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*Attorneys for John Deere Construction and Forestry Company*

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

In re:	)	Chapter 11
GARRET MOTION INC, <i>et al.</i> , <sup>1</sup>	)	Case No. 20-12212 (MEW)
Debtors.	)	(Jointly Administered)

**NOTICE OF WITHDRAWAL BY JOHN DEERE CONSTRUCTION AND FORESTRY COMPANY OF ITS MOTION FOR ALLOWANCE OF PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM AND LIMITED OBJECTION TO DEBTORS’ NOTICE OF SATISFIED CLAIM**

John Deere Construction and Forestry Company (“Deere”), by and through its undersigned counsel, hereby withdraws its *Motion for Allowance of Payment of Administrative Expense Claim* [Docket No. 1245] and *Limited Objection and Reservation of Rights to Debtors’ Notice of Satisfied Claims* [Docket No. 1294] pursuant to that certain *Joint Stipulation and Order by and Among Garrett motion Inc. and its Affiliated Reorganized Debtors, Deere and Company, and John Deere Construction and Forestry Company*<sup>2</sup> [Docket No. 1424], entered by this Court on August 30, 2021, which includes, among other provisions, the following: i) any and all claims arising pre-

<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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the *Joint Stipulation and Order by and Among the Debtors and Deere & Company*.



petition which inure to the benefit of Deere pursuant to the Agreements or otherwise related thereto, whether unknown, unmatured, contingent, unliquidated, shall be paid by the applicable Reorganized Debtor in the ordinary course of business once said claim becomes known, matured, fixed, noncontingent, or liquidated and ii) the Reorganized Debtors, by operation of the Confirmed Plan, have assumed all executory contracts between the Debtors and Deere, including of the Agreements and any and all purchase orders thereunder and/or relating thereto, and any claims relating thereto, whether arising pre-petition or post-petition shall be paid by the applicable Reorganized Debtor in the ordinary course of business.

Dated: September 20, 2021.

GENSBURG CALANDRIELLO & KANTER, P.C.

By: /s/ Matthew T. Gensburg

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*Attorneys for John Deere Construction and  
Forestry Company, Creditors herein.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2021, I caused a true and correct copy of the foregoing Notice of Withdrawal to be electronically served via ECF notification upon all parties requesting service.

By: /s/ Matthew T. Gensburg

Matthew T. Gensburg