



**PLEASE TAKE FURTHER NOTICE** that the undersigned counsel will present the Motion to the Honorable Michael E. Wiles, United States Bankruptcy Court for the Southern District of New York (the “Court”) at a hearing to be held on **July 28, 2021 at 11:00 a.m. (Eastern Time)** (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (the “Objections”) to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, and shall be filed with the Court in accordance with the customary practices of the Court and General Order M-399. Objections must be filed and received no later than **July 21, 2021 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) and must be served on the following parties: (a) counsel to the Reorganized Debtors, Sullivan & Cromwell LLP, Attn: Alexa J. Kranzley (kranzleya@sullcrom.com) and (b) the Office of the United States Trustee for the Southern District of New York, Attn: Benjamin Higgins, Esq. (Benjamin.J.Higgins@ust.doj.gov).

**PLEASE TAKE FURTHER NOTICE** that only those objections that are timely filed, served and received will be considered at the Hearing. Failure to file a timely objection may result in the entry of an order granting the relief requested in the Motion without further notice. Failure to attend the Hearing in person or by counsel may result in relief being granted or denied upon default. In the event that no objection to the Motion is timely filed and served, the relief requested in the Motion may be granted without a hearing before the Court.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion may be obtained from the Court’s website, <https://ecf.nysb.uscourts.gov>, for a nominal fee, or obtained free of charge by accessing the website of the Reorganized Debtors’ claims and noticing agent, <http://www.kcellc.net/garrettmotion>.

Dated: July 9, 2021  
New York, New York

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*Counsel to the Reorganized Debtors*

Hearing Date: July 28, 2021 at 11:00 a.m. Eastern Time  
Objection Deadline: July 21, 2021 at 4:00 p.m. Eastern Time

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

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In re	:	Chapter 11
	:	
GARRETT MOTION INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 20-12212 (MEW)
	:	
Reorganized Debtors.	:	Jointly Administered
	:	
	:	
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**REORGANIZED DEBTORS’ MOTION FOR ENTRY OF AN ORDER  
(I) CONSOLIDATING THE ADMINISTRATION OF ALL OUTSTANDING  
CLAIMS AND MISCELLANEOUS MATTERS UNDER GARRETT MOTION INC.,  
(II) ENTERING A FINAL DECREE CLOSING CERTAIN CHAPTER 11  
CASES AND (III) GRANTING RELATED RELIEF**

Garrett Motion Inc. and its affiliated reorganized debtors in the above-captioned chapter 11 cases (collectively, the “Reorganized Debtors”) hereby submit this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), pursuant to sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (i) consolidating the administration of all outstanding

<sup>1</sup> 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, which are being jointly administered, a complete list of the Reorganized 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 Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Reorganized Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

proofs of claim and miscellaneous matters arising in these chapter 11 cases under Garrett Motion Inc. (Case No. 20-12212) (the “Lead Case”), (ii) entering a final decree closing all of the Fully Administered Cases (defined below), and (iii) granting certain related relief. Upon closing the Fully Administered Cases, the Lead Case will be the only remaining open chapter 11 case. In further support of the Motion, the Reorganized Debtors respectfully state as follows:

### **Background**

1. On September 20, 2020, Garrett Motion Inc. and each of its affiliated Debtors filed with the United States Bankruptcy Court for the Southern District of New York (the “Court”) a voluntary petition for relief under title 11 of the Bankruptcy Code. Each Debtor managed its assets as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code through the chapter 11 cases. The Debtors’ cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and the *Order Directing Joint Administration of Related Chapter 11 Cases* [D.I. 27] entered by the Court on September 21, 2020.

2. On April 23, 2021, the Court confirmed the *Debtors’ Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 1129, Ex. A] (the “Plan”),<sup>2</sup> and on April 26, 2021, entered the *Findings of Fact, Conclusions of Law and Order Confirming the Debtors’ Amended Joint Chapter 11 Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* (the “Confirmation Order”) [D.I. 1161].

3. The Plan became effective on April 30, 2021 (the “Effective Date”). See *Notice of (I) Entry of Order Confirming the Debtors’ Amended Joint Chapter 11 Plan of Reorganization under Chapter 11 of the Bankruptcy Code and (II) Occurrence of Effective Date* [D.I. 1189].

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

**Facts Specific to the Relief Requested**

4. As of the date of this Motion, the Plan has been consummated, and the Reorganized Debtors have made substantially all distributions under the Plan, except for any distributions that may be required on account of any Outstanding Claims (as defined below).

5. Approximately 2,500 proofs of claims were filed in these chapter 11 cases. On May 26, 2021, the Reorganized Debtors filed the first set of notices of satisfied claims and interests with respect to claims and interests fully and finally satisfied as a result of postpetition payments made by the Debtors, distributions under, or treatment pursuant to, the Plan or cure costs relating to the assumption of unexpired leases and executory contracts [D.I. 1232, 1233, 1234]. On June 24, 2021, the Reorganized Debtors filed the second set of notices of satisfied claims and interests with respect to additional claims and interests that have been fully and finally satisfied [D.I. 1306, 1307, 1308]. As a result of these notices and other efforts by the Reorganized Debtors and their advisors, as of the date of this Motion, 1,800 proofs of claim have been withdrawn, satisfied or otherwise resolved. The Reorganized Debtors anticipate 120 more proofs of claim will be resolved after the response deadline passes for the second set of notices.

6. All final fee applications and requests for payment of professional fees were heard and approved by the Court at the June 30, 2021 omnibus hearing. The only currently pending matters in these chapter 11 cases are certain administrative expense requests and contracts issues that the Reorganized Debtors are attempting to resolve. In addition, the Section 510(b) Claims will need to be administered following resolution of the recently approved class claim in the pending action before the United States District Court for the Southern District of New York.<sup>3</sup>

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<sup>3</sup> All Section 510(b) Claims were filed against Garrett Motion, Inc. in the Lead Case that will remain open.

7. For administrative convenience and efficiency, and to save the Reorganized Debtors’ estates significant costs, the Reorganized Debtors request that (i) all unresolved and outstanding proofs of claim filed against the Debtors (the “Outstanding Claims”), and any future miscellaneous pleadings, matters or proceedings that may be filed or necessary in the chapter 11 cases to be closed (the “Miscellaneous Matters”), be consolidated and transferred under the Lead Case for administration and final distribution, and (ii) all other cases be closed. The following lists the cases to be closed (the “Fully Administered Cases”) and the Outstanding Claims in each:

Entity Name	Case Number	Outstanding Claims
BRH LLC	20-12213	6
Calvari Limited	20-12214	1
Friction Materials LLC	20-12215	4
Garrett ASASCO Inc.	20-12211	2
Garrett Borrowing LLC	20-12216	2
Garrett Holding Company Sàrl	20-12217	1
Garrett LX I S.à r.l.	20-12218	1
Garrett LX II S.à r.l.	20-12219	1
Garrett LX III S.à r.l.	20-12220	1
Garrett Motion Australia Pty Limited	20-12221	1
Garrett Motion Automotive Research Mexico S. de R.L. de C.V	20-12222	3
Garrett Motion Holdings II Inc.	20-12224	2
Garrett Motion Holdings Inc.	20-12223	4
Garrett Motion International Services S.R.L.	20-12225	1
Garrett Motion Ireland A Limited	20-12226	1
Garrett Motion Ireland B Limited	20-12227	1
Garrett Motion Ireland C Limited	20-12228	1
Garrett Motion Ireland Limited	20-12229	1
Garrett Motion Italia S.R.L.	20-12230	1
Garrett Motion Japan Inc.	20-12231	1
Garrett Motion LLC	20-12232	1
Garrett Motion México, Sociedad Anónima de Capital Variable	20-12233	1
Garrett Motion Romania S.R.L.	20-12234	2
Garrett Motion Sàrl	20-12235	15
Garrett Motion Slovakia s.r.o.	20-12236	3
Garrett Motion Switzerland Holdings Sàrl	20-12237	1
Garrett Motion UK A Limited	20-12238	1

Garrett Motion UK B Limited	20-12239	1
Garrett Motion UK C Limited	20-12240	1
Garrett Motion UK D Limited	20-12241	1
Garrett Motion UK Limited	20-12242	1
Garrett Transportation I Inc.	20-12243	26
Garrett Transportation System Ltd	20-12244	1
Garrett Transportation Systems UK II Ltd	20-12245	1
Garrett TS Ltd	20-12246	1
Garrett Turbo Ltd	20-12247	1

8. Twenty-five of the Fully Administered Cases only have one Outstanding Claim each. The Reorganized Debtors are reviewing and resolving or adjudicating the remaining Outstanding Claims. Aside from the Outstanding Claims, the Reorganized Debtors believe that there are no other substantive motions, contested matters or adversary proceedings to be resolved in the Fully Administered Cases.

#### **Jurisdiction**

9. 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(a) and 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022 and rule 3022-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”).

#### **Relief Requested**

10. By this Motion, the Reorganized Debtors respectfully request entry of the Order (i) consolidating administration of all Outstanding Claims and Miscellaneous Matters arising in these chapter 11 cases under the Lead Case, (ii) entering a final decree closing all of the Fully Administered Cases, and (iii) granting certain related relief.

### **Basis for Relief**

#### **I. Consolidating Outstanding Claims and Miscellaneous Matters Under the Lead Case Is Appropriate Under Sections 105(a) of the Bankruptcy Code.**

11. Section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title” and further that “no provision of this title shall be construed to preclude the court from . . . taking any action or making any determination necessary or appropriate to enforce or implement court orders or rules.” 11 U.S.C. § 105(a); *see also Adelphia Bus. Solutions, Inc. v. Abnos*, 482 F.3d 602, 609 (2d Cir. 2007) (recognizing a bankruptcy court’s broad discretion under section 105(a) to do what is necessary to meet the circumstances of a case). This broad discretion includes consolidating the administration of outstanding claims and remaining matters to one pending chapter 11 case. *See e.g., JCK Legacy Company*, Case No. 20-10418 (MEW) (Bankr. S.D.N.Y. March 18, 2021), [D.I. 1140] (authorizing the consolidation of outstanding claims and other post-effective date matters into lead case and entering a final decree closing affiliate cases); *In re Pacific Drilling S.A.*, Case No. 17-13193 (MEW) (Bankr. S.D.N.Y. July 29, 2019), [D.I. 929] (same); *In re Westinghouse Electric Company LLC*, Case No. 17-10751 (MEW) (Bankr. S.D.N.Y. September 25, 2018), [D.I. 3956] (same); *In re AMR Corporation, et al*, Case No. 11-15463 (SHL) (Bankr. S.D.N.Y. September 4, 2018), [D.I. 13034] (same).

12. For the first quarter of 2021, the Debtors paid \$250,000 in quarterly U.S. Trustee fees for Garrett Motion Inc., and \$1,629,529 for the other thirty-five Debtors based on ordinary course distributions. Most of the filed proofs of claim in the Fully Administered Cases have been resolved or withdrawn, and all substantial substantive reorganization matters in these chapter 11 cases have been resolved. The Outstanding Claims and any Miscellaneous Matters that arise can be, and should be, addressed in the Lead Case with no disruption or prejudice to any party in interest. Creditors and other stakeholders will be unaffected by the proposed

consolidation because the administration of the Outstanding Claims and any Miscellaneous Matters that arise, will be preserved and resolved in the Lead Case, and any distributions ultimately required on any allowed Outstanding Claims will be satisfied in accordance with the terms of the Plan.

## **II. Closing the Fully Administered Case is Appropriate.**

13. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the [C]ourt has discharged the trustee, the [C]ourt shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022 implements section 350 of the Bankruptcy Code and provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the [C]ourt, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

14. Although the term “fully administered” is not defined in the Bankruptcy Code or the Bankruptcy Rules, the Advisory Committee Note to Bankruptcy Rule 3022 delineates the following nonexclusive factors to be considered in determining whether an estate has been fully administered:

- (1) whether the order confirming the plan has become final;
- (2) whether deposits required by the plan have been distributed;
- (3) whether the property proposed by the plan to be transferred has been transferred;
- (4) whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- (5) whether payments under the plan have commenced, and
- (6) whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022 Advisory Committee’s Note.

15. The Advisory Committee Note further indicates that entry of a final decree “should not be delayed solely because the payments required by the plan have not been completed,” and the Court “should not keep the case open only because of the possibility that the [C]ourt’s jurisdiction may be invoked in the future.” *Id.* Moreover, a final decree “does not deprive the [C]ourt of jurisdiction to enforce or interpret its own orders and does not prevent the [C]ourt from reopening the case for cause pursuant to § 350(b) of the [Bankruptcy] Code.” *Id.*; *see also In re Atari, Inc.*, 2016 WL 1618346, at \*14 (Bankr. S.D.N.Y. 2016) (reopening chapter 11 cases to interpret and enforce release and exculpation provisions of confirmation order); *In re Emmerling*, 223 B.R. 860, 864 (B.A.P. 2d Cir. 1997) (“the decision to reopen or not is discretionary with the court, which may consider numerous factors including equitable concerns”).

16. Courts generally examine the six factors in the Advisory Committee Note in determining whether an estate has been fully administered. *See, e.g., In re Pulp Finish 1 Co.*, No. 12-13774 (SMB), 2014 WL 201482, at \*11 (Bankr. S.D.N.Y. Jan. 16, 2014) (applying Advisory Committee note factors in denying motion to reconsider order closing affiliated debtor cases); *Ericson v. IDC Servs., Inc. (In re IDC Servs., Inc.)*, No. 97 CIV. 3081, Ch. 11 Case No. 93 B 45922, 1998 WL 547085 at \*3 (S.D.N.Y. Aug. 28, 1998) (observing that in defining “fully administered” under the Bankruptcy Code “several courts rely upon the 1991 Advisory Committee Note to Bankr. Rule 3022”).

17. Courts also note that these factors to be considered are “plainly an aid or checklist that serves to insure that there is no unfinished business before the Court or in the case.” *In re Kliegl Bros. Universal Elec. Stage Lighting Co.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999); *see also In re Mold Makers, Inc.*, 124 B.R. 766, 768 (Bankr. N.D. Ill. 1990) (“[A]ll of the factors in the Committee Note need not be present . . . Indeed, the Committee Note

and the factors therein merely serve as a guide in assisting the Court in its decision to close a case.”).

18. Courts recognize that Bankruptcy Rule 3022 permits flexibility to address the facts and circumstances of a particular case. *See, e.g., In re Johnson*, 402 B.R. 851, 856 (Bankr. N.D. Ind. 2009) (observing that the “nature of [the] considerations” set forth in the Advisory Committee Note “calls for a flexible, case-by-case evaluation of a number of procedural and practical factors”); *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997) (“Rule 3022 allows the [C]ourt flexibility. It does not require that a chapter 11 case be kept open until all awarded fees and allowed claims have been paid in accordance with the confirmed plan or until the statutory fees . . . have been paid.”).

19. The Fully Administered Cases have been “fully administered” within the meaning of section 350 of the Bankruptcy Code. The Confirmation Order was entered on April 26, 2021, is final and no longer appealable, and the Plan has been substantially consummated for several months. The Debtors emerged from chapter 11 as reorganized entities, and the Reorganized Debtors are conducting business and operations in accordance with the Plan. Finally, pleadings concerning the Outstanding Claims will already be filed in the Lead Case pursuant to the Court’s joint administration order, and there are no open contested matters or adversary proceedings pending in any Fully Administered Case. There is no need for the Fully Administered Cases to remain open.

20. Closing the Fully Administered Cases will have no substantive impact on creditors or equity interest holders in these chapter 11 cases, while saving the Reorganized Debtors significant administrative costs and fees. To the extent not already paid, the Reorganized Debtors will pay all required U.S. Trustee fees due and owing for all Fully Administered Cases as soon as practicable after entry of the Order approving this Motion.

Attached as Exhibit B to the Motion is a copy of the closing report required under Local Bankruptcy Rule 3022-1. Furthermore, the entry of a final decree closing the Fully Administered Cases is without prejudice to creditors' rights or the right of the Reorganized Debtors' to petition the Court to reopen any chapter 11 case pursuant to section 350(b) of the Bankruptcy Code.

21. Courts in this district have routinely granted relief similar to the relief requested herein. *See, e.g., In re Glansaol Holdings Inc., et al.*, Case No. 18-14102 (MEW) (Bankr. S.D.N.Y. August 27, 2020), [D.I. 626] (entering final decree closing fully administered cases); *In re Empire Generating Co, LLC, et al.*, Case No. 19-23007 (RDD) (Bankr. S.D.N.Y. March 4, 2020), [D.I. 447] (same); *In re Aegerion Pharmaceuticals, Inc., et al.*, Case No. 19-11632 (MG) (Bankr. S.D.N.Y. February 27, 2020), [D.I. 436] (same); *In re Global Brokerage, Inc.*, Case No. 17-13532 (MEW) (Bankr. S.D.N.Y. August 1, 2018), [D.I. 103] (same).

#### **Notice**

22. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the Southern District of New York, Attn: Benjamin Higgins, Esq; (b) counsel to Honeywell International Inc., Kirkland & Ellis LLP, Attn: Nicole L. Greenblatt, P.C. and Mark McKane, P.C.; (c) counsel to Oaktree Capital Management, L.P. and Centerbridge Partners, L.P., as Plan Sponsors, Milbank LLP, Attn: Dennis F. Dunne, Andrew M. Leblanc and Andrew C. Harmeyer; (d) counsel to the Additional Investors, Jones Day, Attn: Anna Kordas, Bruce Bennett, Joshua M. Mester and James O. Johnston; and (e) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Reorganized 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 Reorganized 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: July 9, 2021  
New York, New York

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**EXHIBIT A**

**Proposed Order**



been provided in accordance with the Bankruptcy Rules and the Local Rules, and that no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and upon the record of 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 chapter 11 cases on the attached Exhibit A (the “Fully Administered Cases”) are closed; *provided, however*, that the Court shall retain jurisdiction as provided in Article 14 of the Plan, and entry of this Order is without prejudice to the rights of the Reorganized Debtors or any party-in-interest to seek to reopen any of the Fully Administered Cases for cause pursuant to section 350(b) of the Bankruptcy Code.
3. The Outstanding Claims and any Miscellaneous Matters shall be consolidated and transferred to the Lead Case for administration and resolution, including the making or directing of all remaining distributions or payments for Outstanding Claims and Miscellaneous Matters, all to the extent provided under the Plan. Nothing in this Order shall change the amount or nature of any distribution, or any other substantive rights, that any claim against or interest in any Debtor would have been entitled to under the Plan, the Confirmation Order, any other order of the Court, the Bankruptcy Code, the Bankruptcy Rules, or otherwise had this Order not been entered.

4. The Clerk and other relevant parties are authorized and shall take any actions necessary to update the ECF filing system and their respective records to reflect Garrett Motion Inc. as the Lead Case, including entering this Order individually on each docket of Garrett Motion Inc. (Case No. 20-12212) and the Fully Administered Cases, and marking the dockets of the Fully Administered Cases as “Closed”.

5. To the extent not already paid, the fees required to be paid to the United States Trustee under 28 U.S.C. § 1930(a) shall be paid by the Reorganized Debtors on behalf of all closed chapter 11 cases as soon as reasonably practicable after the date of entry of this Order. The Reorganized Debtors shall not be obligated to pay any fees to the United States Trustee for any Fully Administered Case for any period commencing after entry of this Order.

6. The Reorganized Debtors and the claims agent 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.

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

8. 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: July \_\_, 2021  
New York, New York

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The Honorable Michael E. Wiles  
United States Bankruptcy Judge

**EXHIBIT A**  
**FULLY ADMINISTERED CASES**

Entity Name	Chapter 11 Case Number
BRH LLC	20-12213
Calvari Limited	20-12214
Friction Materials LLC	20-12215
Garrett ASASCO Inc.	20-12211
Garrett Borrowing LLC	20-12216
Garrett Holding Company Sàrl	20-12217
Garrett LX I S.à r.l.	20-12218
Garrett LX II S.à r.l.	20-12219
Garrett LX III S.à r.l.	20-12220
Garrett Motion Australia Pty Limited	20-12221
Garrett Motion Automotive Research Mexico S. de R.L. de C.V	20-12222
Garrett Motion Holdings II Inc.	20-12224
Garrett Motion Holdings Inc.	20-12223
Garrett Motion International Services S.R.L.	20-12225
Garrett Motion Ireland A Limited	20-12226
Garrett Motion Ireland B Limited	20-12227
Garrett Motion Ireland C Limited	20-12228
Garrett Motion Ireland Limited	20-12229
Garrett Motion Italia S.R.L.	20-12230
Garrett Motion Japan Inc.	20-12231
Garrett Motion LLC	20-12232
Garrett Motion México, Sociedad Anónima de Capital Variable	20-12233
Garrett Motion Romania S.R.L.	20-12234
Garrett Motion Sàrl	20-12235
Garrett Motion Slovakia s.r.o.	20-12236
Garrett Motion Switzerland Holdings Sàrl	20-12237
Garrett Motion UK A Limited	20-12238
Garrett Motion UK B Limited	20-12239
Garrett Motion UK C Limited	20-12240
Garrett Motion UK D Limited	20-12241
Garrett Motion UK Limited	20-12242
Garrett Transportation I Inc.	20-12243
Garrett Transportation System Ltd	20-12244
Garrett Transportation Systems UK II Ltd	20-12245
Garrett TS Ltd	20-12246
Garrett Turbo Ltd	20-12247

**EXHIBIT B**

**Closing Report**



FUTURE DIVIDENDS (check if % of future dividend under plan not yet able to be determined)

INITIAL DISTRIBUTION UNDER THE PLAN COMPLETED<sup>3</sup>

\_\_\_\_\_ OTHER: (explain)

Dated: July 9, 2021  
New York, New York

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Brian D. Glueckstein  
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*Counsel to the Reorganized Debtors*

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<sup>3</sup> On or about the Effective Date, the Debtors made distributions required under the Plan.

**Schedule 1**

Entity Name	Chapter 11 Case Number
BRH LLC	20-12213
Calvari Limited	20-12214
Friction Materials LLC	20-12215
Garrett ASASCO Inc.	20-12211
Garrett Borrowing LLC	20-12216
Garrett Holding Company Sàrl	20-12217
Garrett LX I S.à r.l.	20-12218
Garrett LX II S.à r.l.	20-12219
Garrett LX III S.à r.l.	20-12220
Garrett Motion Australia Pty Limited	20-12221
Garrett Motion Automotive Research Mexico S. de R.L. de C.V	20-12222
Garrett Motion Holdings II Inc.	20-12224
Garrett Motion Holdings Inc.	20-12223
Garrett Motion International Services S.R.L.	20-12225
Garrett Motion Ireland A Limited	20-12226
Garrett Motion Ireland B Limited	20-12227
Garrett Motion Ireland C Limited	20-12228
Garrett Motion Ireland Limited	20-12229
Garrett Motion Italia S.R.L.	20-12230
Garrett Motion Japan Inc.	20-12231
Garrett Motion LLC	20-12232
Garrett Motion México, Sociedad Anónima de Capital Variable	20-12233
Garrett Motion Romania S.R.L.	20-12234
Garrett Motion Sàrl	20-12235
Garrett Motion Slovakia s.r.o.	20-12236
Garrett Motion Switzerland Holdings Sàrl	20-12237
Garrett Motion UK A Limited	20-12238
Garrett Motion UK B Limited	20-12239
Garrett Motion UK C Limited	20-12240
Garrett Motion UK D Limited	20-12241
Garrett Motion UK Limited	20-12242
Garrett Transportation I Inc.	20-12243
Garrett Transportation System Ltd	20-12244
Garrett Transportation Systems UK II Ltd	20-12245
Garrett TS Ltd	20-12246
Garrett Turbo Ltd	20-12247