

Presentment Date and Time: March 30, 2022, at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: March 25, 2022, at 4:00 p.m. (prevailing Eastern Time)

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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)

**NOTICE OF PRESENTMENT OF THE
REORGANIZED DEBTORS’ FOURTH MOTION FOR
ENTRY OF AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE**

PLEASE TAKE NOTICE that, on March 15, 2022, the above-captioned reorganized debtors filed the *Reorganized Debtors’ Fourth Motion for Entry of an Order Extending the Claims Objection Deadline* (the “Motion”). A hearing on the Motion (the “Hearing”) will be held 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

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.kccllc.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.



District of New York (the “Court”), 300 Quarropas Street, White Plains, New York 10601, on **March 30, 2022, at 10:00 a.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, at the Hearing, the Reorganized Debtors will present an order substantially in the form attached to the Motion at Exhibit A (the “Proposed Order”) to the Court for approval.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Motion (each, an “Objection”) shall (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York, and the *Final Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Docket No. 392] (the “Case Management Order”), (c) be filed electronically with the Court on the docket of *In re Windstream Finance, Corp.*, Case No. 19-22397 (RDD) by registered users of the Court’s electronic filing system and in accordance with the General Order M-399 (which is available on the Court’s website at <http://www.nysb.uscourts.gov>), (d) be sent to the Court’s chambers, and (e) be served so that the following parties actually receive such responsive pleading on or before **March 25, 2022, at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”): (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Stephen E. Hessler, P.C. and Chris Ceresa; and (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn.: Ross M. Kwasteniet, P.C. and John R. Luze.

PLEASE TAKE FURTHER NOTICE that the Reorganized Debtors are authorized to submit the Proposed Order to the Court if (a) an Objection is not filed and served timely on or

before the Objection Deadline or (b) all Objections are resolved before the Hearing. The Court may enter the Order with no further notice or opportunity to be heard under such circumstances.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time in accordance with the Case Management Order.

PLEASE TAKE FURTHER NOTICE that copies of the pleadings filed in the chapter 11 cases may be obtained free of charge on Kurtzman Carson Consultants LLC's website, <http://www.kccllc.net/windstream>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth thereon.

[Reminder of page intentionally left blank]

Dated: March 15, 2022
New York, New York

/s/ Stephen E. Hessler

Stephen E. Hessler, P.C.

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

**REORGANIZED DEBTORS’ FOURTH MOTION FOR ENTRY OF
AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE**

Windstream Finance, Corp. and its affiliates (collectively, before the Effective Date,² the “Debtors” and, thereafter, the “Reorganized Debtors”) state as follows in support of this motion:

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.kccllc.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.

² The “Effective Date” of the Plan (defined herein) occurred on September 21, 2020, as described in the *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Docket No. 2527].

Relief Requested

1. The Reorganized Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”) to grant (a) a fourth extension of the deadline by which the Reorganized Debtors may file objections to the allowance of Claims (defined herein) under Article I.A.38 of the Plan³ and, out of an abundance of caution, notices of satisfaction of Claims (defined herein) to June 13, 2022 and (b) such other relief as is just and proper.⁴

Jurisdiction and Venue

2. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012. The Reorganized Debtors confirm their consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are section 105 of title 11 of the

³ Capitalized terms used but not defined herein shall have the meaning set forth in the *Findings of Fact, Conclusions of Law, and Order Confirming the First Amended Joint Chapter 11 Plan of Reorganization of Windstream Holdings, Inc. et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2243] (the “Confirmation Order”) or Exhibit A thereto (as may be modified, supplemented, and updated from time to time, the “Plan”), as applicable.

⁴ This motion is filed prior to the expiration of the current Claims Objection Deadline, with a return date no later than fourteen (14) days from the date hereof or such date the Court permits. Accordingly, rule 9006-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”) automatically extends the Claims Objection Deadline pending the Court’s resolution of the relief requested by this Motion.

United States Code (the “Bankruptcy Code”), Bankruptcy Rule 9006, and Local Bankruptcy Rule 9006-2.

The Claims Reconciliation Process

5. As of the date hereof, the Debtors have scheduled more than 23,850 claims, totaling more than \$309.4 billion.⁵ As of the date hereof, parties have filed approximately 8,800 proofs of claim against the Debtors, totaling approximately \$16.6 billion.⁶ In sum, there were more than 32,650 claims, whether filed proofs of claim or scheduled claims, in these chapter 11 cases (collectively, the “Claims”), totaling approximately \$326 billion.

6. The Debtors and their advisors commenced a comprehensive process to reconcile each Claim with the Debtors’ books and records. The claims reconciliation process involved, among other things, (a) line-by-line reviews of invoices, agreements, and other documents related to each proof of claim and (b) innumerable telephone conferences and correspondence with claimants and their applicable counsel. As a result of this process, twenty (20) omnibus claims objections and sixteen (16) satisfaction notices have been filed to date.⁷ The Court has entered orders granting such omnibus claims objections and satisfaction notices (at least in part), other

⁵ On May 10, 2019, the Debtors filed their respective schedules of assets and liabilities and statements of financial affairs [Docket Nos. 505-06] pursuant to Bankruptcy Rule 1007 and the *Order Granting a Second Extension of Time to File Schedules and Statements of Financial Affairs* [Docket No. 387]. On January 21, 2020, the Debtors filed amendments to certain schedules. See Docket Nos. 1435-36.

⁶ On May 13, 2019, the Court entered the *Order (I) Setting Bar Dates for Submitting Proofs of Claim, (II) Approving Procedures for Submitting Proofs of Claim, and (III) Approving Notice Thereof* [Docket No. 518] establishing certain dates and deadlines for filing proofs of claim in the chapter 11 cases.

⁷ On October 10, 2019, the Court granted authority to file omnibus objections to Claims and notices of satisfaction in accordance with the terms of the *Order (I) Approving (A) Omnibus Claims Objection Procedures, (B) Omnibus Substantive Claims Objections and Form of Notice, and (C) Satisfaction Procedures and Form of Notice and (II) Waiving Bankruptcy Rule 3007(e)(6) (the “Procedures Order”)* [Docket No. 1141].

than the *Sixteenth Notice of Satisfaction of Claims* [Docket No. 185] which is pending as of the date hereof.⁸

7. Article VII.E. of the Plan provides that the Reorganized Debtors may file omnibus claims objections and satisfaction notices no later than “(a) 180 days after the Effective Date” (*i.e.*, March 22, 2021)⁹ and “(b) such later date as may be fixed by the Bankruptcy Court” (such date, the “Claims Objection Deadline”). The current Claims Objection Deadline is through and including March 15, 2022 in accordance with the Court’s entry of three (3) extension orders.¹⁰

8. The Debtors and their advisors have resolved a significant number of Claims through the claims reconciliation process, including since this Court extended the Claims Objection Deadline each time. When the initial motion for an extension of the Claims Objection Deadline was filed, of the more than 32,650 total Claims, 2,930 Claims had yet to be allowed, satisfied, withdrawn, or expunged.¹¹ When the second motion for an extension of the Claims Objection Deadline was filed, approximately sixty (60) Claims had yet to be allowed, satisfied,

⁸ The Reorganized Debtors and applicable claimants consensually resolved each claim subject to the *Reorganized Debtors’ Nineteenth Omnibus Objection to the No Liability Claims and Claims to be Modified* [Docket No. 162] after such objection was filed, so there was no need for an order of the Court to resolve such claims.

⁹ The Effective Date occurred on September 21, 2020. 180 days thereafter is March 20, 2021, which fell on a weekend. The deadline automatically extended to the first non-holiday weekday thereafter pursuant to Bankruptcy Rule 9006, which was March 22, 2021.

¹⁰ See *Order Extending the Claims Objection Deadline* [Docket No. 95] (extending the Claims Objection Deadline by 180 days through and including September 16, 2021); *Second Order Extending the Claims Objection Deadline* [Docket No. 199] (extending the Claims Objection Deadline by ninety (90) days through and including December 15, 2021); *Third Order Extending the Claims Objection Deadline* [Docket No. 217] (extending the Claims Objection Deadline by ninety (90) days through and including March 15, 2022).

¹¹ See *Reorganized Debtors’ Motion for Entry of an Order Extending the Claims Objection Deadline* [Docket No. 78], at 4-5.

withdrawn, or expunged.¹² When the third motion for an extension of the Claims Objection Deadline was filed, approximately twenty (20) Claims had yet to be allowed, satisfied, withdrawn, or expunged.¹³ As of the date hereof, the number of Claims yet to be allowed, satisfied, withdrawn, or expunged is down to approximately three (3) Claims, each of which is subject to a pending claims objection. These outstanding Claims represent less than one-tenth of one percent (0.1%) both by number and amount relative to all Claims. Nonetheless, the amount of such outstanding Claims, as filed, is more than \$533 thousand in the aggregate. Such results could not have been achieved without appropriate time allotted under the Plan and as extended.

Basis for Relief

9. Bankruptcy courts retain post-confirmation jurisdiction to the extent provided in the plan. *See In re Johns-Manville Corp.*, 7 F.3d 32, 34 (2d Cir. 1993). This Court has retained jurisdiction under the Debtors' Plan with respect to all matters arising out of or related thereto "allow[ing], disallow[ing], determin[ing], liquidat[ing], classif[ing], estimat[ing], or establish[ing] the priority, [s]ecured or unsecured status, or amount of any Claim[,] including ... the resolution of any and all objections to ... Claims."¹⁴ The Plan provides that the Court may fix a date beyond March 22, 2021 to object to claims and does not preclude more than one extension of the Claims Objection Deadline.¹⁵

¹² *Reorganized Debtors' Second Motion for Entry of an Order Extending the Claims Objection Deadline* [Docket No. 187], at 5.

¹³ *Reorganized Debtors' Third Motion for Entry of an Order Extending the Claims Objection Deadline* [Docket No. 212], at 5.

¹⁴ Plan, at Art. XI.1, XI.8; *see* Confirmation Order.

¹⁵ Plan, at Art. VII.E; *see supra* par. 7.

10. “[W]hen an act is required or allowed to be done at or within a specified period . . . by order of the court, the court for cause may at any time in its discretion . . . order the period enlarged if the request therefore is made before the expiration of the period originally prescribed . . .” Bankruptcy Rule 9006. The U.S. Supreme Court has noted that any analysis of a motion brought under Bankruptcy Rule 9006 is “at bottom an equitable one, taking account of all relevant circumstances,” including “the danger of prejudice to the debtor, the length of the delay and its potential impact on judicial proceedings, the reason for the delay, including whether it was within the reasonable control of the movant, and whether the movant acted in good faith.” *Pioneer Inv. Serv. Co. v. Brunswick Assocs. P’ship*, 507 U.S. 380, 395 (1993); *see also In re Mmahat*, No. Civ. A. 94–292, 1994 WL 160512, at *6 (E.D. La. 1994) (characterizing the Bankruptcy Rule 9006 standard as a “lenient” one). Further extensions of time to object to claims after an initial extension have been routinely granted.¹⁶

11. Given the relevant circumstances, cause exists to extend the Claims Objection Deadline an additional 90 (ninety) days, which is necessary based on the number and nature of Claims that remain outstanding, is largely consistent with prior extensions granted in other cases, and will not have a materially adverse impact on creditors or other judicial proceedings. The Debtors and Reorganized Debtors have prosecuted claims objections and filed satisfaction notices diligently and in good faith throughout these chapter 11 cases. More specifically, the Debtors and Reorganized Debtors have filed claims objections and satisfaction notices almost every month since the Procedures Order was entered in October 2019 through August 2021. To the extent

¹⁶ *See, e.g., In re Cenveo, Inc.*, Case No. 18-22178 (RDD) (Bankr. S.D.N.Y. 2018) (granting two (2) 180-day extensions of the claims objection deadline); *In re Westinghouse Elec. Co. LLC*, Case No. 17-10751 (MEW) (Bankr. S.D.N.Y. 2017) (granting two (2) 180-day extensions of claims objection deadline); *In re SunEdison, Inc.*, Case No. 16-10992-dsj (Bankr. S.D.N.Y. 2016) (granting seven (7) 180-day extensions to the claims objection deadline); *In re Drone LC, Inc.*, Case No. 17-10426-KJC (Bankr. D.Del. 2018) (granting two (2) 120-day extensions of the claims objection deadline).

claimants responded to claims objections or satisfaction notices, the Debtors and Reorganized Debtors have worked collaboratively with such claimants, including by accepting informal responses and granting extensions of the deadline to respond when appropriate. The Debtors and Reorganized Debtors have even provided internal reconciliation notes and analyses to claimants upon request, ensuring a transparent and efficient process. As a result, the Debtors and Reorganized Debtors and their advisors have not only been working tirelessly to resolve the thousands of proofs of claim but have also made significant headway.

12. Many of the Claims that were previously unresolved were outstanding in part due to either the factual and legal complexities associated therewith (including as described in papers filed in connection with certain adversary proceedings before this Court) or delays in receiving information from claimants regarding the basis for their response. The Debtors and Reorganized Debtors have not wasted any time in resolving their more complex Claims. They have engaged in robust discussions with certain claimants or developed strategies to resolve these complex Claims with their advisors. Additionally, the Reorganized Debtors had maintained regular communication with claimants that have not yet provided support for their responses to an objection or notice of satisfaction. The Reorganized Debtors believe that it is beneficial if such communications remain ongoing so as to avoid bringing contested Claims to the Court for adjudication prematurely, including by seeking mediation where appropriate to resolve outstanding Claims. In light of the outstanding Claims and the complexity of the task at hand, the Reorganized Debtors need additional time to ensure that only valid, non-objectionable Claims are allowed in the correct amount, priority, and classification.

13. The Reorganized Debtors may be prejudiced if the extension is not granted, so the Reorganized Debtors are seeking an extension out of an abundance of caution. Because the

Reorganized Debtors would be unable to timely-file new objections to outstanding Claims, claimants may try to use the deadline to strong-arm the Reorganized Debtors into a fast settlement with respect to such Claims. An extension forecloses that and other scenarios and allows the Reorganized Debtors to resolve claims based on merit, at least in the interim. Therefore, the Reorganized Debtors request that the Claims Objection Deadline under the Plan be extended an additional ninety (90) days to June 13, 2022.

Motion Practice

14. This motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this motion. Accordingly, the Reorganized Debtors submit that this motion satisfies Local Bankruptcy Rule 9013-1(a).

Notice

15. The Reorganized Debtors have provided notice of this motion to (a) the holders of outstanding Claims or the respective attorney of record, (b) the entities on the Master Service List (as defined in the case management order and available on the Reorganized Debtors' case website at www.kccllc.net/windstream), and (c) parties that have filed a request for service of papers under Bankruptcy Rule 2002. In light of the nature of the relief requested, the Reorganized Debtors respectfully submit that no further notice is necessary.

No Prior Request

16. No prior request for the relief sought in this motion has been made to this or any other court.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

Dated: March 15, 2022
New York, New York

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

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Counsel to the Reorganized Debtors

Exhibit A

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)

FOURTH 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 June 13, 2022, 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,

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.kcclle.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.

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 June 13, 2022.
3. The requirements of Local Bankruptcy Rule 9006-2 shall be deemed satisfied.
4. Entry of this Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline.
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.
6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
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.
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.
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: _____, 2022

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE