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Proposed Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
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GARRETT MOTION INC.,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
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Tax I.D. No.: 82-4873189	:	
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In re	:	
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BRH LLC,	:	Chapter 11
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Debtor.	:	Case No. ____ ()
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Tax I.D. No.: 22-2640650	:	
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In re	:	
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CALVARI LIMITED,	:	Chapter 11
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Debtor.	:	Case No. ____ ()
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Tax I.D. No.: 98-0461334	:	
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In re
FRICITION MATERIALS LLC.,
Debtor.
Tax I.D. No.: 26-3465114

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Chapter 11
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Case No. ____ ()
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In re
GARRETT ASASCO INC.,
Debtor.
Tax I.D. No.: 83-1906180

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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT BORROWING LLC,
Debtor.
Tax I.D. No.: 83-1744489

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Chapter 11
:
Case No. ____ ()
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In re
GARRETT HOLDING COMPANY SÀRL,
Debtor.
Tax I.D. No.: N/A

X
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Chapter 11
:
Case No. ____ ()
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X

In re

GARRETT LX I S.À R.L.,

Debtor.

Tax I.D. No.: N/A

-----X

Chapter 11

Case No. ____ ()

In re

GARRETT LX II S.À R.L.,

Debtor.

Tax I.D. No.: 98-1441653

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Chapter 11

Case No. ____ ()

In re

GARRETT LX III S.À R.L.,

Debtor.

Tax I.D. No.: 98-1442034

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Chapter 11

Case No. ____ ()

In re

GARRETT MOTION AUTOMOTIVE RESEARCH
MEXICO S. DE R.L. DE C.V.,

Debtor.

Tax I.D. No.: N/A

-----X

Chapter 11

Case No. ____ ()

In re :
: GARRETT MOTION AUSTRALIA PTY LIMITED, : Chapter 11
: Debtor. : Case No. ____ ()
: Tax I.D. No.: 98-1430734 :
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In re :
: GARRETT MOTION HOLDINGS INC., : Chapter 11
: Debtor. : Case No. ____ ()
: Tax I.D. No.: 83-1435624 :
:

In re :
: GARRETT MOTION HOLDINGS II INC., : Chapter 11
: Debtor. : Case No. ____ ()
: Tax I.D. No.: N/A :
:

In re :
: GARETT MOTION INTERNATIONAL SERVICES : Chapter 11
: S.R.L., : Case No. ____ ()
: Debtor. :
: Tax I.D. No.: N/A :
:

In re
GARRETT MOTION IRELAND A LIMITED,
Debtor.
Tax I.D. No.: 98-0615267

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND B LIMITED,
Debtor.
Tax I.D. No.: 98-0461335

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND C LIMITED,
Debtor.
Tax I.D. No.: 98-0461332

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND LIMITED,
Debtor.
Tax I.D. No.: 98-0571922

Chapter 11
Case No. ____ ()

In re

GARRETT MOTION ITALIA S.R.L.,

Debtor.

Tax I.D. No.: 98-0403934

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Chapter 11

Case No. ____ ()

In re

GARRETT MOTION JAPAN INC.,

Debtor.

Tax I.D. No.: N/A

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Chapter 11

Case No. ____ ()

In re

GARRETT MOTION LLC,

Debtor.

Tax I.D. No. 83-1278786

-----X

Chapter 11

Case No. ____ ()

In re

GARRETT MOTION MEXICO S.A. DE C.V.,

Debtor.

Tax I.D. No.: 98-1009403

Chapter 11

Case No. ____ ()

In re
GARRETT MOTION ROMANIA S.R.L.,
Debtor.
Tax I.D. No.: N/A

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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT MOTION SÀRL,
Debtor.
Tax I.D. No.: 98-0421277

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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT MOTION SLOVAKIA S.R.O.,
Debtor.
Tax I.D. No.: N/A

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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT MOTION SWITZERLAND HOLDINGS
SÀRL,
Debtor.
Tax I.D. No.: 98-1417081

X
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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT MOTION UK LIMITED,
Debtor.
Tax I.D. No.: N/A

X
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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT TRANSPORTATION I INC.,
Debtor.
Tax I.D. No. 82-4723195

X
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Chapter 11
:
Case No. ____ ()
:
:
:
X

In re
GARRETT TRANSPORTATION SYSTEMS LTD,
Debtor.
Tax I.D. No.: N/A

X
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Chapter 11
:
Case No. ____ ()
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X

In re
GARRETT TRANSPORTATION SYSTEMS UK II LTD ,
Debtor.
Tax I.D. No.: N/A

X
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Chapter 11
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Case No. ____ ()
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:
X

In re	:	
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GARRETT TS LTD,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: 98-1422528	:	

In re	:	
	:	
GARRETT TURBO LTD,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: N/A	:	

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER (I) DIRECTING
JOINT ADMINISTRATION OF CHAPTER 11 CASES AND
(II) WAIVING REQUIREMENTS OF SECTION 342(c)(1) OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULES 1005 AND 2002(n)**

Garrett Motion Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby submit this motion (this “Motion”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), pursuant to section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (a) directing the joint administration of the Debtors’ chapter 11 cases (the “Chapter 11 Cases”) and the consolidation thereof for procedural purposes only and (b) granting related relief. The facts and circumstances supporting this Motion are set forth in the concurrently filed *Declaration of Sean Deason in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* (the “Deason First Day Declaration”) and the *Declaration of Scott Tandberg in Support of the Debtors’*

Chapter 11 Petitions and First Day Pleadings (the “Tandberg First Day Declaration” and, together with the Deason First Day Declaration, the “First Day Declarations”). In further support of the Motion, the Debtors respectfully state as follows:

Background

1. Garrett Motion Inc. is a Delaware corporation established in 2018, with its headquarters located in Rolle, Switzerland. The Debtors design, manufacture and sell highly engineered turbocharger, electric-boosting and connected vehicle technologies.

2. On the date hereof (the “Petition Date”), each of the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. Each Debtor continues to operate its business and manage its properties as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No creditors’ committee has been appointed in these Chapter 11 Cases.

3. Additional factual background relating to the Debtors’ businesses and the commencement of these Chapter 11 Cases is set forth in detail in the First Day Declarations.

Jurisdiction

4. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are section 105(a) of the Bankruptcy Code and Bankruptcy Rule 1015(b).

Relief Requested

5. By this Motion, the Debtors request entry of the Order, substantially in the form attached hereto as Exhibit A, directing joint administration of these Chapter 11 Cases for

procedural purposes only, pursuant to section 105(a) of the Bankruptcy Code and rule 1015(b) of the Bankruptcy Rules.

6. Specifically, the Debtors respectfully request that the Court maintain one file and one docket for all of these Chapter 11 Cases under the case of Garrett Motion Inc. and that these Chapter 11 Cases be administered under a consolidated caption, as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	:	
In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , ¹	:	Case No. ____ ()
	:	
Debtors.	:	Jointly Administered
	:	
_____	x	

1 The last four digits of Garrett Motion Inc.’s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

7. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n).

8. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket in each of the Chapter 11 Cases (except that of Garrett Motion Inc.), to reflect the joint administration of these Chapter 11 Cases:

An Order has been entered in this case in accordance with rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Garrett Motion Inc. Case No. _____ (); BRH LLC Case No. _____ (); Calvari Limited Case No. _____ (); Friction Materials LLC Case No. _____ (); Garrett ASASCO Inc. Case No. _____ (); Garrett Borrowing LLC Case No. _____ ();

Garrett Holding Company Sàrl Case No. _____ (____); Garrett LX I S.à r.l. Case No. _____ (____); Garrett LX II S.à r.l. Case No. _____ (____); Garrett LX III S.à r.l. Case No. _____ (____); Garrett Motion Automotive Research Mexico S. de R.L. de C.V Case No. _____ (____); Garrett Motion Australia Pty Limited Case No. _____ (____); Garrett Motion Holdings Inc. Case No. _____ (____); Garrett Motion Holdings II Inc. Case No. _____ (____); Garrett Motion International Services S.r.l. Case No. _____ (____); Garrett Motion Ireland A Limited Case No. _____ (____); Garrett Motion Ireland B Limited Case No. _____ (____); Garrett Motion Ireland C Limited Case No. _____ (____); Garrett Motion Ireland Limited Case No. _____ (____); Garrett Motion Italia S.r.l. Case No. _____ (____); Garrett Motion Japan, Inc. Case No. _____ (____); Garrett Motion LLC Case No. _____ (____); Garrett Motion México S.A. de C.V Case No. _____ (____); Garrett Motion Romania S.r.l. Case No. _____ (____); Garrett Motion Sàrl Case No. _____ (____); Garrett Motion Slovakia s.r.o. Case No. _____ (____); Garrett Motion Switzerland Holdings Sàrl Case No. _____ (____); Garrett Motion UK A Limited Case No. _____ (____); Garrett Motion UK B Limited Case No. _____ (____); Garrett Motion UK C Limited Case No. _____ (____); Garrett Motion UK D Limited Case No. _____ (____); Garrett Motion UK Limited Case No. _____ (____); Garrett Transportation I Inc. Case No. _____ (____); Garrett Transportation Systems Ltd Case No. _____ (____); Garrett Transportation Systems UK II Ltd Case No. _____ (____); Garrett TS Ltd Case No. _____ (____); and Garrett Turbo Ltd Case No. _____ (____). The docket in the chapter 11 case of Garrett Motion Inc., Case No. _____ (____) should be consulted for all matters affecting this case.

9. The Debtors also seek authority to file their monthly operating reports required by the *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees*, issued by the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”), by consolidating the information required for each Debtor in one report that tracks and breaks out disbursements on a debtor-by-debtor basis in each monthly operating report.

Basis for Relief

10. Bankruptcy Rule 1015(b) provides that if “two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Garrett Motion Inc. is a Debtor in these Chapter 11 Cases, and the 37 Debtors are “affiliates” of each other as that term is defined in section 101(2) of the

Bankruptcy Code and as used in Bankruptcy Rule 1015(b). Thus, joint administration of the Debtors' Chapter 11 Cases is appropriate under Bankruptcy Rule 1015(b) and, accordingly, this Court has the authority to grant the relief requested herein.

11. Joint administration of these Chapter 11 Cases will promote efficiency and will ease the administrative burden on the Court and all parties-in-interest. Because the Debtors' financial affairs and business operations are closely related, many of the motions, hearings and orders in these Chapter 11 Cases will affect all of the Debtors. Joint administration will significantly reduce the volume of paper that otherwise would be filed with the Clerk of the Court, because it will avoid the preparation, replication, service and filing, as applicable, of duplicative notices, applications and orders. Joint administration will therefore render the completion of various administrative tasks less costly and will minimize the number of unnecessary delays. The relief requested by this Motion will also simplify supervision of the administrative aspects of these Chapter 11 Cases by the U.S. Trustee.

12. Section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by permitting the Court to "issue any order, process or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code]." 11 U.S.C. § 105(a). Further, joint administration of these Chapter 11 Cases will not prejudice or adversely impact the rights of the Debtors' creditors because the relief sought herein is purely procedural and is not intended to affect substantive rights. Each creditor may still file a claim against individual estates, as applicable. Moreover, all creditors will benefit from the reduced costs that will result from the joint administration of these Chapter 11 Cases.

13. For these reasons, the Debtors submit that the relief requested herein is in the best interest of the estates and will reduce administrative burdens on the Court and all parties-

in-interest, and therefore should be granted. Joint administration of interrelated chapter 11 cases is routinely approved by courts in this jurisdiction. *See, e.g., In re LSC Communications, Inc.*, 20-10950 (SHL) (Apr. 15, 2020), D.I. 33 (approving joint administration and permitting debtors to file their monthly operating reports required by the Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees by consolidating the information in one report that tracks and breaks out all of the specific information on a debtor-by-debtor basis); *In re Fairway Grp. Holdings Corp.*, 20-10161 (JLG) (Jan. 27, 2020), D.I. 68 (same); *In re Deluxe Entm't Servs. Grp. Inc.*, 19-23774 (RDD) (Oct. 11, 2019), D.I. 3 (same); *In re Stearns Holdings, LLC*, 19-12226 (SCC) (July 10, 2019), D.I. 3 (same); *In re Windstream Holdings, Inc.* 19-22312 (RDD) (Feb. 28, 2019), D.I. 56 (same).

Notice

14. No creditors' committee has been appointed in these Chapter 11 Cases. Notice of this Motion has been provided to: (a) the U.S. Trustee; (b) counsel to Citibank, N.A., as administrative agent under the DIP credit facility, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attn: Ray C. Schrock, P.C. (ray.schrock@weil.com) and Candace M. Arthur, Esq. (candace.arthur@weil.com); (c) counsel to JPMorgan Chase Bank, N.A., as administrative agent under the Debtors' prepetition credit facility, Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, NY 10038, Attn: Kristopher M. Hansen (khansen@stroock.com), Jonathan D. Canfield (jcanfield@stroock.com), Joanne Lau (jlau@stroock.com) and Alexander A. Fraser (afraser@stroock.com); (d) counsel to the ad hoc group of lenders under the Debtors' prepetition credit facility, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166, Attn: Scott J. Greenberg (sgreenberg@gibsondunn.com), Steven A. Domanowski (sdomanowski@gibsondunn.com) and

Matthew G. Bouslog (mbouslog@gibsondunn.com); (e) counsel to the Stalking Horse Bidder, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attn: Brian M. Resnick (brian.resnick@davispolk.com) and Joshua Y. Sturm (joshua.sturm@davispolk.com); (f) counsel to the ad hoc group of bondholders, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Matthew M. Roose (matthew.roose@ropesgray.com) and Mark I. Bane (mark.bane@ropesgray.com); (g) the parties identified on the Debtors' consolidated list of 30 largest unsecured creditors; and (h) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

15. No prior motion for the relief requested herein has been made to this or any other Court.

Conclusion

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Order, substantially in the form attached hereto as Exhibit A and (b) grant such other and further relief as is just and proper.

Dated: September 20, 2020
New York, New York

/s/ Andrew G. Dietderich
Andrew G. Dietderich
Brian D. Glueckstein
Benjamin S. Beller
Noam R. Weiss
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
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E-mail: dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
bellerb@sullcrom.com
weissn@sullcrom.com

Proposed Counsel to the Debtors

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	
	:	
GARRETT MOTION INC.,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: 82-4873189	:	

In re	:	
	:	
BRH LLC,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: 22-2640650	:	

In re	:	
	:	
CALVARI LIMITED,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: 98-0461334	:	

In re	:	
	:	
FRICITION MATERIALS LLC.,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
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Tax I.D. No.: 26-3465114	:	

In re
 GARRETT ASASCO INC.,
 Debtor.
 Tax I.D. No.: 83-1906180

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 : Chapter 11
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 : Case No. ____ ()
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 X

In re
 GARRETT BORROWING LLC,
 Debtor.
 Tax I.D. No.: 83-1744489

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 : Chapter 11
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 : Case No. ____ ()
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In re
 GARRETT HOLDING COMPANY SÀRL,
 Debtor.
 Tax I.D. No.: N/A

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 : Chapter 11
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 : Case No. ____ ()
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In re
 GARRETT LX I S.À R.L.,
 Debtor.
 Tax I.D. No.: N/A

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 : Chapter 11
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 : Case No. ____ ()
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In re

GARRETT LX II S.À R.L.,

Debtor.

Tax I.D. No.: 98-1441653

Chapter 11

Case No. ____ ()

_____X

In re

GARRETT LX III S.À R.L.,

Debtor.

Tax I.D. No.: 98-1442034

Chapter 11

Case No. ____ ()

_____X

In re

GARRETT MOTION AUTOMOTIVE RESEARCH
MEXICO S. DE R.L. DE C.V.,

Debtor.

Tax I.D. No.: N/A

Chapter 11

Case No. ____ ()

_____X

In re :
 :
 GARRETT MOTION AUSTRALIA PTY LIMITED, : Chapter 11
 :
 Debtor. : Case No. ____ ()
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 Tax I.D. No.: 98-1430734 :
 :

In re :
 :
 GARRETT MOTION HOLDINGS INC., : Chapter 11
 :
 Debtor. : Case No. ____ ()
 :
 Tax I.D. No.: 83-1435624 :
 :

In re :
 :
 GARRETT MOTION HOLDINGS II INC., : Chapter 11
 :
 Debtor. : Case No. ____ ()
 :
 Tax I.D. No.: N/A :
 :

In re :
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 GARETT MOTION INTERNATIONAL SERVICES : Chapter 11
 S.R.L., :
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 Debtor. : Case No. ____ ()
 :
 Tax I.D. No.: N/A :
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In re
GARRETT MOTION IRELAND A LIMITED,
Debtor.
Tax I.D. No.: 98-0615267

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND B LIMITED,
Debtor.
Tax I.D. No.: 98-0461335

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND C LIMITED,
Debtor.
Tax I.D. No.: 98-0461332

Chapter 11
Case No. ____ ()

In re
GARRETT MOTION IRELAND LIMITED,
Debtor.
Tax I.D. No.: 98-0571922

Chapter 11
Case No. ____ ()

In re

GARRETT MOTION ITALIA S.R.L.,

Debtor.

Tax I.D. No.: 98-0403934

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Chapter 11

Case No. ____ ()

In re

GARRETT MOTION JAPAN INC.,

Debtor.

Tax I.D. No.: N/A

-----X

Chapter 11

Case No. ____ ()

In re

GARRETT MOTION LLC,

Debtor.

Tax I.D. No. 83-1278786

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Chapter 11

Case No. ____ ()

In re

GARRETT MOTION MEXICO S.A. DE C.V,

Debtor.

Tax I.D. No.: 98-1009403

Chapter 11

Case No. ____ ()

X
In re
GARRETT MOTION ROMANIA S.R.L.,
Debtor.
Tax I.D. No.: N/A

Chapter 11
Case No. ____ ()

X
In re
GARRETT MOTION SÀRL,
Debtor.
Tax I.D. No.: 98-0421277

Chapter 11
Case No. ____ ()

X
In re
GARRETT MOTION SLOVAKIA S.R.O.,
Debtor.
Tax I.D. No.: N/A

Chapter 11
Case No. ____ ()

X
In re
GARRETT MOTION SWITZERLAND HOLDINGS
SÀRL,
Debtor.
Tax I.D. No.: 98-1417081

Chapter 11
Case No. ____ ()

_____X

In re
GARRETT MOTION UK LIMITED,
Debtor.
Tax I.D. No.: N/A

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Chapter 11
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Case No. ____ ()
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In re
GARRETT TRANSPORTATION I INC.,
Debtor.
Tax I.D. No. 82-4723195

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Chapter 11
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Case No. ____ ()
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X

In re
GARRETT TRANSPORTATION SYSTEMS LTD,
Debtor.
Tax I.D. No.: N/A

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Chapter 11
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Case No. ____ ()
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In re
GARRETT TRANSPORTATION SYSTEMS UK II LTD ,
Debtor.
Tax I.D. No.: N/A

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Chapter 11
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Case No. ____ ()
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In re	:	
	:	
GARRETT TS LTD,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: 98-1422528	:	

In re	:	
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GARRETT TURBO LTD,	:	Chapter 11
	:	
Debtor.	:	Case No. ____ ()
	:	
Tax I.D. No.: N/A	:	

ORDER DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES

Upon the motion (the “Motion”)¹ of Garrett Motion Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”), pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 1015(b) (a) directing the joint administration of these Chapter 11 Cases and the cases identified therein for procedural purposes only and (b) granting related relief; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules of the United States Bankruptcy

¹ Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

Court for the Southern District of New York (the “Local Rules”), and that, except as otherwise ordered herein, no other or further notice is necessary; and any objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. These Chapter 11 Cases shall be jointly administered pursuant to Bankruptcy Rule 1015(b) and consolidated for procedural purposes only.
3. The Clerk of the Court shall maintain one file and one docket for these Chapter 11 Cases, which file and docket shall be the file and docket for the Chapter 11 Case of Garrett Motion Inc., Case No. __-____ (___).
4. All pleadings filed in these Chapter 11 Cases shall bear a consolidated caption in the following form:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , ¹	:	Case No. ____ ()
	:	
Debtors.	:	Jointly Administered
	:	
<hr/>		X

1 The last four digits of Garrett Motion Inc.’s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

5. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

6. The Clerk of the Court shall make a docket entry in each of the Chapter 11 Cases (except that of Garrett Motion Inc.) to reflect the joint administration of these Chapter 11 Cases, substantially as follows:

An Order has been entered in this case in accordance with rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Garrett Motion Inc. Case No. ____ (); BRH LLC Case No. ____ (); Calvari Limited Case No. ____ (); Friction Materials LLC Case No. ____ (); Garrett ASASCO Inc. Case No. ____ (); Garrett Borrowing LLC Case No. ____ (); Garrett Holding Company Sarl Case No. ____ (); Garrett LX I S.à r.l. Case No. ____ (); Garrett LX II S.à r.l. Case No. ____ (); Garrett LX III S.à r.l. Case No. ____ (); Garrett Motion Automotive Research Mexico S. de R.L. de C.V Case No. ____ (); Garrett Motion Australia Pty Limited Case No. ____ (); Garrett Motion Holdings Inc. Case No. ____ (); Garrett Motion Holdings II Inc. Case No. ____ (); Garrett Motion International Services S.r.l. Case No. ____ (); Garrett Motion Ireland A Limited Case No. ____ (); Garrett Motion Ireland B Limited Case No. ____ (); Garrett Motion Ireland C Limited Case No. ____ (); Garrett Motion Ireland Limited Case No. ____ (); Garrett Motion Italia S.r.l. Case No. ____ (); Garrett Motion Japan, Inc. Case No. ____ (); Garrett

Motion LLC Case No. _____ (____); Garrett Motion México S.A. de C.V Case No. _____ (____); Garrett Motion Romania S.r.l. Case No. _____ (____); Garrett Motion Sàrl Case No. _____ (____); Garrett Motion Slovakia s.r.o. Case No. _____ (____); Garrett Motion Switzerland Holdings Sàrl Case No. _____ (____); Garrett Motion UK A Limited Case No. _____ (____); Garrett Motion UK B Limited Case No. _____ (____); Garrett Motion UK C Limited Case No. _____ (____); Garrett Motion UK D Limited Case No. _____ (____); Garrett Motion UK Limited Case No. _____ (____); Garrett Transportation I Inc. Case No. _____ (____); Garrett Transportation Systems Ltd Case No. _____ (____); Garrett Transportation Systems UK II Ltd Case No. _____ (____); Garrett TS Ltd Case No. _____ (____); and Garrett Turbo Ltd Case No. _____ (____). The docket in the chapter 11 case of Garrett Motion Inc., Case No. _____ (____) should be consulted for all matters affecting this case.

7. One consolidated docket, one file and one consolidated service list shall be maintained by the Debtors and kept by the Clerk of the Court with the assistance of the notice and claims agent retained by the Debtors in these Chapter 11 Cases.

8. The Debtors may file their monthly operating reports required by the *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees*, issued by the U.S. Trustee, by consolidating the information required for each debtor in one report that tracks and breaks out all of the disbursements on a debtor-by-debtor basis in each monthly operating report.

9. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 11 Cases.

10. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

11. The requirements set forth in Local Rule 9013-1(b) are satisfied.

12. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: _____
New York, New York

United States Bankruptcy Judge