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Counsel to the Reorganized 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. 20-12212 (MEW)
	:	
Reorganized Debtors.	:	Jointly Administered
_____		X

CERTIFICATE OF NO OBJECTION TO 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

1. On July 9, 2021, Garrett Motion Inc. and its affiliated reorganized debtors in the above-captioned chapter 11 cases (collectively, the “Reorganized Debtors”) filed the *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* [D.I. 1352] (the

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, 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.



“Motion”). Objections to the Motion were required to be filed and served by July 21, 2021 at 4:00 p.m. (ET) (the “Objection Deadline”).

2. The Objection Deadline has passed, and to the best of the knowledge of the undersigned counsel, no objection with respect to the Motion has been filed with the Court on the docket of these chapter 11 cases or served on counsel to the Reorganized Debtors. In accordance with rule 9075-2 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, this certificate of no objection is being filed at least forty-eight hours after expiration of the Objection Deadline.

3. Since the filing of the original proposed order attached to the Motion, the Reorganized Debtors have made certain changes to the proposed order at the request of the Office of the United States Trustee. Attached as Exhibit A is a copy of the revised proposed order reflecting these changes, and a blackline showing the changes to the proposed order from the original proposed order is attached hereto as Exhibit B.

4. The Reorganized Debtors respectfully request entry of the revised proposed order attached hereto as Exhibit A at the Court’s earliest convenience.

Dated: July 23, 2021
New York, New York

/s/ Brian D. Glueckstein
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Counsel to the Reorganized Debtors

EXHIBIT A

Revised 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. The Reorganized Debtors shall reserve sufficient funds to pay the Office of the United States Trustee the amount of any quarterly fees due pursuant to 28 U.S.C. § 1930 and any applicable interest due pursuant to 31 U.S.C. § 3717, which fees and interest, if any, shall be paid within forty days (40) days of the entry of this Order. Within thirty (30) days after the entry of this Order, the Reorganized Debtors shall provide to the United States Trustee an affidavit indicating cash disbursements for the period from July 1, 2021 to the date that the Order has been entered.

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

The Honorable Michael E. Wiles
United States Bankruptcy Judge

EXHIBIT B

Blackline

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 Reorganized Debtors shall reserve sufficient funds to pay the ~~extent not already paid, the fees required to be paid to~~ Office of the United States Trustee ~~under the amount of any quarterly fees due pursuant to~~ 28 U.S.C. § 1930(a) ~~shall be paid by~~ and any applicable interest due pursuant to 31 U.S.C. § 3717, which fees and interest, if any, shall be paid within forty days (40) days of 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~~ Within thirty (30) days after the entry of this Order, the Reorganized Debtors shall ~~not be obligated to pay any fees~~ provide to the United States Trustee an affidavit indicating cash disbursements for ~~any Fully Administered Case for any~~ the period ~~commencing after entry of this Order~~ from July 1, 2021 to the date that the Order has been entered.

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

The Honorable Michael E. Wiles

United States Bankruptcy Judge