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Counsel to the Reorganized Debtors

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

In re:)	Chapter 11
)	
WINDSTREAM FINANCE, CORP., <i>et al.</i> , ¹)	Case No. 19-22397 (RDD)
)	
Reorganized Debtors.)	(Formerly Jointly Administered
)	under Lead Case: Windstream
)	Holdings, Inc., Case No. 19-22312)

**CERTIFICATE OF NO OBJECTION REGARDING
 REORGANIZED DEBTORS' SECOND MOTION FOR ENTRY OF
 AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”) and in accordance with this Court’s applicable procedures set forth in the *Final Order Establishing Certain Notice, Case Management, and Administrative Procedures* (the “Case Management Order”) [Docket No. 392], the undersigned counsel for the above-captioned reorganized debtors (the “Reorganized Debtors”) hereby certifies as follows:

¹ The last four digits of the Reorganized Debtor Windstream Finance, Corp.’s tax identification number are 5713. Due to the large number of Reorganized Debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the reorganized debtor entities 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.kcellc.net/windstream>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is 4001 North Rodney Parham Road, Little Rock, Arkansas 72212.



1. On September 16, 2021, the Reorganized Debtors filed the *Reorganized Debtors' Second Motion for Entry of an Order Extending the Claims Objection Deadline* (the "Motion") [Docket No. 187] and provided service of the Motion to the relevant parties via electronic and first class mail, as evidenced by the *Certificate of Service* [Docket No. 188].

2. In accordance with the Case Management Order, responses to the Motion were due no later than September 27, 2021, at 4:00 p.m., prevailing Eastern Time (the "Objection Deadline"). Local Rule 9075-2 and the Case Management Order provide that the Motion may be granted without a hearing if (a) no objection, responsive pleadings, or requests for a hearing have been filed on or before the applicable response deadline and (b) the attorney for the entity that filed the Motion complies with such rule.

3. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline, and, to the best of my knowledge, no objection, responsive pleadings, or request for a hearing that have been (a) filed with the Court on the docket of the above-captioned chapter 11 cases (or the formerly jointly-administered docket) or (b) served on the Reorganized Debtors or their counsel remain unresolved with respect to entry of the revised proposed order attached hereto as Exhibit A (the "Order"). Changes to the Order are reflected on the blackline attached hereto as Exhibit B.

4. Accordingly, the Reorganized Debtors respectfully request entry of the Order at the Court's earliest convenience. If not entered prior to the hearing, the Reorganized Debtors will seek entry of the Order at the hearing scheduled for 10:00 a.m., prevailing Eastern Time, on Thursday, September 30, 2021, before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, at the United States

Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601.

Dated: September 29, 2021
New York, New York

/s/ Stephen E. Hessler, P.C.

Stephen E. Hessler, P.C.

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Counsel to the Reorganized Debtors

Exhibit A

Proposed Order (Revised)

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

In re:)	
)	Chapter 11
WINDSTREAM FINANCE, CORP., <i>et al.</i> , ¹)	Case No. 19-22397 (RDD)
)	
Reorganized Debtors.)	(Formerly Jointly Administered under
)	Lead Case: Windstream Holdings, Inc.,
)	Case No. 19-22312)

SECOND ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE

Upon the motion (the “Motion”)² of the Reorganized Debtors for the entry of an order (this “Order”) extending the Claims Objection Deadline under the Plan to December 15, 2021, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012, as a core proceeding pursuant to 28 U.S.C. § 157(b) that this Court may decide by a final order consistent with Article III of the United States Constitution; and this Court having found that venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Reorganized Debtors’ notice of the Motion’s request for relief and the opportunity for a hearing thereon were appropriate under the circumstances and no other notice thereof need be provided; and upon the record of the hearing held by the Court, if any, and all of the proceedings herein; and,

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

after due deliberation, this Court having determined that the legal and factual bases set forth in the Motion and at the hearing establish good and sufficient cause for the relief granted herein, therefore, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Claims Objection Deadline is extended through and including December 15, 2021.
3. Saetec, Inc.'s, the Reorganized Debtors', and the Debtors' rights are preserved, respectively, with regard to the Reorganized Debtors' or Debtors' ability to amend the Live Pleadings (as raised in Saetec, Inc.'s Limited Opposition to Reorganized Debtors' Motion for Entry of an Order Extending the Claims Objection Deadline filed at docket number 81) on grounds that the Claims Objection Deadline has been extended pursuant to this Order.
4. The requirements of Local Bankruptcy Rule 9006-2 shall be deemed satisfied.
5. Entry of this Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline.
6. Nothing in this Order or the Motion is or shall be deemed to constitute any admission as to the validity, nature, amount, or priority of any claim asserted against the Debtors in the chapter 11 cases or a waiver of any right to dispute the validity, nature, amount, or priority of or otherwise object on any grounds to any such claims.
7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
8. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
9. Notice of the Motion shall be deemed good and sufficient, and the applicable

requirements of the Bankruptcy Rules and Local Bankruptcy Rules have been satisfied.

10. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

White Plains, New York

Dated: _____, 2021

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit B

Blackline - Proposed Order

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

In re:)	
)	Chapter 11
)	
WINDSTREAM FINANCE, CORP., <i>et al.</i> , ¹)	Case No. 19-22397 (RDD)
)	
Reorganized Debtors.)	(Formerly Jointly Administered under
)	Lead Case: Windstream Holdings, Inc.,
)	Case No. 19-22312)

SECOND ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE

Upon the motion (the “Motion”)² of the Reorganized Debtors for the entry of an order (this “Order”) extending the Claims Objection Deadline under the Plan to December 15, 2021, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012, as a core proceeding pursuant to 28 U.S.C. § 157(b) that this Court may decide by a final order consistent with Article III of the United States Constitution; and this Court having found that venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Reorganized Debtors’ notice of the Motion’s request for relief and the opportunity for a hearing thereon were appropriate under the circumstances and no other notice thereof need be provided; and upon the record of the hearing held by the Court, if any, and all of

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

the proceedings herein; and, after due deliberation, this Court having determined that the legal and factual bases set forth in the Motion and at the hearing establish good and sufficient cause for the relief granted herein, therefore, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Claims Objection Deadline is extended through and including December 15, 2021.

3. Saetec, Inc.'s, the Reorganized Debtors', and the Debtors' rights are preserved, respectively, with regard to the Reorganized Debtors' or Debtors' ability to amend the Live Pleadings (as raised in Saetec, Inc.'s Limited Opposition to Reorganized Debtors' Motion for Entry of an Order Extending the Claims Objection Deadline filed at docket number 81) on grounds that the Claims Objection Deadline has been extended pursuant to this Order.

4. ~~3.~~ The requirements of Local Bankruptcy Rule 9006-2 shall be deemed satisfied.

5. ~~4.~~ Entry of this Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline.

6. ~~5.~~ Nothing in this Order or the Motion is or shall be deemed to constitute any admission as to the validity, nature, amount, or priority of any claim asserted against the Debtors in the chapter 11 cases or a waiver of any right to dispute the validity, nature, amount, or priority of or otherwise object on any grounds to any such claims.

7. ~~6.~~ The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. ~~7.~~ The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

9. ~~8.~~ Notice of the Motion shall be deemed good and sufficient, and the applicable

requirements of the Bankruptcy Rules and Local Bankruptcy Rules have been satisfied.

| 10. ~~9.~~ This Court retains jurisdiction with respect to all matters arising from or related
to the implementation of this Order.

White Plains, New York

Dated: _____, 2021

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE