Docket #0032 Date Filed: 9/22/2020

**IN THE UNITED STATES DISTRICT COURT**
**FOR THE SOUTHERN DISTRICT OF TEXAS**
**HOUSTON DIVISION**

| | | |
|---|---|---|
| **In re:** | § | **Chapter 11** |
| **SPEEDCAST INTERNATIONAL LIMITED, *et al.*,** | § | **Bankruptcy Case No. 20-32243** |
| **Debtors.**[1] | § | **(Jointly Administered)** |
| **CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK,** | § | |
| **Appellant,** | § | **Civil Action No. 4:20-CV-01970** |
| **v.** | § | |
| **SPEEDCAST INTERNATIONAL LIMITED, *et al.*,** | § | |
| **Appellees.** | § | |

**AGREED MOTION TO EXTEND THE REINSTATEMENT DEADLINE**

Appellant Credit Agricole Corporate and Investment Bank and Appellees, SpeedCast International Limited and its affiliate debtors (collectively "SpeedCast") and the Ad Hoc Group of Secured Lenders, informed this Court on August 13, 2020, that they had reached a settlement in principle. That same day, the Court dismissed the appeal, but permitted the parties to move to reinstate the appeal within 60 days (expiring October 12, 2020) if the settlement could not be consummated. (Docket Entry No. 31).

[1] A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at http://www.kccllc.net/speedcast. The Debtors' service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.



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The parties diligently negotiated and ultimately finalized the terms of a settlement agreement. On September 11, 2020, SpeedCast moved in the Bankruptcy Court for approval of the parties' settlement agreement under Federal Rule of Bankruptcy Procedure 9019. D.E.680. Interested parties have 21 days, or until October 2, 2020, to object to the motion. *See* FED. R. BANKR. P. 2002(a)(3). In an abundance of caution, and to give the Bankruptcy Court sufficient time to consider and rule on the motion to approve the settlement agreement and to ensure that any such order becomes final and non-appealable, the parties respectfully ask that the Court extend the time in which the parties may move to reinstate this appeal to December 14, 2020.

Dated: September 22, 2020

Respectfully submitted,

**HAYNES AND BOONE, LLP**

By: */s/ Charles A. Beckham, Jr.*

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**ATTORNEYS FOR APPELLANT CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK**

**CERTIFICATE OF CONFERENCE**

I certify that Appellees, SpeedCast and the Ad Hoc Group of Secured Lenders, agree to the relief requested in this motion.

*/s/ Polly Fohn*
Polly Fohn

## CERTIFICATE OF SERVICE

In accordance with the Federal Rules of Civil Procedure, I hereby certify that a true and correct copy of the Agreed Motion to Extend the Reinstatement Deadline was served on the following counsel on September 22, 2020:

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/s/ *Polly Fohn*
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| **Appellees.** | § | |

**ORDER GRANTING MOTION TO EXTEND THE REINSTATEMENT DEADLINE**

The Court has considered the parties' agreed motion to extend the deadline for reinstating this appeal. The Court grants the motion to extend the deadline for reinstatement. (Docket Entry No. ___). Either party may move to reinstate this appeal no later than **December 14**, **2020**, on presentation of adequate proof that the settlement could not be consummated or approved. Any

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movant seeking to resubmit or reurge pending briefing or motions must do so within 14 days from the date any motion for reinstatement is filed.

**SIGNED** this _____ day of _____, 2020.

_____

**LEE H. ROSENTHAL**
**CHIEF UNITED STATES DISTRICT JUDGE**