

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 : **Jointly Administered**
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**NOTICE OF *THIRD AMENDED*² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FEBRUARY 16, 2018 AT 10:00 A.M. (EST)³**

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.

THE HEARING WILL COMMENCE AT 10:00 A.M. (EASTERN TIME).

I. WITHDRAWN MATTER:

1. Motion of the Motley Rice Federal and State Personal Injury Claimants, the Personal Injury Creditors Represented by Morgan & Morgan, P.A., Shonda McCall, Individually, and as Parent and Natural Guardian to J.G.P., and Anthony De Rosas for Entry of an Order (I) Clarifying the Claims Bar Date Order and (II) Extending Claims Bar Dates [Docket No. 1248 - filed November 27, 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, **5th Floor, Courtroom 5**, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the February 16, 2018 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (EST) on Thursday, February 15, 2018 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

Objection / Response Deadline: December 15, 2017 at 4:00 p.m. (EST);
extended for the Debtors to January 13,
2018 at 4:00 p.m. (EST)

Objections / Responses Received: None.

Related Documents:

- i. Notice of Withdrawal of Motion [Docket No. 1807 - filed January 24, 2018]

Status: On January 24, 2018, the Movants withdrew this motion. Accordingly, a hearing on this matter is not necessary.

II. RESOLVED MATTER:

2. Motion of Debtors for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of the Indemnity Agreement, Attached as Exhibit 2 to the Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1402 - filed December 19, 2017]

Objection / Response Deadline: December 27, 2017 at 4:00 p.m. (EST)

Objections / Responses Received:

- A. United States Trustee's Omnibus Objection to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of TK Holdings Inc., and its Affiliated Debtors and Objection to the Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 502, 1125 and 1128, Fed. R. Bankr. P. 2002, 3003, 3016, 3017, 3018, 3020, and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 for Entry of an Order (I) Approving the Proposed Disclosure Statement and the Form and Manner of Noticing a Hearing Thereon, (II) Establishing Solicitation and Voting Procedures, and (III) Establishing Notice and Objection Procedures for Confirmation of the Debtors' Plan, and Objection to Motion of Debtors for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of the Indemnity Agreement Attached as Exhibit 2 to the Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and its Affiliated Debtors [Docket No. 1477 - filed December 27, 2017]
- B. Response of the OEM Customer Group in Support of (I) Debtors' Motion for Order Approving Proposed Disclosure Statement and Granting Related Relief and (II) Debtors' Motion to Seal Portions of the Indemnity Agreement [Docket No. 1545 - filed January 2, 2018]

- C. Debtors' Omnibus Reply in Support of Motion to Approve Disclosure Statement and Related Solicitation Procedures [Docket No. 1548 - filed January 2, 2018]

Related Documents:

- i. Notice of Filing Sealed Copy of Indemnity and Release Agreement Attached as Exhibit 2 to the Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1403 - filed December 19, 2017]
- ii. Second Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1550 - filed January 2, 2018]
- iii. Notice of Adjournment of Hearing on Motion of Debtors for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of the Indemnity Agreement, Attached as Exhibit 2 to the Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1627 - filed January 4, 2018]

Status: The parties have reached a resolution regarding this matter. Accordingly, a hearing on this matter is not necessary at this time.

III. MATTERS WITH CERTIFICATIONS OF COUNSEL:

3. Motion of Brett Andrew Thompson for Temporary Allowance of Claim for Voting Purposes Pursuant to Fed. R. Bankr. P. 3018(a) and ¶ 5 of the Notice of Approval of Disclosure Statement, (II) Establishment of Record Date, (III) Hearing on Confirmation of Chapter 11 Plan, (IV) Procedures for Objecting to Confirmation of the Plan, and (V) Procedures and Deadlines for Voting on the Plan [Docket No. 1834 - filed January 26, 2018]

Objection / Response Deadline: TBD

Objections / Responses Received: None.

Related Documents:

- i. Certification of Counsel Regarding Order Approving Stipulation By and Between the Debtors and Brett Andrew Thompson Temporarily Allowing Claim Solely for Voting Purposes [Docket No. 1982 - filed February 8, 2018]
- ii. Order Approving Stipulation By and Between the Debtors and Brett Andrew Thompson Temporarily Allowing Claim Solely for Voting Purposes [Docket No. 2004 - entered February 9, 2018]

Status: On February 9, 2018, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

4. Estate of Steven Mollohan's Motion for Temporary Allowance of Claims for Voting Purposes Pursuant to Bankruptcy Rule 3018 [Docket No. 1836 - filed January 26, 2018]

Objection / Response Deadline: February 6, 2018 at 4:00 p.m. (EST)

Objections / Responses Received: None.

Related Documents:

- i. Certification of Counsel Regarding Order Approving Stipulation by and between the Debtors and Estate of Steven Mollohan Temporarily Allowing Claim Solely for Voting Purposes and Acknowledging/Deeming Claim to be Timely Filed [Docket No. 1983 - filed February 8, 2018]
- ii. Order Approving Stipulation By and Between the Debtors and Estate of Steven Mollohan Temporarily Allowing Claim Solely for Voting Purposes and Acknowledging/Deeming Claim to be Timely Filed [Docket No. 2002 - entered February 9, 2018]

Status: On February 9, 2018, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

5. Motion of Alexander Herbert McClentic for Temporary Allowance of Claim for Voting Purposes Pursuant to Fed. R. Bankr. P. 3018(a) and ¶ 5 of the Notice of Approval of Disclosure Statement, (II) Establishment of Record Date, (III) Hearing on Confirmation of Chapter 11 Plan, (IV) Procedures for Objecting to Confirmation of the Plan, and (V) Procedures and Deadlines for Voting on the Plan [Docket No. 1837 - filed January 26, 2018]

Objection / Response Deadline: TBD

Objections / Responses Received: None.

Related Documents:

- i. Certification of Counsel Regarding Order Approving Stipulation By and Between the Debtors and Alexander Herbert McClentic Temporarily Allowing Claim Solely for Voting Purposes [Docket No. 1984 - filed February 8, 2018]
- ii. Order Approving Stipulation By and Between the Debtors and Alexander Herbert McClentic Temporarily Allowing Claim Solely for Voting Purposes [Docket No. 2003 - entered February 9, 2018]

Status: On February 9, 2018, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

IV. UNCONTESTED MATTER GOING FORWARD:

6. Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) for Authority to Capitalize an Intercompany Obligation Owed by One of the Mexican Debtors in Furtherance of the Global Transaction [Docket No. 1788 - filed January 23, 2018]

Objection / Response Deadline: February 6, 2018 at 4:00 p.m. (EST);
extended for the Official Committee of
Unsecured Creditors to February 8, 2018 at
5:00 p.m. (EST)

Objections / Responses Received: None.

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) for Authority to Capitalize an Intercompany Obligation Owed by One of the Mexican Debtors in Furtherance of the Global Transaction [Docket No. 2009 - filed February 9, 2018]
- ii. Order Pursuant to 11 U.S.C. §§ 363 and 105(a) Authorizing Debtors to Capitalize an Intercompany Obligation Owed by One of the Mexican Debtors in Furtherance of the Global Transaction [Docket No. 2024 - entered February 12, 2018]

Status: On February 12, 2018, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

V. CONTESTED MATTER GOING FORWARD:

7. Second Motion of Debtors Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending the Exclusive Filing Period [Docket No. 1760 - filed January 19, 2018]

Objection / Response Deadline: February 2, 2018 at 4:00 p.m. (EST)

Objections / Responses Received:

- A. Letter Response of Gregory J. Bermes re: Notice of Filing Claim Holder's Response / Comments to Confirmation of the Plan Pursuant to the Notice of Non-Voting Status and Election to Opt Out of Release(s) of Claims [Both Voluntary and Involuntary] and Claim Holder's Objection to Debtors' Second Motion of Debtors Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending the Exclusive Filing Period [Docket No. 1980 - filed February 5, 2018]

Related Documents:

- i. Debtors' Reply in Support of Their Second Motion Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending the Exclusive Filing Period [Docket No. 1986 - filed February 8, 2018]

Status: The hearing on this matter is going forward.

VI. CONFIRMATION:

8. Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1629 - filed January 5, 2018]

Cure Disputes / Response Deadline: February 6, 2018 at 4:00 p.m. (EST);
extended for certain limited parties

Cure Disputes / Responses:

- a. Notice of Filing of Objection of Raymond Leasing Corporation to Debtors' Proposed Cure Amount [Docket No. 1868 - filed January 31, 2018]
- b. Objection of Valley Fastner Group LLC to Proposed Cure Cost Sum Claim for Executory Contract [Docket No. 1894 - filed February 1, 2018]
- c. Objection of Pro's Choice Printing to Proposed Cure Objection [Docket No. 1909 - filed February 5, 2018]
- d. Objection of NBHX Trim USA Corporation to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1913 - filed February 5, 2018]
- e. Objection of Harrington Industrial Plastics LLC to Debtor's Proposed Assumption of Executory Contracts and Proposed Cure Amounts [Docket No. 1919 - filed February 6, 2018]
- f. Xin Point North America Inc.'s Limited Objection to (I) the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors and (II) the Debtors' Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1922 - filed February 6, 2018] (*Document located under tab 8.J.*)
- g. Objection to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases (filed by Quantum Plastics, LLC) [Docket No. 1923 - filed February 6, 2018]

- h. Alps Electric (North America), Inc.'s Objection to Debtor's Assumption and Assignment of Executory Contract and Proposed Cure Amount [Docket No. 1924 - filed February 6, 2018]
- i. Limited Objection and Reservation of Rights Regarding Debtors' Proposed Cure Amount as Contained in the Notice of Filing of Proposed Cure Costs of Executory Contracts and Unexpired Leases (filed by Sigma International Inc.) [Docket No. 1931 - filed February 6, 2018]
- j. Objection of ARC Automotive, Inc to Notice of Filing of Proposed Cure Costs of Executory Contracts and Unexpired Leases [Docket No. 1935 - filed February 6, 2018]
- k. Objection of Eissmann Automotive North America, Inc., Eissmann Automotive Detroit Development LLC and Eissmann Automotive Hungaria Kft. to Notice of Filing Proposed Cure Costs for Executory Contracts and Unexpired Leases and Related Objection to Confirmation of the Plan [Docket No. 1938 - filed February 6, 2018] (*Document located under tab 8.P.*)
- l. Objection of HCL America Inc. to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1940 - filed February 6, 2018]
- m. Limited Protective Objection and Reservation of Rights of XPO Logistics Worldwide, Inc. (Formerly Menlo Logistics, Inc.) to Debtors' Notices of Cure Costs [Docket No. 1941 - filed February 6, 2018]
- n. Objection to Proposed Cure Cost and Assumption of Executory Contract (filed by LMC Industries, Inc.) [Docket No. 1943 - filed February 6, 2018]
- o. Objection of Lectra USA Inc. and Lectra Systems SA de CV to Proposed Cure Cost for Assumption of Executory Contracts [Docket No. 1944 - filed February 6, 2018]
- p. Limited Objection of Mr. and Mrs. Robert C. Fisher to (I) Notice of Proposed Cure Costs [D.I. 1703], (II) Notice of Rejection of Executory Contracts and Unexpired Leases [D.I. 1860], and (III) Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [D.I. 1629] [Docket No. 1947 - filed February 6, 2018] (*Document located under tab 8.U.*)
- q. Limited Objection of Irvin Acquisition LLC and Irvin Automotive LLC, F/K/A Irvin Automotive Products, Inc. to (I) Notice of Proposed Cure Costs [D.I. 1703], (II) Notice of Filing of Amendments to Proposed Cure Costs for Executory Contracts and Unexpired Leases [D.I. 1859], (III)

Notice of Assumption of Executory Contracts and Unexpired Leases by Reorganized Takata [D.I. 1857], and (IV) Notice of Rejection of Executory Contracts and Unexpired Leases [D.I. 1860] [Docket No. 1949 - filed February 6, 2018]

- r. Objection of Automotive Coalition for Traffic Safety, Inc. to Assumption of Executory Contract and to Proposed Cure Amount [Docket No. 1951 - filed February 6, 2018]
- s. Objection of Dennemeyer & Co. LLC to Proposed Cure Amount [Docket No. 1952 - filed February 6, 2018]
- t. Limited Objection of Liberty Mutual Insurance Company to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1954 - filed February 6, 2018]
- u. Informal Response of CRG Financial LLC Regarding Desert EDM
- v. Informal Response of CRG Financial LLC Regarding Hanna Instruments USA
- w. Informal Response of CRG Financial LLC Regarding Sun Plastech Inc.
- x. Informal Response of CRG Financial LLC Regarding Signs Now of Moses Lake
- y. Informal Response of CRG Financial LLC Regarding Pepsi Cola Bottling of Pasco as Successor in Interest to Central Vending
- z. Informal Response of Danhil Containers
- aa. Informal Comments from Takata Coproration
- bb. Informal Comments from TK EMEA
- cc. Other Informal Comments from Various Parties
- dd. Objection of Comerica Bank to Assumption and Cure Amounts for Credit Card Contracts [Docket No. 1999 - filed February 9, 2018]
- ee. Limited Objection of (1) Danhil Containers, LLC and (2) Danhil de Mexico SA de CV to Notice of Filing of Cure Costs for Executory Contracts and Unexpired Leases (Docket No. 1703 in Case No. 17-111375) [Docket No. 2000 - filed February 9, 2018]

- ff. Objection of QAD Inc. to Debtors' Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2006 - filed February 9, 2018]
- gg. Limited Response of Takata Corporation to the Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2020 - filed February 12, 2018]
- hh. Notice of Withdrawal of Limited Objection of Liberty Mutual Insurance Company to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2022 - filed February 12, 2018]
- ii. Informal Comments from AT&T Inc.
- jj. Response to Debtors' Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2040 - filed February 14, 2018]
- kk. Limited Objection of AT&T to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2042 - filed February 14, 2018]
- ll. Objection of Michael O'Boyle, Thomas Messner, Don Schiemann, Shan Cong, and Alby Berman to (I) Notice of Rejection of Executory Contracts and Unexpired Leases and (II) Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2044 - filed February 14, 2018] (*Document located under tab 8.EE.*)
- mm. Notice of Withdrawal of Objection of NBHX Trim USA Corporation to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2073 - filed February 15, 2018]
- nn. **Notice of Withdrawal of Objection of Harrington Industrial Plastics LLC to Debtor's Proposed Assumption of Executory Contracts and Proposed Cure Amounts [Docket No. 2078 - filed February 15, 2018]**
- oo. **Order Granting Leave and Permission to File a Reply in Support of Confirmation of the Debtors' Fourth Amended Plan of Reorganization [Docket No. 2081 - filed February 15, 2018]**
- pp. **Amended Objection to Lectra USA Inc. and Lectra Systemes SA de CV to Proposed Cure Cost Sum Claim for Executory Contracts [Docket No. 2084 - filed February 15, 2018]**

- qq. **Notice of Withdrawal of Objection of Eissmann Automotive North America, Inc., Eissmann Automotive Detroit Development LLC and Eissmann Eissmann Automotive Hungaria KFT. to Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases and Related Objection to Confirmation of the Plan [Docket No. 2085 - filed February 15, 2018]**

Confirmation Objection / Response Deadline: February 6, 2018 at 4:00 p.m. (EST); extended for the Official Committee of Unsecured Trade Creditors, the Official Committee of Unsecured Tort Creditors, the Future Claimants Representative and for the MDL Plaintiffs to February 9, 2018

Confirmation Objections / Responses Received:

- A. Letter Objection of Donald R. Phillips, Sr. [Docket No. 1116 - filed November 7, 2017]
- B. Letter Objection of Donald R. Phillips, PE. [Docket No. 1130 - filed November 9, 2017]
- C. Letter Objection of Lisa J. Phillips [Docket No. 1143 - filed November 13, 2017]
- D. Objection to “The Plan of Sale” (filed by Marisa-Luisa Garcia-Alba) [Docket No. 1338 - filed December 11, 2017]
- E. Letter Objection of Greta Wold [Docket No. 1779 - filed January 23, 2018]
- F. Objection of Stanley Hedeen to Plan [Docket No. 1862 - filed January 31, 2018]
- G. United States Trustee’s Objection to Confirmation of the Third Amended Joint chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors (DE 1629) [Docket No. 1869 - filed January 31, 2018]
- H. Texas Commission on Environmental Quality’s Objection to Confirmation of Debtors’ Third Amended Joint Chapter 11 Plan of Reorganization [Docket No. 1918 - filed February 6, 2018]
- I. Objection of Confidential Whistleblowers A and B to Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization [Docket No. 1920 - filed February 6, 2018]

- J. Xin Point North America Inc.'s Limited Objection to (I) the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors and (II) the Debtors' Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1922 - filed February 6, 2018]
- K. United States' Objection to Confirmation [Docket No. 1929 - filed February 6, 2018]
- L. The Attorneys Information Exchange Group's Objection and Reservation of Rights Regarding the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings, Inc. and Its Affiliated Debtors [Docket No. 1930 - filed February 6, 2018]
- M. Objection and Reservation of Rights of Eric D. Green, in His Capacity as Special Master of Takata Corporation Criminal Restitution Funds, to the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1932 - filed February 6, 2018]
- N. Objection and Reservation of Rights of Certain PSAN PI/WD Claimants Regarding the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1934 - filed February 6, 2018]
- O. Limited Objection to Plan Confirmation and Reservation of Rights of Howard & Howard Attorneys PLLC [Docket No. 1937 - filed February 6, 2018]
- P. Objection of Eissmann Automotive North America, Inc., Eissmann Automotive Detroit Development LLC and Eissmann Automotive Hungaria Kft. to Notice of Filing Proposed Cure Costs for Executory Contracts and Unexpired Leases and Related Objection to Confirmation of the Plan [Docket No. 1938 - filed February 6, 2018]
- Q. Objection of Pacific Sintered Metals, Inc. to Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holding Inc. and Its Affiliated Debtors [Docket No. 1939 - filed February 6, 2018]
- R. Limited Objection of Infor (US), Inc. to Confirmation of Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1942 - filed February 6, 2018]
- S. Joinder of Confidential Whistleblower C to Objection of Confidential Whistleblowers A and B to Confirmation of the Third Amended Joint Plan of Reorganization [Docket No. 1945 - filed February 6, 2018]

- T. Objection of Mitsui Sumitomo Insurance Company, Ltd. to Confirmation of the Debtors' Third Amended Joint Chapter 11 Plan of Reorganization [Docket No. 1946 - filed February 6, 2018]
- U. Limited Objection of Mr. and Mrs. Robert C. Fisher to (I) Notice of Proposed Cure Costs [D.I. 1703], (II) Notice of Rejection of Executory Contracts and Unexpired Leases [D.I. 1860], and (III) Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [D.I. 1629] [Docket No. 1947 - filed February 6, 2018]
- V. Limited Objection of Automotive Coalition for Traffic Safety, Inc. to Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1948 - filed February 6, 2018]
- W. Objection by the States of Hawai'i and New Mexico and the Government of the U.S. Virgin Islands to Plan Confirmation [Docket No. 1950 - filed February 6, 2018]
- X. Limited Objection of Rene De Los Santos Olveda, Richard Walter Mott, Roxana Hernandez Mott, Jesus Pena, Maria Pena, Jesus Jaime Perez, Jose Alberto Perez, Olga G. Perez, Julio Grajales, Harold D. Langley, Juan Perez, Haisa Utter, Pedro Utter, Gennise Marquez, Individually And As Next Friend of Xxxxx Xxxxx, Bobby J. Mason, Sandra Perez, In Dividually and As Next Friend of Xxxxx Xxxxx, A Minor, Jesus Jaime Perez, Jose Alberto Perez, Olga G. Perez, Julio Grajales, Harold D. Langley, Nadia Navejas, Individually and as Next Friend of XXXX XXXXXX, XXX XXXXXX, Ana Torres, Gregory Torres, Homero Galindo, Argelia Galindo, Individually and as Next Friend of XXXXXXXX XXXXXXXX, Homero Galindo, Jr., San Juanita Marisela Rodriguez, Miguel Angel Almaguer, Phillip Lopez, Rolando Galindo, Teresita Hambly, Elvira Langley, and Merle Mott to Confirmation of the Third Amended Joint Chapter 11 Plan [Docket No. 1955 - filed February 6, 2018]
- Y. Objection of Denise Wilson to the Debtors' Amended Chapter 11 Plan for Objecting to Confirmation of the Plan [Docket No. 1958 - filed February 6, 2018]
- Z. Letter Response from Sudan Salaam [Docket No. 1964 - filed February 6, 2018]
- AA. Samuel M. Johnson, IV's Objection to Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings, Inc. and its Affiliated Debtors (DI 1629) [Docket No. 1965 - filed February 6, 2018]

- BB. Letter Response of Gregory J. Bermes re: Notice of Filing Claim Holder's Response / Comments to Confirmation of the Plan Pursuant to the Notice of Non-Voting Status and Election to Opt Out of Release(s) of Claims [Both Voluntary and Involuntary] and Claim Holder's Objection to Debtors' Second Motion of Debtors Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending the Exclusive Filing Period [Docket No. 1980 - filed February 5, 2018]
- CC. Amended Joint Limited Objection of the United States, Michigan Department of Environmental Quality, and Missouri Department of Natural Resources to Third Amended Joint Chapter 11 Plan of Reorganization of TK Holding, Inc. and Its Affiliated Debtors [D.I. 1629] [Docket No. 2011 - filed February 9, 2018]
- DD. Notice of the United States of America Concerning the Review of Certain Transactions by the Committee on Foreign Investment in the United States [Docket No. 2012 - filed February 9, 2018]
- EE. Objection of Michael O'Boyle, Thomas Messner, Don Schiemann, Shan Cong, and Alby Berman to (I) Notice of Rejection of Executory Contracts and Unexpired Leases and (II) Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2044 - filed February 14, 2018]
- FF. **Supplemental Objection of Confidential Whistleblowers A and B to Confirmation of the Third Amended Joint Chapter 11 Plan of Reorganization [Docket No. 2077 - filed February 15, 2018]**
- GG. **Limited Objection of Takata Corporation to the Fourth Amended Joint Chapter 11 Plan of Reorganization [Docket No. 2090 - filed February 15, 2018]**

Related Documents:

- i. Disclosure Statement for Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1630 - filed January 5, 2018]
- ii. Order Pursuant to 11 U.S.C. §§ 105, 502, 1125, 1126, and 1128, Fed. R. Bankr. P. 2002-1, 3003, 3016, 3017, 3018, 3020, and 9006, and Local Rules 2002-1, 3017-1, and 9006-1 for Entry of an Order (I) Approving the Proposed Disclosure Statement and the Form and Manner of the Notice of a Hearing Thereon, (II) Establishing Solicitation and Voting Procedures, and (III) Establishing Notice and Objection Procedures for Confirmation of the Debtors' Plan [Docket No. 1639 - entered January 5, 2018]

- iii. Notice of Filing of Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1703 - filed January 12, 2018]
- iv. Notice of Filing of Plan Supplement Pursuant to the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1789 - filed January 23, 2018]
- v. Notice of Filing of Update to Section 7 of the Disclosure Statement [Docket No. 1790 - filed January 23, 2018]
- vi. Notice of Assumption of Executory Contracts and Unexpired Lease by Reorganized Takata [Docket No. 1857 - filed January 31, 2018]
- vii. Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases to the Warehousing Entity [Docket No. 1858 - filed January 31, 2018]
- viii. Notice of Filing of Amendments to Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 1859 - filed January 31, 2018]
- ix. Notice of Rejection of Executory Contracts and Unexpired Leases [Docket No. 1860 - filed January 31, 2018]
- x. Notice of Extension of Voting Deadline to Accept or Reject Plan to February 9, 2018 at 4:00 p.m. (ET) [Docket No. 1907 - filed February 3, 2018]
- xi. Stipulation by and Between the Debtors and Valley Fastener Group LLC Withdrawing Cure Objection [Docket No. 1915 - filed February 5, 2018]
- xii. Affidavit of Publication with Respect to Bar Date Notice and Confirmation Hearing and Supplemental Bar Date Notice [Docket No. 1961 - filed February 6, 2018]
- xiii. Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Confirming the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 1962 - filed February 6, 2018]
- xiv. Notice of Further Extension of Voting Deadline to Accept or Reject Plan to February 12, 2018 at 5:00 p.m. (ET) [Docket No. 1994 - filed February 8, 2018]
- xv. Notice of Filing of Settlement Term Sheets with Creditors' Committee, Tort Claimants' Committee and Future Claims Representative Regarding Confirmation of Plan [Docket No. 2017 - filed February 10, 2018]

- xvi. Notice of Adjourned Hearing to Consider Confirmation of Plan and Further Extension of Voting Deadline [Docket No. 2018 - filed February 11, 2018]
- xvii. Notice of Filing of Second Plan Supplement Pursuant to the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2019 - filed February 11, 2018]
- xviii. Notice of Hearing to Consider Confirmation of Plan for Friday, February 16, 2018 at 10:30 a.m. [Docket No. 2025 - filed February 12, 2018]
- xix. Reply to Objection of Mitsui Sumitomo Insurance Company, Ltd. to Confirmation of the Debtors' Plan of Reorganization by the Official Committee of Unsecured Tort Claimant Creditors and Future Claims Representative [Docket No. 2037 - filed February 14, 2018]
- xx. Memorandum of Law in Support of Confirmation of the Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors and Response to Objections to Confirmation [Docket No. 2050 - filed February 14, 2018]
- xxi. Statement of Plan Sponsor in Support of Confirmation of Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2052 - filed February 14, 2018]
- xxii. Declaration of Joseph Perkins in Support of Confirmation of Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2054 - filed February 14, 2018]
- xxiii. Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2056 - filed February 14, 2018]
- xxiv. Notice of Filing of Blackline of Fourth Amended Plan [Docket No. 2057 - filed February 14, 2018]
- xxv. Debtors' Motion Pursuant to Local Rules 1001-1(c) and 3017-3 for Leave to Exceed Page Limit Requirements with Respect to Debtors' Memorandum of Law in Support of Confirmation of the Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors and Response to Objections to Confirmation [Docket No. 2058 - filed February 14, 2018]
- xxvi. Declaration of Kenneth Bowling in Support of Confirmation of Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2060 - filed February 14, 2018]

- xxvii. Declaration of Andrew Yearley in Support of the Debtors' Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2061 - filed February 14, 2018]
- xxviii. Declaration of Steven Fleming in Support of Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2062 - filed February 14, 2018]
- xxix. Declaration of Thomas Vasquez in Support of Debtors' Fourth Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2063 - filed February 14, 2018]
- xxx. Notice of Filing of Resolution Counsel Compensation Disclosure [Docket No. 2064 - filed February 14, 2018]
- xxxi. The Consenting OEMs' Reply in Support of Confirmation of the Debtors' Fourth Amended Plan of Reorganization [Docket No. 2066 - filed February 14, 2018]
- xxxii. Declaration of Roger Frankel, the Future Claimants' Representative, in Support of Confirmation of the Fourth Amended Joint Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2067 - filed February 14, 2018]
- xxxiii. The Consenting OEMs' Motion for an Order Granting Leave and Permission to File a Reply in Support of Confirmation of the Debtors' Fourth Amended Plan of Reorganization [Docket No. 2068 - filed February 14, 2018]
- xxxiv. **Declaration of Christina Pullo of Prime Clerk LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Third Amended Joint Chapter 11 Plan of Reorganization of TK Holdings Inc. and Its Affiliated Debtors [Docket No. 2089 - filed February 15, 2018]**
- xxxv. **Notice of Filing of Second Amendments to Proposed Cure Costs for Executory Contracts and Unexpired Leases [Docket No. 2091 - filed February 15, 2018]**
- xxxvi. **Notice of Amendments to Schedule of Executory Contracts and Unexpired Leases to be Rejected [Docket No. 2092 - filed February 15, 2018]**
- xxxvii. **Notice of Amendments to Schedule of Executory Contracts and Unexpired Leases to be Assumed by Reorganized Takata [Docket No. 2093 - filed February 15, 2018]**

xxxviii Notice of Amendments to Schedule of Executory Contracts and Unexpired Leases to be Assumed and Assigned to the Warehouse Entity [Docket No. 2094 - filed February 15, 2018]

Status: The confirmation hearing is going forward. The Debtors are working to resolve certain formal and informal objections to confirmation in advance of the hearing. To the extent not resolved prior to the confirmation hearing, all outstanding Cure Disputes (as defined in the Plan) will be set for a further hearing in accordance with Section 8.3(c) of the Plan (the "Cure Hearing"). The objection of Automotive Coalition for Traffic Safety, Inc. has been continued to an omnibus hearing date in March to be determined. The hearing on all other confirmation objections, to the extent not resolved, is going forward. The Debtors will provide notice of the adjourned Cure Hearing to all parties that have filed unresolved Cure Disputes.

VII. ADDITIONAL MATTER:

9. Motion of Certain Claimants Represented by Motley Rice for Temporary Allowance of Claims for Voting Purposes Pursuant to Bankruptcy Rule 3018 and to Extend Voting Deadline [Docket No. 2038 - filed February 14, 2018]

Objection / Response Deadline: At the hearing. (Requested)

Objections / Responses Received: None.

Related Documents:

- i. Motion to Shorten Notice and Limit Notice Regarding Motion of Certain Claimants Represented by Motley Rice for Temporary Allowance of Claims for Voting Purposes Pursuant to Bankruptcy Rule 3018 and to Extend Voting Deadline [Docket No. 2039 - filed February 14, 2018]

Status: This matter has been resolved. Accordingly, a hearing is no longer required.

Dated: February 16, 2018
Wilmington, Delaware

/s/ Amanda R. Steele

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