

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : **Chapter 11**

:

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

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Debtors.¹ : **Jointly Administered**

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NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON OCTOBER 2, 2017 AT 10:00 A.M. (EDT)³

I. UNCONTESTED MATTER WITH CERTIFICATE OF NO OBJECTION:

1. Motion of Debtors in Furtherance of Notice of Commencement Order Directing California Department of Motor Vehicles to Release California Requested Record Information [Docket No. 790 - filed September 18, 2017]

Objection / Response Deadline: September 27, 2017 at 12:00 p.m. (EDT)

Objections / Responses Received: None.

Related Documents:

- i. Motion of Debtors for Order Shortening Notice and Objection Periods with Respect to Motion of Debtors in Furtherance of Notice of Commencement Order Directing California Department of Motor Vehicles to Release California Requested Record Information [Docket No. 791 - filed September 18, 2017]

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 appear in bold.**

³ 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 October 2, 2017 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (EDT) on Friday, September 29, 2017 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

- ii. Order Shortening Notice and Objection Periods with Respect to Motion of Debtors in Furtherance of Notice of Commencement Order Directing California Department of Motor Vehicles to Release California Requested Record Information [Docket No. 794 - entered September 19, 2017]
- iii. Certificate of No Objection Regarding Motion of Debtors in Furtherance of Notice of Commencement Order Directing California Department of Motor Vehicles to Release California Requested Record Information [Docket No. 874 - filed September 28, 2017]
- iv. **Order in Furtherance of Notice of Commencement Order Directing California Department of Motor Vehicles to Release California Requested Record Information [Docket No. 882 - entered September 28, 2017]**

Status: On September 28, 2017, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

II. UNCONTESTED MATTER GOING FORWARD

- 2. Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 818 - filed September 22, 2017]

Objection / Response Deadline: September 29, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received: None.

Related Documents:

- i. Motion to Shorten Time re: Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 819 - filed September 22, 2017]
- ii. Order Granting Motion to Shorten Time re: Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 843 - entered September 25, 2017]
- iii. Notice of Hearing on Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the

Accommodation Agreement and Access Agreement [Docket No. 851 - filed September 26, 2017]

Status: The hearing on this matter is going forward.

III. CONTESTED MATTERS:

3. 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 and Final 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] (the "Accommodation Agreement Motion")

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 Office of the United States Trustee (the "U.S. Trustee"); extended to August 3, 2017 at 4:00 p.m. (EDT) for the plaintiffs in the multidistrict litigation action (the "MDL Plaintiffs"); extended to August 7, 2017 at 11:00 a.m. (EDT) for Official Committee of Unsecured Tort Creditors (the "Tort Committee"); extended to August 9, 2017 at 4:00 p.m. (EDT) for the Official Committee of Unsecured Trade Creditors (the "UCC"); further extended to September 22, 2017 at 4:00 p.m. (EDT) for Tort Committee, the UCC, and the Future Claimants' Representative; further extended to September 26, 2017 at 9:00 a.m. (EDT) for the UCC

Objections / Responses Received:

- A. Limited Objection by the Government of the U.S. Virgin Islands and the State of Hawai'i to Motion for Entry of a Final Order Approving the Accommodation Agreement [Docket No. 283 - filed July 19, 2017]
- B. The MDL Plaintiffs' Objection to Debtors' Request for Final Order Approving Relief Requested in 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 and Final 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. 383 - filed August 3, 2017]

- C. Exhibits A and B to the MDL Plaintiffs' Objection to Debtors' Request for Final Order Approving Relief Requested in 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 and Final 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. 387 - filed August 3, 2017]
- D. Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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. 402 - filed August 4, 2017]
- E. Objection of the Future Claimants' Representative to 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 and Final 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. 812 - filed September 22, 2017]
- F. Supplemental Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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 (SEALED) [Docket No. 813 - filed September 22, 2017]
- G. Declaration of Jeffrey L. Kandel in Support of Supplemental Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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 (SEALED) [Docket No. 814 - filed September 22, 2017]

- H. Declaration of Charles M. Moore in Support of Supplemental Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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. 815 - filed September 22, 2017]
- I. Supplemental Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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 (REDACTED) [Docket No. 816 - filed September 22, 2017]
- J. Declaration of Jeffrey L. Kandel in Support of Supplemental Objection of Official Committee of Unsecured Tort Claimant Creditors to Entry of Final Order in Connection with 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 and Final 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 (REDACTED) [Docket No. 817 - filed September 22, 2017]
- K. Informal Comments from the U.S. Trustee
- L. Debtors' Omnibus Reply in Support of Motion to Approve Accommodation Agreement (SEALED) [Docket No. 866 - filed September 27, 2017]

- M. Debtors' Omnibus Reply in Support of Motion to Approve Accommodation Agreement (REDACTED) [Docket No. 867 - filed September 27, 2017]
- N. Declaration of Kirk Morris in Support of Debtors' Motion to Enter into Accommodation Agreement with Certain Customers (SEALED) [Docket No. 869 - filed September 27, 2017]
- O. Declaration of Kirk Morris in Support of Debtors' Motion to Enter into Accommodation Agreement with Certain Customers (REDACTED) [Docket No. 870 - filed September 27, 2017]
- P. Declaration of Amanda R. Steele in Support of Debtors' Omnibus Reply in Support of Motion to Approve Accommodation Agreement (SEALED) [Docket No. 871 - filed September 27, 2017]
- Q. Declaration of Amanda R. Steele in Support of Debtors' Omnibus Reply in Support of Motion to Approve Accommodation Agreement (REDACTED) [Docket No. 872 - filed September 27, 2017]

Related Documents:

- i. Notice of Filing of Exhibit B to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, 506 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for Entry of an Interim and Final 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. 87 - filed June 26, 2017]
- ii. Notice of Filing of Budget in Connection with the Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, 506 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for Entry of an Interim and Final 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. 88 - filed June 26, 2017]
- iii. Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, 506 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 Granting Motion for Entry of an Interim and Final 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. 107 - entered June 27, 2017]

- iv. Notice of Entry of (A) Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, 506 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 Granting Motion for Entry of an Interim and Final 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 and (B) Final Hearing Thereon [Docket No. 135 - filed June 28, 2017]
- v. Notice of Filing of Modified Accommodation Agreement [Docket No. 289 - filed July 20, 2017]
- vi. Notice of Filing of Limited Waiver with Respect to Accommodation Agreement [Docket No. 303 - filed July 25, 2017]
- vii. Notice of Filing First Amendment to Accommodation Agreement [Docket No. 355 - filed August 1, 2017]
- viii. Notice of Continued Hearing Regarding Final 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 and Final 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. 487 - filed August 10, 2017]
- ix. Notice of Filing of Second Limited Waiver with Respect to Accommodation Agreement [Docket No. 535 - filed August 17, 2017]
- x. Notice of Filing of Third Limited Waiver with Respect to Accommodation Agreement [Docket No. 661 - filed August 31, 2017]
- xi. Notice of Filing of Fourth Limited Waiver with Respect to Accommodation Agreement [Docket No. 732 - filed September 12, 2017]
- xii. Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 818 - filed September 22, 2017] (*Document located under tab 2.*)
- xiii. Motion to Shorten Time re: Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the

Accommodation Agreement and Access Agreement [Docket No. 819 - filed September 22, 2017] (*Document located under tab 2.i.*)

- xiv. Order Granting Motion to Shorten Time re: Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 843 - entered September 25, 2017] (*Document located under tab 2.ii.*)
- xv. Notice of Hearing on Motion for Entry of Order Authorizing Official Committee of Unsecured Tort Claimant Creditors to File Under Seal Its Supplemental Objection to the Debtors' Motion to Approve the Accommodation Agreement and Access Agreement [Docket No. 851 - filed September 26, 2017] (*Document located under tab 2.iii.*)
- xvi. Notice of Filing of Final Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503, and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 (I) Authorizing Debtors to Enter Into Accommodation Agreement and Access Agreement with Certain Customers; (II) Granting Adequate Protection in Connection Therewith; and (III) Modifying the Automatic Stay to Implement and Effectuate the Terms Thereof [Docket No. 857 - filed September 26, 2017]
- xvii. Motion of Debtors for Entry of an Order Authorizing Debtors to File Under Seal (I) Debtors' Omnibus Reply in Support of Motion to Approve Accommodation Agreement, (II) Morris Declaration, and (III) Steele Declaration [Docket No. 873 - filed September 27, 2017]
- xviii. **Motion of the OEM Customer Group for Leave to File a Late Omnibus Reply to the Objections to the Debtors' Motion for Interim and Final Orders (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 (REDACTED) [Docket No. 876 - filed September 28, 2017]**
- xix. **Motion of the OEM Customer Group for Entry of an Order Pursuant to 11 U.S.C. §§ 102(1) and 105 Shortening Notice Regarding Motion of the OEM Customer Group for Leave to File a Late Omnibus Reply to the Objections to the Debtors' Motion for Interim and Final Orders (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. 877 - filed September 28, 2017]**

- xx. **Motion of the OEM Customer Group for Leave to File a Late Omnibus Reply to the Objections to the Debtors' Motion for Interim and Final Orders (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 (SEALED) [Docket No. 880 - filed September 28, 2017]**
- xxi. **Motion of the OEM Customer Group for Entry of an Order Authorizing the OEM Customer Group to File under Seal the Omnibus Reply to the Objections to the Debtors' Motion for Interim and Final Orders (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. 881 - filed September 28, 2017]**

Status: The hearing on this matter is going forward.

- 4. 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 U.S. Trustee, the UCC, the Tort Committee, and the MDL 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 Inflater 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 Inflater 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 Future Claimants' Representative
- I. Reply of the OEM Customer Group 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 [Docket No. 704 - filed September 6, 2017]
- J. Debtors' Omnibus Reply in Support of Bar Date Motion [Docket No. 717 - filed September 8, 2017]

- K. Declaration of Shai Y. Waisman in Support of Debtors' Motion 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. 719 - filed September 8, 2017]
- L. Declaration of Jim Messina in Support of Supplemental Notice Plan to Provide Notice of Bar Dates and Other Important Deadlines and Information to Potential PSAN Inflater Claimants and Other Unknown Claimants [Docket No. 720 - filed September 8, 2017]
- M. Declaration of Thomas Vasquez in Support of Debtors' Motion 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. 721 - filed September 8, 2017]

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]
- ii. Motion of Debtors for Leave to File and Serve Reply in Support of Bar Date Motion [Docket No. 718 - filed September 8, 2017]
- iii. Order Granting Motion of Debtors for Leave to File and Serve Reply in Support of Bar Date Motion [Docket No. 743 - entered September 13, 2017]
- iv. Notice of Filing of Order Pursuant to 11 U.S.C. §§ 105(a) and 502(b)(9), 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 Expend Certain Amounts in Furtherance of Noticing Procedures [Docket No. 770 - filed September 15, 2017]
- v. Order Pursuant to 11 U.S.C. §§ 105(a) and 502(b)(9), 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 Expend Certain Amounts in Furtherance of Noticing Procedures [Docket No. 782 - entered September 18, 2017]

Status: On September 18, 2017, the Court entered an order authorizing the Debtors to expend certain amounts in connection with preparing to mail the PPIC Combined Notices. The hearing on the balance of the relief requested in the Motion is going forward.

5. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363, and 503 for Authority to Contribute to Retainer of the Special Master Appointed Pursuant to the DOJ Plea Agreement [Docket No. 563 - filed August 23, 2017]

Objection / Response Deadline: September 6, 2017 at 4:00 p.m. (EDT); extended to September 11, 2017 at 4:00 p.m. (EDT) for the UCC further extended to September 13, 2017 at 4:00 p.m. (EDT) for the UCC

Objections / Responses Received:

- A. Objection by the Official Committee of Unsecured Creditors to Debtors' Motion Seeking to Contribute to the Special Master Retainer [Docket No. 744 - filed September 13, 2017]
- B. Joinder of the Official Committee of Unsecured Tort Claimant Creditors to the Trade Committee's Objection to Debtors' Motion Seeking to Contribute to the Special Master Retainer [Docket No. 763 - filed September 15, 2017]
- C. Reply of Debtors to Objections to Debtors' Motions for Authority to Contribute to the Special Master's Retainer and Pay the Fees and Expenses of the Special Master Appointed Pursuant to the DOJ Plea Agreement [Docket No. 864 - filed September 27, 2017]

Related Documents: None.

Status: The hearing on this matter is going forward.

6. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363 and 503 for Authority to Pay the Fees and Expenses of the Special Master Appointed Pursuant to the DOJ Plea Agreement [Docket No. 749 - filed September 13, 2017]

Objection / Response Deadline: September 25, 2017 at 4:00 p.m. (EDT)

Objections / Responses Received:

- A. Objection of the Future Claimants' Representative to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363 and 503 for Authority to Pay the Fees and Expenses of the Special Master Appointed Pursuant to the DOJ Plea Agreement [Docket No. 842 - filed September 25, 2017]

- B. Objection of the Official Committee of Unsecured Tort Claimant Creditors to Debtors' Motion Seeking to Pay the Fees and Expenses of the Special Master [Docket No. 846 - filed September 25, 2017]
- C. Objection by the Official Committee of Unsecured Creditors to the Debtors' Motion Seeking to Pay the Fees and Expenses of the Special Master [Docket No. 847 - filed September 25, 2017]
- D. Joinder of the Government of the U.S. Virgin Islands and the State of Hawai'i in Objections by Official Committees to Debtors' Motion to Approve Payment of Fees and Expenses to Special Master [Docket No. 848 - filed September 25, 2017]
- E. Reply of Debtors to Objections to Debtors' Motions for Authority to Contribute to the Special Master's Retainer and Pay the Fees and Expenses of the Special Master Appointed Pursuant to the DOJ Plea Agreement [Docket No. 864 - filed September 27, 2017] (*Document located under tab 5.C.*)
- F. Joinder of the Motley Rice Federal and State Personal Injury Claimants and the Personal Injury Creditors Represented by Morgan & Morgan, P.A. in the Objection of the Official Committee of Tort Claimant Creditors to Debtors' Motion to Approve Payment of Fees and Expenses to Special Master [Docket No. 865 - filed September 27, 2017]

Related Documents: None.

Status: The hearing on this matter is going forward.

Dated: September 29, 2017
Wilmington, Delaware

/s/ Amanda R. Steele

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)

Michael J. Merchant (No. 3854)

Amanda R. Steele (No. 5530)

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