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Proposed Counsel to the Debtors

**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.	:	Joint Administration Pending
	:	
	X	

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING
 THE DEBTORS TO (A) MAINTAIN A LIST OF CREDITORS
 IN LIEU OF SUBMITTING A FORMATTED MAILING MATRIX,
 (B) FILE A CONSOLIDATED LIST OF THE DEBTORS’ TOP 30 CREDITORS
 AND (C) FILE UNDER SEAL CERTAIN PERSONAL INFORMATION FOR
 INDIVIDUAL CREDITORS AND (II) ESTABLISHING PROCEDURES FOR
 NOTIFYING PARTIES OF COMMENCEMENT OF THESE CHAPTER 11 CASES**

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 sections 105, 107 and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy”

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.



Code”), rules 1007 and 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 1007-1, 5075-1 and 9018-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), (i) authorizing, but not directing, the Debtors, in their sole discretion, to (a) maintain a consolidated list of creditors (the “Creditor Matrix”) in lieu of submitting a separate matrix for each Debtor, (b) file a consolidated list of the Debtors’ top 30 unsecured creditors (the “Top 30 Creditor List”), (c) file the portions of the Creditor Matrix containing the addresses of the Debtors’ former and current employees and individual independent contractors under seal, (d) file a redacted version of the Creditor Matrix with the Debtors’ corporate mailing address in place of each former and current employee’s and individual independent contractor’s address, (e) provide the Debtors’ claims and noticing agent, Kurtzman Carson Consultants LLC (the “Claims Agent”), with the addresses and instruct the Claims Agent to serve the employees and individual independent contractors at their addresses, and (f) provide the sealed Creditor Matrix to the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”), any official committee appointed in the Debtors’ chapter 11 cases (the “Chapter 11 Cases”), and any other party upon Court order and (ii) establishing procedures for notifying parties of the commencement of these Chapter 11 Cases. 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. Concurrent with the filing of this Motion, the Debtors filed a motion with the Court pursuant to Bankruptcy Rule 1015 seeking joint administration of these Chapter 11 Cases. 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 sections 105, 107 and 521 of the Bankruptcy Code, Bankruptcy Rule 1007 and Local Rules 1007-1, 5075-1 and 9018-1.

Relief Requested

5. By this Motion, the Debtors request entry of the Order, substantially in the form attached hereto as Exhibit A, (i) authorizing, but not directing, the Debtors, in their sole discretion, to (a) maintain the Creditor Matrix in lieu of submitting a separate matrix for each Debtor, (b) file the Top 30 Creditor List, (c) file the portions of the Creditor Matrix containing

the addresses of the Debtors' former and current employees and individual independent contractors under seal, (d) file a redacted version of the Creditor Matrix with the Debtors' corporate mailing address in place of each former and current employee's and individual independent contractor's address, (e) provide the Claims Agent with the addresses and instruct the Claims Agent to serve the employees and individual independent contractors at their addresses, and (f) provide the sealed Creditor Matrix to the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any other party upon Court order and (ii) establishing procedures for notifying parties of the commencement of these Chapter 11 Cases.

Basis for Relief

I. The Court May Allow Debtors to Maintain the Creditor Matrix in Lieu of Submitting a Formatted Mailing Matrix.

6. Local Rule 1007-1(a) requires a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each creditor. Local Rule 1007-1(a). The Debtors request that the Court authorize the Debtors to maintain the Creditor Matrix in lieu of filing separate matrices for each Debtor. Permitting the Debtors to maintain a consolidated list of their creditors in electronic format only, in lieu of filing a creditor matrix, is warranted under the circumstances of these Chapter 11 Cases. Indeed, because the Debtors have over 8,700 potential creditors and other parties-in-interest, converting the Debtors' computerized information to a format compatible with the matrix requirements would be a burdensome task and would greatly increase the risk of error with respect to information on computer systems maintained by the Debtors or their agents.

7. The Debtors have simultaneously herewith filed an application seeking to retain the Claims Agent as their claims and noticing agent. If such application is granted, the Claims Agent will, among other things: (a) assist with compiling and maintaining the Creditor Matrix and (b) complete the mailing of notices to the creditors in the Creditor Matrix.

8. Accordingly, the Debtors, working with the Claims Agent, have prepared the Creditor Matrix in electronic format. To ensure that no parties-in-interest are prejudiced, the Debtors will make their Creditor Matrix available in readable electronic format to any party-in-interest who so requests (or in non-electronic format at such requesting party's sole cost and expense). The Debtors therefore submit that the preparation and maintenance of the Creditor Matrix is warranted under the facts and circumstances present in these Chapter 11 Cases.

II. The Court May Authorize the Debtors to File the Top 30 Creditor List.

9. Bankruptcy Rule 1007(d) provides that a debtor shall file "a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders." Fed. R. Bankr. P. 1007(d). Because many of the creditors are shared amongst certain of the Debtors, the Debtors request authority to file a single, consolidated Top 30 Creditor List.

10. The Debtors submit that permitting them to file the Top 30 Creditor List in lieu of filing a separate list for each debtor entity is warranted under the circumstances of these Chapter 11 Cases. The exercise of compiling separate creditor lists for each individual Debtor would consume an excessive amount of the Debtors' time and resources. Further, the Debtors believe that a single, consolidated list of the Debtors' 30 largest unsecured, non-insider creditors will aid the U.S. Trustee in its efforts to communicate with these creditors. As such, the Debtors believe that filing the Top 30 Creditor List in these Chapter 11 Cases is appropriate.

11. Courts in this district have approved relief similar to the relief requested herein. *See, e.g., In re OneWeb Global Limited*, 20-22437 (RDD) (Apr. 1, 2020), D.I. 41 (authorizing debtors "to file a consolidated list of their 30 largest unsecured creditors in lieu of each Debtor filing a list of its 20 largest unsecured creditors"); *In re Internap Technology Solutions Inc.*, 20-22393 (RDD) (Mar. 19, 2020), D.I. 45 (ordering that "[i]n lieu of submitting a separate mailing matrix for each Debtor, the Debtors shall make available a single, consolidated

Creditor Matrix of all the Debtor’s creditors in electronic form” and authorizing debtors “to file a consolidated list of the thirty (30) largest unsecured claims in these Chapter 11 cases”); *In re The McClatchy Company*, 20-10418 (MEW) (Feb. 14, 2020), D.I. 69 (authorizing debtors “to file a single Consolidated Top 30 List in lieu of each debtor filing a separate Top 20 List”).

III. The Court May Allow the Debtors to File Under Seal Certain Personal Identification Information Relating to Individual Creditors Under Section 107(c) of the Bankruptcy Code.

12. Section 107(c) of the Bankruptcy Code provides that the Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft . . . [a]ny means of identification . . . contained in paper filed, or to be filed, in a case under” the Bankruptcy Code or “[o]ther information contained in a paper” filed or to be filed in a bankruptcy case. 11 U.S.C. §§ 107(c)(1)(A)-(B). The Debtors respectfully submit that cause exists to authorize the Debtors to file the portions of the Creditor Matrix containing the Debtors’ former and current employees’ and individual independent contractors’ addresses under seal and to file a redacted version of the Creditor Matrix with the applicable Debtors’ corporate mailing address in place of each former and current employee’s and individual independent contractor’s address; *provided* that the Debtors shall provide the Claims Agent with such addresses and instruct the Claims Agent to serve the employees and individual independent contractors at their addresses and the Debtors shall provide the sealed Creditor Matrix to the U.S. Trustee, any official committee appointed in these Chapter 11 Cases and any other party upon Court order.

13. Bankruptcy judges in this district have ordered similar relief to that requested herein. *See, e.g., In re Purdue Pharma L.P.*, 19-23649 (RDD) (Sept. 24, 2019), D.I. 102 (authorizing debtor and claims agent to (1) “suppress personally identifiable information of any individual listed on or appearing in any document filed with the court or made publicly

available,” (2) “file affidavits of service without disclosing names and addresses of employees and former employees” and (3) “suppress names and address of employees and former employees of the Debtors in the Claims Registers”); *In re Hollander Sleep Prods., LLC*, 19-11608 (MEW) (June 4, 2019), D.I. 84 (authorizing debtor “to redact address information of individual creditors listed on the Creditor Matrix”); *In re Windstream Holdings, Inc.*, 19-22312 (RDD) (Mar. 5, 2019), D.I. 90 (same); *In re Trident Holding Co., LLC*, 19-10384 (SHL) (Feb. 12, 2019), D.I. 39 (authorizing debtor “to redact personal information from the public versions of their Creditor List on an interim basis” and “to use corporate addresses for individual creditors”); *In re Full Beauty Brands Holdings Corp.*, 19-22185 (RDD) (Feb. 7, 2019), D.I. 48 (authorizing debtor “to redact personally identifiable information of individual creditors listed on the Creditor Matrix”); *In re Aegean Marine Petroleum Network Inc.*, 18-13374 (MEW) (Dec. 6, 2018), D.I. 152 (authorizing debtors “to redact information in respect of individuals listed on the Creditor Matrix pursuant to 11 U.S.C. § 107(c)(1) and in compliance with the European General Data Protection Regulation”).

14. In this case, the risk of identity theft or injury to innocent employees and individual independent contractors outweighs the presumption in favor of public access to judicial records and papers, or concerns for the impairment of law enforcement or judicial efficiency. See *In re Avaya, Inc.*, No. 17-10089 (SMB), 2019 WL 1750908, at *5 (Bankr. S.D.N.Y. Mar. 28, 2019) (“If a court determines that the document at issue is a judicial record and the presumption of public access attaches, it must then balance concerns for impairing law enforcement or judicial efficiency against the privacy interests of the person resisting disclosure.”); *In re Continental Airlines*, 150 B.R. 334, 340-41 (D. Del. 1993). There is minimal, if any, benefit to the public disclosure of the Debtors’ current and former employees’ and individual independent contractors’ personal addresses in these Chapter 11 Cases. Moreover, the

Debtors will instruct the Claims Agent, as its noticing agent, to serve the employees and individual independent contractors at their personal addresses, ensuring that each employee will receive the same notices in these Chapter 11 Cases as all other creditors without the unnecessary public disclosure of his or her address. The Debtors will also make the unsealed version of the Creditor Matrix available to the U.S. Trustee, any official committed appointed in these Chapter 11 Cases and any other party upon Court order.

15. Additionally, certain of the Debtors' current and former employees and individual independent contractors are located in countries in the European Union, which closely regulates the disclosure of personal information. Specifically, the European Union General Data Protection Regulation (the "GDPR"), which applies to all European Union member countries, imposes significant constraints on the disclosure of "personally identifiable information," with severe penalties for violations. If an organization is found to be in breach of the GDPR, the organization may be fined up to the higher of €20 million or 4% of worldwide annual turnover of the preceding financial year.² See General Data Protection Regulation (EU) 2016/679, art. 83(5). In light of this concern for GDPR compliance, courts in this district and others have expressly provided relief to redact addresses of individuals who are citizens of European Union member countries. *See, e.g., In re Aegean Marine Petroleum Network Inc.*, 18-13374 (MEW) (Dec. 6, 2018), D.I. 152 (authorizing debtors "to redact information in respect of individuals listed on the Creditor Matrix pursuant to 11 U.S.C. § 107(c)(1) and in compliance with the European General Data Protection Regulation"); *In re Forever 21 Inc.*, 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019), D.I. 598 (authorizing debtors to redact "the names and home addresses of European

² While "personally identifiable information" is not defined in the GDPR, the GDPR defines "personal data" to include, among other things, "any information relating to an identified or identifiable natural person" such as location data.

Union member countries' citizens"); *In re White Star Petroleum Holdings, LLC*, 19-12521 (JDL) (Bankr. W.D. Okla. June 26, 2019), D.I. 136 (authorizing debtors "to (a) file the portions of the Creditor Matrix containing the home addresses of the Debtor's current and former employees and the GDPR Parties under seal and (b) file a redacted version of the Credit Matrix with . . . "ADDRESS ON FILE" in place of the home address of each of the GDPR Parties").

16. Accordingly, the privacy concerns at issue here outweigh the interest in public access to judicial proceedings and support authorizing the Debtors to seal the addresses of their current and former employees and individual independent contractors from the Creditor Matrix and to file a redacted version of the Creditor Matrix with the Debtors' corporate address in place of the addresses of its current and former employees and individual independent contractors.

17. In light of the foregoing, the Debtors respectfully request that the Court permit the Debtors to seal the Creditor Matrix as described herein, with unsealed copies provided only to the Court, the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, the Claims Agent and any other party upon Court order.

IV. The Court May Establish Procedures for Mailing Notices to Creditors, Including the Notice of Commencement of These Chapter 11 Cases.

18. As stated above, by separate application filed concurrently herewith, the Debtors are seeking authority to retain Kurtzman Carson Consultants LLC as Claims Agent. The Debtors propose that the Claims Agent undertake all mailings directed by the Court, the U.S. Trustee or as required by the Bankruptcy Code, including the notice of commencement of these Chapter 11 Cases, substantially in the form attached hereto as Exhibit B (the "Notice of Commencement"). The Claims Agent's assistance with mailing and preparing creditor lists and notices will ease the administrative burdens on the Court and the U.S. Trustee. With such assistance, the Debtors will also be capable of undertaking all necessary mailings.

19. In order to assist the Claims Agent with the tasks described above, the Debtors respectfully request that the Court establish the procedures outlined herein. Bankruptcy Rule 2002(a) provides, in relevant part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of . . . the meeting of creditors under § 341 or § 1104(b) of the Code.” Fed. R. Bankr. P. 2002(a)(1). Furthermore, Bankruptcy Rule 2002 provides that notice of the order for relief shall be sent by mail to all creditors and shareholders. Fed. R. Bankr. P. 2002(d), (f). The Debtors request authority for the Claims Agent to serve the Notice of Commencement by regular mail to creditors in accordance with Bankruptcy Rule 2002.

20. Bankruptcy Rule 2002(l) permits the Court to order “notice by publication if it finds that notice by mail is impracticable or that it is desirable to supplement the notice.” Fed. R. Bankr. P. 2002(l). In addition to mailing the Notice of Commencement, the Debtors propose to publish the Notice of Commencement, as soon as reasonably practicable, on the website maintained by the Claims Agent at <http://www.kccllc.net/garrettmotion>. The Debtors believe that such publication of the Notice of Commencement provides sufficient notice to persons who did not otherwise receive notice by mail.

21. These proposed procedures will ensure that the Debtors’ creditors receive prompt notice of the commencement of these Chapter 11 Cases and of the meeting of creditors. Section 105(a) of the Bankruptcy Code empowers the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a). The Debtors submit that implementing these procedures is within the Court’s equitable powers under section 105(a) of the Bankruptcy Code. The Debtors accordingly request that the Court approve the foregoing as providing sufficient notice of the commencement of these Chapter 11 Cases.

Notice

22. 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 for 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 for 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 KPS Capital Partners, LP, as 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

23. 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
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Proposed Counsel to the Debtors

EXHIBIT A

Proposed Order

**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	

ORDER (I) AUTHORIZING THE DEBTORS TO (A) MAINTAIN A LIST OF CREDITORS IN LIEU OF SUBMITTING A FORMATTED MAILING MATRIX, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' TOP 30 CREDITORS AND (C) FILE UNDER SEAL CERTAIN PERSONAL INFORMATION FOR INDIVIDUAL CREDITORS AND (II) ESTABLISHING PROCEDURES FOR NOTIFYING PARTIES OF COMMENCEMENT OF THESE CHAPTER 11 CASES

Upon the motion (the "Motion")² 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 sections 105, 107 and 521 of the Bankruptcy Code, Bankruptcy Rules 1007 and 2002 and Local Rules 1007-1, 5075-1 and 9018-1 (i) authorizing, but not directing, the Debtors, in their sole discretion, to (a) maintain a consolidated list of creditors (the "Creditor Matrix") in lieu of submitting a separate matrix for each Debtor, (b) file a consolidated list of the Debtors' top 30 unsecured creditors (the "Top 30 Creditor List"), (c) file the portions of the Creditor Matrix containing the addresses of the Debtors' former and current employees and individual independent contractors under seal, (d) file a redacted version of the Creditor Matrix with the Debtors' corporate mailing address in place of each former and current employee's and

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.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

individual independent contractor's address, (e) provide the Claims Agent with the addresses and instruct the Claims Agent to serve the employees and individual independent contractors at their addresses and (f) provide the sealed Creditor Matrix to the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any other party upon Court order and (ii) establishing procedures for notifying parties of the commencement of these Chapter 11 Cases; 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, 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. The Debtors are authorized to file the Top 30 Creditor List in lieu of each Debtor filing a list of its 20 largest unsecured creditors.

3. In lieu of submitting a formatted mailing matrix, the Debtors shall make available a single, consolidated Creditor Matrix of all of the Debtors' creditors in readable electronic format (or in non-electronic format at such requesting party's sole cost and expense) upon reasonable request by parties-in-interest.

4. The Debtors are authorized to (a) file the portions of the Creditor Matrix containing the addresses of the Debtors' current and former employees and individual contractors under seal and (b) file a redacted version of the Creditor Matrix with the Debtors' corporate mailing address in place of each former and current employee's and individual independent contractor's address.

5. The Debtors are authorized to provide the Claims Agent with the addresses of the current and former employees and individual independent contractors and instruct the Claims Agent to serve such parties at their addresses.

6. The Debtors are authorized and directed to provide the unredacted Creditor Matrix to the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any other party upon Court order. Each party receiving an unredacted copy of the Creditor Matrix shall keep such information confidential and comply with all applicable laws and regulations.

7. To the extent that any party provided with an unredacted copy of the Creditor Matrix files any responsive pleading or other pleadings related to the Motion, such party shall redact from its pleadings any confidential or identifying information.

8. The Claims Agent (upon this Court's authorization to engage Kurtzman Carson Consultants LLC as the Debtors' Claims Agent) is authorized to undertake all mailings directed by this Court, the U.S. Trustee or as required by the Bankruptcy Code, including, but

not limited to, the notice of commencement of these Chapter 11 Cases and any other correspondence that the Debtors may wish to send to creditors.

9. The Notice of Commencement and the procedures for notifying parties of the commencement of these Chapter 11 Cases are approved.

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

EXHIBIT B

Notice of Commencement

Information to identify the case:		
Debtor <u>Garrett Motion Inc.</u>	EIN: 82-4873189	
United States Bankruptcy Court for the: <u>Southern District of New York</u>	Date case filed in chapter 11	09/20/2020
Case Number: _____		

Official Form 309F1 (For Corporations or Partnerships) Notice of Chapter 11 Bankruptcy Case

02/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name	Garrett Motion Inc.			
2. All other names used in the last 8 years	Garrett Transportation Systems Inc.			
3. Address	16 La Pièce, Rolle, 1180, Switzerland			
Jointly Administered Cases				
Debtor	Other Names Used in Last 8 Years	Address	Case No.	EIN
BRH LLC		16 La Pièce, Rolle, 1180, Switzerland		22-2640650
Calvari Limited		Unit 411, Western Industrial Estate, IDA Industrial Park, Cork Road, Waterford X91 H586, Ireland		98-0461334
Friction Materials LLC		234 E. Maple Drive, Troy, MI, 48083, Oakland		26-3465114
Garret Motion Automotive Research Mexico S. de R.L. de C.V.	Elster AMCO Servicios de Mexico, S. de R.L. de C.V.	Blvd.Lazaro Cardenas 2545-A. Col. Plutarco Elias Calles C.P. 21376 Mexicali, BC Mexico		
Garrett ASASCO Inc.		47548 Halyard Drive, Plymouth, MI 48170		83-1906180
Garrett Borrowing LLC		47548 Halyard Drive, Plymouth, MI 48170		83-1744489
Garrett Holding Company Sàrl		Rue du Pommier 7, Neuchâtel, 2000, Switzerland		
Garrett LX I S.à r.l.		19 Rue de Bitbourg, Luxembourg, L-1273, Luxembourg		
Garrett LX II S.à r.l.		19 Rue de Bitbourg, Luxembourg, L-1273, Luxembourg		98-1441653
Garrett LX III S.à r.l.		19 Rue de Bitbourg, Luxembourg, L-1273, Luxembourg		98-1442034
Garrett Motion Australia Pty Limited	Normalair-Garrett Pty. Ltd.	14 Alfred Road, Unit 4, Chipping Norton, NSW, 1270, Australia		98-1430734
Garrett Motion Holdings Inc.		47548 Halyard Drive, Plymouth, MI 48170		83-1435624
Garrett Motion International Services S.R.L.	Honeywell International Services SRL	4B George Constantinescu Street, 2-4 Plot 1, Building A, 1st Floor, Bucharest, Romania		
Garrett Motion Ireland A Limited	Honeywell International Technologies Limited	Unit 411, Western Industrial Estate, IDA Industrial Park, Cork Road, Waterford X91 H586, Ireland		98-0615267
Garrett Motion Ireland B Limited	Novar Ireland Limited	Unit 411, Western Industrial Estate, IDA Industrial Park, Cork Road, Waterford X91 H586, Ireland		98-0461335
Garrett Motion Ireland C Limited	Novar Ireland Systems Limited	Unit 411, Western Industrial Estate, IDA Industrial Park, Cork Road, Waterford X91 H586, Ireland		98-0461332

For more information, see page 2 ▶

Jointly Administered Cases (continued)				
Debtor	Other Names Used in Last 8 Years	Address	Case No.	EIN
Garrett Motion Ireland Limited	Honeywell Transportation Ireland Limited	Unit 411, Western Industrial Estate, IDA Industrial Park, Cork Road, Waterford X91 H586, Ireland		98-0571922
Garrett Motion Italia S.r.l.	Honeywell Garrett Italia S.R.L.	6 Via Ancona, Atessa, Chieti, 66041, Italy		98-0403934
Garrett Motion Japan Inc.	Honeywell Japan Inc.	1-16 Kaigan 1-chome, New Pier Takeshiba South Tower Building 20F, Minato-ku, Tokyo, 105-0022, Japan		
Garrett Motion LLC		47548 Halyard Drive, Plymouth, MI 48170		83-1278786
Garrett Motion México, Sociedad Anónima de Capital Variable	Honeywell Productos Automotrices Sociedad Anónima de Capital Variable	Blvd.Lazaro Cardenas 2545 Col. Plutarco Elias Calles C.P. 21376 Mexicali, BC Mexico		98-1009403
Garrett Motion Romania S.R.L.	Honeywell Garrett SRL	244A Iuliu Maniu Boulevard, Secto 6, Bucharest, Romania		
Garrett Motion Sàrl	Honeywell Technologies Sàrl	16 La Pièce, Rolle, 1180, Switzerland		98-0421277
Garrett Motion Slovakia s.r.o.	Honeywell Turbo s.r.o.	515 Záborské, Záborské, 082 53, Slovakia		
Garrett Motion Switzerland Holdings Sàrl	New Honeywell Switzerland Holdings Sàrl	Rue du Pommier 7, Neuchâtel, 2000, Switzerland		98-1417081
Garrett Motion UK A Limited	Hymatic Aerospace Limited	Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		98-1423151
Garrett Motion UK B Limited	Hymatic Industrial Products Limited	Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		
Garrett Motion UK C Limited	The Hymatic Group Limited	Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		98-1423203
Garrett Motion UK D Limited	MESL Holdings Limited	Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		
Garrett Motion UK Limited	MESL Microwave Limited	115 George Street, 4th Floor, Edinburgh, EH2 4JN, United Kingdom		
Garrett Transportation I Inc.		47548 Halyard Drive, Plymouth, MI 48170		82-4723195
Garrett Transportation Systems Ltd		Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		
Garrett Transportation Systems UK II Ltd		Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		
Garrett TS Ltd		Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		98-1422528
Garrett Turbo Ltd		Countess Avenue, Stanley Green Retail Park Unit E7, Cheadle, SK8 6QS, United Kingdom		
Garrett Motion Holdings II Inc.		47548 Halyard Drive, Plymouth, MI 48170		

4. Debtor's attorney

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 bellerb@sullcrom.com
 weissn@sullcrom.com

Debtors' Claims and Noticing Agent

If you have questions about this notice, please contact Kurtzman Carson Consultants LLC

Contact phone: (866) 812-2297 (U.S./Canada)
 (781) 575-4050 (International)
 +800 3742 6170 (International Toll Free)
 Email: GarrettInfo@kccllc.com
 Website: http://www.kccllc.net/garrettmotion

5. Bankruptcy clerk's office

Documents in this case may be filed at this address.
 You may inspect all records filed in this case at this office or online at www.pacer.gov.

U.S. Bankruptcy Court
 Southern District of New York
 One Bowling Green
 New York, NY 10004-1408

Hours open: Monday-Friday, 8:30 a.m.-5:00 p.m.
 Contact phone: (212) 668-2870

For more information, see page 3 ▶

<p>6. Meeting of creditors The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.</p>	<p>_____ at _____ Date Time</p> <p><u>Time and Date to be determined.</u></p> <p>The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.</p>	<p>Location: U.S. Bankruptcy Court Southern District of New York One Bowling Green New York, NY 10004-1408</p>
<p>7. Proof of claim deadline Deadline for filing proof of claim: <u>Not yet set. If a deadline is set, the court will send you another notice.</u></p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> • your claim is designated as <i>disputed, contingent, or unliquidated</i>; • you file a proof of claim in a different amount; or • you receive another notice. <p>If your claim is not scheduled or if your claim is designated as <i>disputed, contingent, or unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the bankruptcy clerk's office or online at www.pacer.gov.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>		
<p>8. Exception to discharge deadline The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.</p> <p>Deadline for filing the complaint: <u>To be determined.</u></p>	
<p>9. Creditors with a foreign address</p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>	
<p>10. Filing a Chapter 11 bankruptcy case</p>	<p>Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.</p>	
<p>11. Discharge of debts</p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.</p>	