

**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.**<sup>1</sup> : **Jointly Administered**
  
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**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 30, 2017 AT 1:00 P.M. (EDT)<sup>3</sup>**

**I. CONTINUED / RESOLVED MATTERS:**

1. Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and Local Rules 2002-1(e), 3001-1, and 3003-1 for Authority to (I) Establish Deadlines for Filing Proofs of Claim, (II) Establish the Form and Manner of Notice Thereof, and (III) Approve Procedures for Providing Notice of Bar Date and Other Important Deadlines and Information to Potential PSAN Inflater Claimants [Docket No. 171 - filed July 7, 2017]

Objection / Response Deadline: July 19, 2017 at 4:00 p.m. (EDT); extended to August 3, 2017 at 4:00 p.m. (EDT) for the Office of the United States Trustee (the “U.S. Trustee”), the Official Committee of Unsecured Creditors (the “UCC”), the Official Committee of Unsecured Tort Claimant Creditors Committee (the “Tort Committee”), and the for the plaintiffs in the

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<sup>1</sup>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.

<sup>2</sup> **Amended items appear in bold.**

<sup>3</sup> 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 August 30, 2017 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (EDT) on Tuesday, August 29, 2017 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

multidistrict litigation action (the “MDL Action Plaintiffs”)

Objections / Responses Received:

- A. Limited Objection by the Government of the U.S. Virgin Islands and the State of Hawai’i by Its Office of Consumer Protection to the Debtors’ Motion for an Order Establishing Bar Dates for Filing Claims [Docket No. 272 - filed July 18, 2017]
- B. Limited Objection by the Tennessee Department of Commerce and Insurance - Division of Consumer Affairs to the Debtors’ Motion for an Order Establishing Bar Dates for Filing Claims and for Approval of the Manner of Notice to Creditors [Docket No. 281 - filed July 19, 2017]
- C. Notice of Joinder (filed by the State of South Carolina) [Docket No. 297 - filed July 24, 2017]
- D. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors’ (I) Bar Date Motion; and (II) Motion for a Future Claimants Representative [Docket No. 380 - filed August 3, 2017]
- E. The MDL Plaintiffs’ Objection to Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and Local Rules 2002-1(e), 3001-1, and 3003-1 for Authority to (I) Establish Deadlines for Filing Proofs of Claim, (II) Establish the Form and Manner of Notice Thereof, and (III) Approve Procedures for Providing Notice of Bar Date and Other Important Deadlines and Information to Potential PSAN Inflation Claimants [Docket No. 382 - filed August 3, 2017]
- F. Objection of Official Committee of Unsecured Tort Claimant Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and Local Rules 2002-1(e), 3001-1, and 3003-1 for Authority to (I) Establish Deadlines for Filing Proofs of Claim, (II) Establish the Form and Manner of Notice Thereof, and (III) Approve Procedures for Providing Notice of Bar Date and Other Important Deadlines and Information to Potential PSAN Inflation Claimants [Docket No. 385 - filed August 3, 2017]
- G. United States Trustee’s Objection to the Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and Local Rules 2002-1(e), 3001-1, and 3003-1 for Authority to (I) Establish Deadlines for Filing Proofs of Claim, (II) Establish the Form and Manner of Notice Thereof, and (III) Approve Procedures for Providing Notice of Bar Date and Other Important Deadlines and

Information to Potential PSAN Inflater Claimants (D.E. 171) [Docket No. 386 - filed August 3, 2017]

- H. Informal comments from the U.S. Trustee
- I. Informal comments from the Tort Committee
- J. Informal comments from Roger Frankel as proposed Future Claimant's Representative

Related Document:

- i. Notice of Filing Exhibit B-2 to Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and Local Rules 2002-1(e), 3001-1, and 3003-1 for Authority to (I) Establish Deadlines for Filing Proofs of Claim, (II) Establish the Form and Manner of Notice Thereof, and (III) Approve Procedures for Providing Notice of Bar Date and Other Important Deadlines and Information to Potential PSAN Inflater Claimants [Docket No. 282 - filed July 19, 2017]

Status: The hearing on this matter has been continued to the hearing scheduled for September 11, 2017 at 10:00 a.m. (EDT).

- 2. Motion of Debtors for Entry of Order Extending Time to File (I) Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Rule 2015.3 Reports [Docket No. 317 - filed July 25, 2017]

Objection / Response Deadline: August 8, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received: None.

Related Document:

- i. Certificate of No Objection Regarding Motion of Debtors for Entry of Order Extending Time to File (I) Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Rule 2015.3 Reports [Docket No. 450 - filed August 9, 2017]
- ii. Order Extending Time to File (I) Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Rule 2015.3 Reports [Docket No. 489 - entered August 10, 2017]

Status: On August 10, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 3. Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for

Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 376 - filed August 3, 2017]

Objection / Response Deadline: August 17, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

A. Informal comments from the Debtors

Related Document:

- i. Certification of Counsel Regarding Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 549 - filed August 22, 2017]
- ii. Order Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 Authorizing the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 562 - entered August 23, 2017]
- iii. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)

Status: On August 23, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

4. Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Gilbert LLP as Insurance Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 377 - filed August 3, 2017]

Objection / Response Deadline: August 17, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

A. Informal comments from the Debtors

Related Document:

- i. Certification of Counsel Regarding Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Gilbert LLP as Insurance Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 550 - filed August 22, 2017]
- ii. Order Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 Authorizing the Employment and Retention of Gilbert LLP as Insurance Counsel for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 7, 2017 [Docket No. 560 - entered August 23, 2017]
- iii. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)

Status: On August 23, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

5. Application of the Official Committee of Tort Claimant Creditors of TK Holdings Inc., *et al.*, for Order: (A) Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor *Nunc Pro Tunc* to July 9, 2017; and (B) Modifying Information Requirements of Local Rule 2016-2(d) [Docket No. 414 - filed August 17, 2017]

Objection / Response Deadline: August 21, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal comments from the Debtors
- B. Informal comments from the U.S. Trustee

Related Document:

- i. Certification of Counsel Regarding Application of the Official Committee of Tort Claimant Creditors of TK Holdings Inc., *et al.*, for Order: (A) Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor *Nunc Pro Tunc* to July 9, 2017; and

(B) Modifying Information Requirements of Local Rule 2016-2(d)  
[Docket No. 553 - filed August 22, 2017]

- ii. Order Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor *Nunc Pro Tunc* to July 9, 2017; and (B) Modifying Information Requirements of Local Rule 2016-2(d) [Docket No. 561 - entered August 23, 2017]
- iii. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)

Status: On August 23, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 6. Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328(a), Fed. R. Bankr. P. 2014(a), and Local Rule 2014-1 for Authority to Retain and Employ Ernst & Young LLP as Tax Advisors to the Debtors, *Nunc Pro Tunc* to the Petition Date [Docket No. 438 - filed August 8, 2017]

Objection / Response Deadline: August 22, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee

Related Document:

- i. Certification of Counsel Regarding Order Approving Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328(a), Fed. R. Bankr. P. 2014(a), and Local Rule 2014-1 for Authority to Retain and Employ Ernst & Young LLP as Tax Advisors to the Debtors, *Nunc Pro Tunc* to the Petition Date [Docket No. 578 - filed August 24, 2017]
- ii. Order Approving Application of Debtors Pursuant to 11 U.S.C. § 327(a) and 328(a), Fed. R. Bankr. P. 2014(a), and Local Rule 2014-1 for Authority to Retain and Employ Ernst & Young LLP as Tax Advisors to the Debtors, *Nunc Pro Tunc* to the Petition Date [Docket No. 590 - entered August 25, 2017]

Status: On August 25, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 7. Motion of the Official Committee of Unsecured Creditors for an Order Establishing Information Sharing Procedures for Compliance with 11 U.S.C. §§

1102(b)(3) and 1103(c), *Nunc Pro Tunc* to July 6, 2017 [Docket No. 454 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

A. Informal comments from the Debtors

Related Document:

- i. Certification of Counsel Regarding Motion of the Official Committee of Unsecured Creditors for an Order Establishing Information Sharing Procedures for Compliance with 11 U.S.C. §§ 1102(b)(3) and 1103(c), *Nunc Pro Tunc* to July 6, 2017 [Docket No. 577 - filed August 24, 2017]
- ii. Order Establishing Information Sharing Procedures for Compliance with 11 U.S.C. §§ 1102(b)(3) and 1103(c), *Nunc Pro Tunc* to July 6, 2017 [Docket No. 592 - filed August 25, 2017]

Status: On August 25, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

8. Application of Official Committee of Unsecured Creditors of TK Holdings Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Counsel Effective as of July 6, 2017 [Docket No. 455 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Document:

- i. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)
- ii. Supplemental Declaration of Abhilash M. Raval in Support of Application of Official Committee of Unsecured Creditors of TK Holdings Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of

Milbank, Tweed, Hadley & McCloy LLP as Counsel Effective as of July 6, 2017 [Docket No. 567 - filed August 23, 2017]

- iii. Certificate of No Objection Regarding Application of Official Committee of Unsecured Creditors of TK Holdings Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Counsel Effective as of July 6, 2017 [Docket No. 574 - filed August 24, 2017]
- iv. Order Under 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014 and 5002, and Local Bankruptcy Rule 2014-1 Authorizing Retention and Employment of Milbank, Tweed, Hadley & McCloy LLP as Counsel Effective as of July 6, 2017 [Docket No. 588 - entered August 25, 2017]

Status: On August 25, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 9. Application of Official Committee of Unsecured Creditors of TK Holdings, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 6, 2017 [Docket No. 456 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the Debtors

Related Document:

- i. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)
- ii. Certification of Counsel Regarding Application of Official Committee of Unsecured Creditors of TK Holdings, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 6, 2017 [Docket No. 576 - filed August 24, 2017]
- iii. Order Granting Application of Official Committee of Unsecured Creditors of TK Holdings, Inc., *et al.*, for Entry of an Order Authorizing the



Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 6, 2017 [Docket No. 587 - entered August 25, 2017]

Status: On August 25, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

10. Application of the Official Committee of Unsecured Creditors of TK Holdings, Inc. for Entry of an Order Authorizing the Employment and Retention of Zolfo Cooper, LLC as Bankruptcy Consultant and Financial Advisor, *Nunc Pro Tunc* to July 10, 2017 [Docket No. 457 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee

Related Document:

- i. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)
- ii. Certification of Counsel Regarding Application of the Official Committee of Unsecured Creditors of TK Holdings, Inc. for Entry of an Order Authorizing the Employment and Retention of Zolfo Cooper, LLC as Bankruptcy Consultant and Financial Advisor, *Nunc Pro Tunc* to July 10, 2017 [Docket No. 575 - filed August 24, 2017]
- iii. Order Authorizing the Official Committee of Unsecured Creditors of TK Holdings, Inc. to Employ and Retain Zolfo Cooper, LLC as Bankruptcy Consultant and Financial Advisor, *Nunc Pro Tunc* to July 10, 2017 [Docket No. 591 - filed August 25, 2017]

Status: On August 25, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

11. Application of the Official Committee of Unsecured Creditors of TK Holdings Inc., *et al.*, to Retain and Employ Epiq Bankruptcy Solutions, LLC as Information Agent *Nunc Pro Tunc* to August 3, 2017 [Docket No. 461 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal comments from the Debtors
- B. Informal comments from the U.S. Trustee

Related Document:

- i. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)
- ii. Notice of Withdrawal [Docket No. 579 - filed August 24, 2017]

Status: The proposed counsel for the UCC has withdrawn this matter. Accordingly, a hearing on this matter is no longer necessary.

- 12. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363, and 503 for Authority to Pay Fees and Expenses Incurred by the NHTSA Monitor, to Pay the NHTSA Civil Penalty, and to Honor Certain Related Obligations [Docket No. 510 - filed August 11, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT); extended to August 25, 2017 at 4:00 p.m. (EDT) for the UCC and Tort Committee

Objections / Responses Received:

- A. Limited Objection of Official Committee of Unsecured Tort Claimant Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363, and 503 for Authority to Pay Fees and Expenses Incurred by the NHTSA Monitor, to Pay the NHTSA Civil Penalty, and to Honor Certain Related Obligations [Docket No. 595 - filed August 25, 2017]

Related Document:

- i. Notice of Filing of TK Holdings Inc. NHTSA Monitor Indemnification Agreement [Docket No. 539 - filed August 18, 2017]

Status: The hearing on this matter is continued to the omnibus hearing on September 18, 2017 at 10:00 a.m. (EDT).

**II. UNCONTESTED MATTERS GOING FORWARD:**

13. 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]

Objection / Response Deadline: July 19, 2017 at 4:00 p.m. (EDT); extended to July 21, 2017 at 4:00 p.m. (EDT) for the U.S. Trustee, for further interim relief requested; extended to July 24, 2017 at 2:00 p.m. (EDT) for the UCC and the Tort Committee for further interim relief requested and extended to August 3, 2017 at 4:00 p.m. (EDT) for the U.S. Trustee for further interim relief; extended to August 7, 2017 at 11:00 a.m. (EDT) for the UCC and the Tort Committee for further interim relief; further extended to August 23, 2017 at 4:00 p.m. (EDT); extended to August 28, 2017 at 11:00 a.m. (EDT) for the UCC and the Tort Committee

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the UCC
- C. Informal comments from the Tort Committee

Related Documents:

- i. Interim Order 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. 104 - entered June 27, 2017]

- ii. Notice of Entry of (A) Interim Order 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) and (B) Final Hearing Thereon [Docket No. 132 - filed June 28, 2017]
- iii. Second Interim Order 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. 328 - entered July 26, 2017]
- iv. Third Interim Order 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. 444 - entered August 9, 2017]

Status: The Debtors believe they have resolved the informal comments received with respect to this matter. Accordingly, the Debtors intend to submit a proposed revised form of order granting the relief requested in this motion under certification or present such an order at the hearing.

14. Application of Debtors Pursuant to 11 U.S.C. §§ 327(a) and 328(a) of the Bankruptcy Code, Fed. R. Bankr. P. 2014 and 2016 and Local Rules 2014-1 and 2016-2 for Authority to Retain and Employ Lazard Frères & Co. LLC and Lazard Frères K.K. as Investment Banker to the Debtors *Nunc Pro Tunc* to the Petition Date and Waive Certain Information Requirements of Local Rule 2016-2 [Docket No. 318 - filed July 25, 2017]

Objection / Response Deadline: August 8, 2017 at 4:00 p.m. (EDT);  
extended to August 15, 2017 at 4:00 p.m.  
(EDT) for the U.S. Trustee and the Tort  
Committee

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Document:

i. **Notice of Filing Addendum to Engagement Letter for Lazard Frères  
& Co. LLC and Lazard Frères K.K. [Docket No. 615 - filed August 28,  
2017]**

Status: The hearing on this matter will go forward.

15. Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) for Authority to Enter  
Into the TKAG Allocation Agreement [Docket No. 501 - filed August 11, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Informal inquiries from the UCC
- B. Informal inquiries from the Tort Committee
- C. Informal comments from General Motors

Related Document:

i. **Certification of Counsel Regarding Order Pursuant to 11 U.S.C. §§  
363 and 105(a) and Authorizing Debtors to Enter Into the TKAG  
Allocation Agreement [Docket No. 635 - filed August 29, 2017]**

Status: **On August 29, 2017, the Debtors filed a certification of counsel  
regarding this matter. Accordingly, a hearing regarding this matter is  
required only to the extent the Court has any questions or concerns.**

### **III. CONTESTED MATTERS GOING FORWARD:**

16. Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order  
Appointing Larry E. Coben as Future Claims Representative [Docket No. 285 -  
filed July 20, 2017]

Objection / Response Deadline: August 14, 2017 at 5:00 p.m. (EDT)

Objections / Responses Received:

- A. Official Committee of Unsecured Tort Claimant Creditors' Response to the Motions to Appoint Future Claims Representatives [Docket No. 381 - filed August 3, 2017]
- B. Objection of the MDL Plaintiffs to the Motions to Appoint Future Claims Representatives [Docket No. 384 - filed August 3, 2017]
- C. Debtors' Objection to Attorneys Information Exchange Group's Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order Appointing Larry E. Coben as Future Claims Representative [Docket No. 517 - filed August 14, 2017]
- D. Limited Objection of the Official Committee of Unsecured Creditors to the Attorneys Information Exchange Group's Motion for a Future Claims Representative [Docket No. 518 - filed August 14, 2017]
- E. Attorney Information Exchange Group's Reply to Objections to the Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order Appointing Larry E. Coben as Future Claims Representative [Docket No. 596 - filed August 25, 2017]

Related Document: None.

Status: The hearing on this matter will go forward.

- 17. Debtors' Motion for an Order Appointing Roger Frankel as Legal Representative for Future Personal Injury Claimants *Nunc Pro Tunc* to July 20, 2017 [Docket No. 288 - filed July 20, 2017]

Objection / Response Deadline: August 3, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Attorney Information Exchange Group's Objection to the Debtors' Motion for an Order Appointing Roger Frankel as Legal Representative for Future Personal Injury Claimants *Nunc Pro Tunc* to July 20, 2017 [Doc. No. 288] [Docket No. 379 - filed August 3, 2017]
- B. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) Bar Date Motion; and (II) Motion for a Future Claimants Representative [Docket No. 380 - filed August 3, 2017]
- C. Official Committee of Unsecured Tort Claimant Creditors' Response to the Motions to Appoint Future Claims Representatives [Docket No. 381 - filed August 3, 2017]

- D. Objection of the MDL Plaintiffs to the Motions to Appoint Future Claims Representatives [Docket No. 384 - filed August 3, 2017]
- E. Debtors' Omnibus Reply in Support of Their Motion for an Order Appointing Roger Frankel as Legal Representative for Future Personal Injury Claimants *Nunc Pro Tunc* to July 20, 2017 [Docket No. 589 - filed August 25, 2017]

Related Document: None.

Status: The hearing on this matter will go forward.

- 18. Application for an Order Authorizing the Proposed Future Claimants' Representative to Retain and Employ Frankel Wyron LLP as Counsel, *Nunc Pro Tunc* to July 24, 2017 [Docket No. 296 - filed July 24, 2017]

Objection / Response Deadline: August 7, 2017 at 5:00 p.m. (EDT)

Objections / Responses Received:

- A. Attorneys Information Exchange Group's Objection to the Application for an Order Authorizing the Proposed Future Claimants' Representative to Retain and Employ Frankel Wyron LLP as Counsel, *Nunc Pro Tunc* to July 24, 2017 [Doc. No. 296] [Docket No. 411 - filed August 7, 2017]
- B. Informal comments from the U.S. Trustee

Related Document:

- i. Declaration of Roger Frankel, the Proposed Future Claimants' Representative, in Support of the Applications to Retain and Employ Frankel Wyron LLP and Ashby & Geddes, P.A. as Counsel, *Nunc Pro Tunc* to July 24, 2017 [Docket No. 336 - filed July 27, 2017]

Status: Counsel for the Proposed Future Claimants' Representative and the U.S. Trustee have reached a resolution regarding the informal comments and intend to present a revised proposed form of order at the time of the hearing should the Court approve Roger Frankel's appointment as legal representative for the future personal injury claimants.

- 19. Application for an Order Authorizing the Proposed Future Claimants' Representative to Retain and Employ Ashby & Geddes, P.A. as Co-Counsel, *Nunc Pro Tunc* to July 24, 2017 [Docket No. 298 - filed July 24, 2017]

Objection / Response Deadline: August 7, 2017 at 5:00 p.m. (EDT)

Objections / Responses Received:

- A. Attorneys Information Exchange Group's Objection to the Application for an Order Authorizing the Proposed Future Claimants' Representative to Retain and Employ Ashby & Geddes, P.A. as Co-Counsel, *Nunc Pro Tunc* to July 24, 2017 [Doc. No. 298] [Docket No. 412 - filed August 7, 2017]
- B. Informal comments from the U.S. Trustee

Related Document:

- i. Declaration of Roger Frankel, the Proposed Future Claimants' Representative, in Support of the Applications to Retain and Employ Frankel Wyrton LLP and Ashby & Geddes, P.A. as Counsel, *Nunc Pro Tunc* to July 24, 2017 [Docket No. 336 - filed July 27, 2017] (*Document located under tab 18.i.*)

Status: Counsel for the Proposed Future Claimants' Representative and the U.S. Trustee have reached a resolution regarding the informal comments and intend to present a revised proposed form of order at the time of the hearing should the Court approve Roger Frankel's appointment as legal representative for the future personal injury claimants.

- 20. Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings for the Official Committee of Unsecured Tort Claimant Creditors, *Nunc Pro Tunc* to July 21, 2017 [Docket No. 378 - filed August 3, 2017]

Objection / Response Deadline: August 17, 2017 at 4:00 p.m. (EDT);  
extended for Debtors to August 23, 2017 at  
4:00 p.m. (EDT)

Objections / Responses Received:

- A. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017]
- B. Informal comments from the U.S. Trustee
- C. Reply to Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee



of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 594 - filed August 25, 2017]

- D. **Joinder of the OEM Customer Group to Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 636 - filed August 29, 2017]**

Related Document: None.

Status: **The hearing on this matter has been continued to the hearing scheduled for September 18, 2017 at 10:00 a.m. (EDT).**

21. Motion of SGS U.S. Testing Company, Inc. for Relief of Automatic Stay Under Section 362 of the Bankruptcy Code [Docket No. 448 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Debtors' Objection to the Motion of SGS U.S. Testing Company, Inc. for Relief of Automatic Stay Under Section 362 of the Bankruptcy Code [Docket No. 564 - filed August 23, 2017]
- B. Objection of Takata Corporation and Joinder in the Chapter 11 Debtors' Objection to Motion of SGS U.S. Testing Company, Inc. for Relief of Automatic Stay Under Section [Docket No. 565 - filed August 23, 2017]
- C. SGS U.S. Testing Company, Inc.'s Reply in Further Support of Its Motion for Relief of Automatic Stay Under Section 362 of the Bankruptcy Code [Docket No. 581 - filed August 25, 2017]

Related Document: None.

Status: The hearing on this matter will go forward.

22. Official Committee of Unsecured Creditors' Application for Entry of an Order (I) Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker for the Committee, Effective *Nunc Pro Tunc* to July 7, 2017, and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 458 - filed August 9, 2017]

Objection / Response Deadline: August 23, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Limited Objection of General Motors LLC, Volkswagen Group of America, Inc., FCA US LLC, Honda North America, Inc., Ford Motor Company, and Toyota Motor Engineering & Manufacturing North America, Inc., to Official Committee of Unsecured Creditors' Application for Entry of an Order (I) Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker for the Committee, Effective *Nunc Pro Tunc* to July 7, 2017, and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 568 - filed August 23, 2017]
- B. Informal comments from U.S. Trustee

Related Document:

- i. Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 566 - filed August 23, 2017] (*Document located under tab 20.A.*)
- ii. **Joinder of the OEM Customer Group to Debtors' (A) Statement Regarding Retention of Committee Professionals and (B) Objection to Application of the Official Committee of Unsecured Tort Creditors for Authorization to Employ and Retain Sakura Kyodo Law Offices as Special Counsel for Japanese Proceedings *Nunc Pro Tunc* to July 21, 2017 [Docket No. 636 - filed August 29, 2017] (*Document located under tab 20.D.*)**
- iii. **Motion of the Official Committee of Unsecured Creditors for Leave to File and Serve a Late Reply in Support of Application for Entry of an Order (I) Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker for the Committee, Effective *Nunc Pro Tunc* to July 7, 2017, and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 and in Response to the Limited Objection filed by the Objecting OEMS [Docket No. 637 - filed August 29, 2017]**

Status: The hearing on this matter will go forward.

Dated: August 29, 2017  
Wilmington, Delaware

*/s/ Brett M. Haywood*

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