- xvi. Verified Amended Complaint for Injunctive Relief [Adv. Docket No. 162 - filed November 27, 2017]

Status: The hearing with respect to the State Actions has been resolved in principle and the parties are working to document the resolutions. The Debtors intend to submit a stipulation under certification of counsel regarding this matter. Accordingly, a hearing on this matter is not necessary at this time.

Dated: December 14, 2017
Wilmington, Delaware

/s/ Brett M. Haywood

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