

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	x	
In re:	:	Chapter 11
	:	
THE WEINSTEIN COMPANY HOLDINGS	:	Case No. 18-10601 (MFW)
LLC, <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors. ¹	:	
	:	Hearing Date: August 4, 2020 at 10:30 a.m. (ET)
	:	Re: Docket No. 2884
	x	

**DEBTORS’ AND THE COMMITTEE’S MOTION TO CONTINUE
HEARING ON NON-SETTLING PLAINTIFFS’ MOTION TO
CONVERT DEBTORS’ CHAPTER 11 CASES TO CHAPTER 7**

The Weinstein Company Holdings LLC and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) along with the Official Committee of Unsecured Creditors appointed in the Debtors’ chapter 11 cases (the “**Committee**”) hereby move to continue (the “**Motion to Continue**”) the hearing date on Wedil David’s and Dominique Huett’s (together, the “**Non-Settling Plaintiffs**”) *Motion by Non-Settling Plaintiffs to Convert Debtors’ Chapter 11 Cases to Chapter 7* [Docket No. 2884] (the “**Conversion Motion**”) of August 4, 2020 at 10:30 a.m. (ET) by no less than thirty days. In support of the Motion to Continue, the Debtors respectfully state as follows:

¹ The last four digits of The Weinstein Company Holdings LLC's federal tax identification number are (3837). The mailing address for The Weinstein Company Holdings LLC is 99 Hudson Street, 4th Floor, New York, New York 10013. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the 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 Debtors’ claims and noticing agent at <http://dm.epiq11.com/twc>.

PRELIMINARY STATEMENT

1. As this Court is aware, these cases have been very difficult and it has been a long and tumultuous road to reach the global settlement contained in the recently filed *Joint Chapter 11 Plan of Liquidation* (the “**Plan**”) [Docket No. 2856]. The Plan, and the settlements reflected therein, were the result of approximately two years of complex and contentious negotiations among the Debtors, the Committee, the Former Representatives, the Insurance Companies, the New York State Office of the Attorney General (the “**NYOAG**”), Class Action Counsel (collectively, the “**Settlement Parties**”), and counsel for more than a dozen individual tort claimants from the United States, Canada, and the United Kingdom.² The Debtors, the Committee, and the other Settlement Parties firmly believed the Plan was in the best interests of the estates and provided the best opportunity for a meaningful recovery for creditors, especially Harvey Weinstein’s victims.³

2. The Plan’s foundation is built upon three settlement agreements executed by the Settlement Parties. One of the key settlement agreements embodied by the Plan is the Class Action Settlement Agreement. Two weeks ago, the parties to the Class Action Settlement Agreement took a major step in support of the Plan by seeking preliminary approval of the Class Action Settlement Agreement before the District Court for the Southern District of New York (the “**District Court**”). Unfortunately, the District Court denied preliminary approval of the Class Action Settlement Agreement, an integral component of the Plan as currently structured.

3. The failure to obtain preliminary approval of the Class Action Settlement Agreement was a major disappointment and significant setback for the Debtors and their estates,

² Capitalized terms used in this Motion but not otherwise defined herein shall have the meaning ascribed to such terms in the Plan.

³ The Debtors and the Committee continue to believe this to be the case with respect to the Revised Plan described below.

but the Debtors, the Committee, and the other Settlement Parties quickly pivoted to work on a revised settlement framework in light of the District Court's ruling that would accomplish the entirety of the settlement through a revised plan ("**Revised Plan**") to be confirmed in the Bankruptcy Court. The revised framework provides that, in lieu of class action treatment of the sexual misconduct claims, such claims will be placed into a single class in a chapter 11 plan of liquidation and administered in much the same way that many other mass tort cases are handled in bankruptcy cases – without the need for a certified class in a class action lawsuit. The Settlement Parties continue to believe that a global settlement effectuated through the Revised Plan will be a far better outcome for creditors than the likely outcome of a chapter 7 liquidation. Accordingly, the Debtors and the Committee do not believe that a conversion of these chapter 11 cases to chapter 7 at this time is in the best interests of creditors or these estates.

4. As of the filing of this Motion, all of the Settlement Parties have expressed an interest in pursuing the revised settlement framework to be embodied in a Revised Plan. Moreover, the Debtors and the Committee have already circulated a draft term sheet of the Revised Plan. While this is not the appropriate pleading to describe the full terms of the Revised Plan, for present purposes it is important to note two things about it: *first*, under the Revised Plan, releases will be granted in favor of Harvey Weinstein only on an affirmative opt-in basis; and *second*, the global settlement embodied in the Revised Plan will be implemented solely through the Bankruptcy Court-supervised plan process, with no further involvement of the District Court in the pending class action.

5. Unsurprisingly, pivoting from a plan that took nearly two years to complete to negotiating and documenting an alternative plan is no small task. That said, significant progress has already been made. The Debtors and all Settlement Parties agree that the

runway is not long and if agreement cannot be reached in the short term, then the Debtors' cases will need to convert to chapter 7 cases. But some reasonable period of time is needed to afford the parties an opportunity to negotiate, discuss and complete the process and thereby avoid the harm to these estates and their creditors that would result from conversion of these chapter 11 cases to chapter 7. As discussed further below, by this Motion to Continue, the Debtors and the Committee respectfully request that this Court continue the hearing on the Conversion Motion by no less than thirty (30) days, and commit to renew their conversion motion⁴ if a Revised Plan cannot be filed on or before August 31, 2020.

6. The Debtors are requesting the aforementioned continuance because this is not a case where the Debtors are at loggerheads with their creditor constituencies and are pursuing a path that does not have significant creditor support. Rather, this is a case where the Debtors and the Committee agree that an additional short period of time to explore plan alternatives is in the best interests of the estates. This is a case where all parties to the settlement are continuing to engage in good faith discussions and are working feverishly to develop a mutually acceptable alternative path to consummate the global settlement. This should not be a case where two individual sexual harassment victims pursuing their own agenda should be permitted to hijack the process and deny all other stakeholders, including dozens of sexual harassment victims, an opportunity to settle and develop an alternative plan with wide support, including from the Committee that owes fiduciary duties to all unsecured creditors.

7. The Conversion Motion is nothing more than opportunistic gamesmanship by the Non-Settling Plaintiffs. Rather than wait an appropriate amount of time to permit the Settlement Parties to revise the Plan to address the District Court's decision, the Non-Settling

⁴ *Debtors' Motion for an Order (I) Converting Their Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 2357].

Plaintiffs hastily filed the Conversion Motion at the most opportune time for publicity, but on less than the required 21-days' notice and failed to notice all creditors, as required under Bankruptcy Rule 2002(a)(4). This Court should not condone such inappropriate litigation tactics in a motion that, given the reality of the Debtors' assets, is bound to have broad adverse consequences upon a long list of sexual harassment victims and other creditors.

8. Despite the District Court's ruling and the Conversion Motion, the Debtors and the Committee remain committed to developing a path forward, and are committed to doing so quickly. But given the complexities of these chapter 11 cases, the Debtors cannot pivot and properly develop and socialize with all applicable stakeholders alternative plans overnight. The issues involved are numerous, complex and require more than seven days for parties to discuss prior to determining whether viable alternatives are possible. The parties need a reasonable period of time to see if they can preserve the benefits of the settlement instead of thrusting the cases into chapter 7 ending any hope of a favorable resolution that would benefit the estate and the many sexual harassment victims and other creditors that remain.

9. The Debtors have developed a detailed timeframe for a process that will allow the Revised Plan to be filed on or before Monday, August 31, 2020 (the "**Revised Plan Outside Date**"). If the Debtors are not able to achieve that goal, or if, at any time prior to the Revised Plan Outside Date, the Debtors' Board of Directors determines in the good faith exercise of its business judgment that such goal is not achievable, the Debtors commit to the Court and to all parties-in-interest in these cases that the Debtors will at such time renew their own conversion motion.

10. Under the circumstances of these chapter 11 cases and in light of the improper procedural posture of the Conversion Motion, the Court should continue the hearing on

the Conversion Motion to allow the Debtors a reasonable amount of time to properly explore alternative plans prior to ruling on the Conversion Motion.

JURISDICTION AND VENUE

11. The Court has jurisdiction to consider 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 District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and, pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the Debtors consent to the entry of a final order by the Court in connection with this matter to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

12. On June 30, 2020, after more than two years of hard-fought negotiations among the Settlement Parties, the Debtors and the Committee jointly filed the Plan. In connection with the Plan, the Settlement Parties entered into a trio of settlement agreements that serve as the foundation for the Plan: (1) The Global Settlement Agreement, (2) the Class Action Settlement Agreement, and (3) the Individual Plaintiff’s Settlement Agreement.

13. On July 9, 2020, this Court held a status conference where, among other things, counsel to the Debtors apprised the Court of the developments that led to the filing of the Plan. Debtors’ counsel also informed this Court that the District Court had scheduled a hearing for July 14, 2020 (the “**Preliminary Approval Hearing**”) to consider the relief requested in the Class Members’ motion seeking preliminary approval of the Class Action Settlement Agreement.

See Motion for Plaintiffs, *Geiss v. The Weinstein Co. Holdings LLC*, No. 17-cv-09554-AKH, (S.D.N.Y. June 30, 2020), Docket No. 333 (the “**Preliminary Approval Motion**”). During the hearing, the District Court denied the relief requested in the Preliminary Approval Motion, largely on grounds related to Rule 23 class action certification requirements. See *Geiss*, No. 17-cv-09554-AKH, (S.D.N.Y. July 14, 2020), Docket No. 353 (the “**Order Denying Preliminary Certification**”).⁵

14. Just seven days after the adverse ruling on the Class Action Settlement Agreement, on July 21, 2020, the Non-Settling Plaintiffs filed and served the Conversion Motion on less than the required 21-days’ notice, without leave of the Court.

RELIEF REQUESTED

15. By this Motion to Continue, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), continuing the hearing on the Conversion Motion by no less than thirty days.

BASIS FOR RELIEF REQUESTED

16. The Debtors and the Committee respectfully request a continuance of the hearing on the Conversion Motion. The Conversion Motion, including notice thereof, is procedurally defective and prejudicial, and based on the circumstances of these chapter 11 cases and the procedural defects with the Conversion Motion, it would be inappropriate for the Court to hear the Conversion Motion on shortened and inadequate notice. Accordingly, for these reasons, as more fully set forth herein, this Court should continue the hearing on the Conversion Motion by no less than thirty days.

⁵ On July 24, 2020 the District Court issued its *Memorandum Opinion Denying Preliminary Approval of Settlement*. See *Geiss*, No. 17-cv-09554-AKH, (S.D.N.Y. July 14, 2020), Docket No. 357.

I. THE CONVERSION MOTION IS PROCEDURALLY DEFECTIVE

17. Rule 2002(a)(4) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) provides that “the trustee, *all creditors* and indenture trustees” shall receive at least 21 days’ notice by mail of “the hearing on . . . the dismissal of the case or the conversion of the case to another chapter.” *See* Fed. R. Bankr. P. 2002(a)(4) (emphasis added). In addition, Local Rule 9006-1(e) only allows the Court to issue an order shortening notice periods upon a written motion “specifying the exigencies justifying the shortened notice.” Del. Bankr. L.R. 9006-1(e).

18. The Non-Settling Plaintiffs failed to comply with the Bankruptcy Rules. First, the Non-Settling Plaintiffs filed their Conversion Motion on July 21, 2020 and noticed the Conversion Motion for hearing on August 4, 2020. Thus, the Non-Settling Plaintiffs provided only 14 days’ notice in contravention of the Bankruptcy Rules. Second, the Non-Settling Plaintiffs did not file a motion seeking to shorten notice in accordance with the Local Rules. *See* Del. Bankr. L.R. 9006-1(e). Third, the Non-Settling Plaintiffs did not provide *all creditors* with at least 21 days’ notice of the hearing to consider the Conversion Motion. *See Certificate of Service* [Docket No. 2886] (the “**Certificate of Service**”). The Non-Settling Plaintiffs’ certificate of service reflects that they only served the core Bankruptcy Rules 2002 list in lieu of all creditors. *See id.* Finally, the Non-Settling Plaintiffs also failed to file a motion seeking to limit notice to the parties served in the Certificate of Service. Given the procedural defects with the Conversion Motion, it would not be appropriate for the Court to hear the Conversion Motion on shortened and inadequate notice.

II. THE COURT SHOULD CONTINUE THE HEARING ON THE CONVERSION MOTION FOR AT LEAST 30 DAYS

19. The Debtors and the Committee submit that cause exists for the Court to continue the hearing on the Conversion Motion for at least thirty days. *First*, it would be inappropriate to grant the Conversion Motion on inadequate notice in light of the procedural defects discussed above. *Second*, the Non-Settling Plaintiffs filed the Conversion Motion a mere seven days after the District Court entered the Order Denying Preliminary Certification, leaving the Debtors without sufficient opportunity to develop and explore alternative plans. *Third*, if granted, the Conversion Motion would deny the Debtors and other parties the opportunity to evaluate and formulate a plan that may provide significant value to the Debtors' estates. Removing the Debtors and the Committee from settlement discussions at this sensitive time would only decrease the possibility of reaching a value maximizing settlement and increase the likelihood of protracted, costly, and uncertain litigation that accompanies chapter 7 cases. *Fourth*, at this time, the Debtors and the Committee submit that conversion is not in the best interests of the estates or creditors. Granting the Conversion Motion and displacing the Debtors would incentivize and all but ensure that holders of Tort Claims will race to file lift-stay motions in this Court and then race to the courthouse to attempt to exhaust the proceeds of applicable insurance policies. That result will burden the Court, may lead to an inequitable distribution of insurance proceeds among holders of Tort Claims, and will leave the Debtors' creditors with inferior recoveries as compared to the possible recoveries under a Revised Plan.

20. The Debtors are requesting a short period of time (through the Revised Plan Outside Date) to consider and negotiate an alternative plan. The Debtors understand that these estates cannot bear a further protracted negotiation and plan drafting process. Accordingly, to the extent sufficient progress is not made over the next thirty days, the Debtors will renew their

motion for conversion of these chapter 11 cases. Moreover, if earlier during that thirty-day period, it becomes clear that a Revised Plan that is in the best interest of the estate and its creditors cannot be accomplished, the Debtors will promptly renew their motion for conversion and request to schedule a corresponding hearing. For example, the Debtors have set a deadline of August 3, 2020 for the relevant parties to execute a term sheet regarding the key provisions of a Revised Plan and in the event this deadline is not met, the Debtors will renew their motion for conversion.

21. Accordingly, the Debtors and the Committee request that the Court continue the hearing on the Conversion Motion for at least thirty days. The continuance will provide the Debtors, the Committee and the other Settlement Parties with the opportunity to formulate a viable Revised Plan. Only after the Debtors and the Committee have had a reasonable opportunity to put forth a Revised Plan would it be appropriate for this Court to consider converting these cases.

RESERVATION OF RIGHTS

22. Given that the Conversion Motion was filed on inadequate notice without leave of Court, the Debtors and the Committee reserve all rights to object to the merits of the Conversion Motion on a reasonable timeline established by the Court.

NOTICE

30. The Debtors and the Committee will provide notice of Motion to Continue to: (i) the U.S. Trustee; (ii) counsel to the Committee; (iii) counsel to the DIP Agent and the Pre-Petition Agent; (iv) counsel to Spyglass; (v) the New York Attorney General and the California Attorney General; (vi) the Office of the United States Attorney for the District of Delaware; (vii) the Non-Settling Parties; and (viii) those parties entitled to receive notice pursuant to

Bankruptcy Rule 2002. The Debtors and the Committee submit that no other or further notice is necessary. Copies of the Motion to Continue are also available on the Debtors' case website at <http://dm.epiq11.com/twc>.

NO PREVIOUS REQUEST

31. The Debtors and the Committee have not made any prior request for the relief sought herein to this Court or any other court.

* * *

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order continuing the hearing on the Conversion Motion, and granting such other relief as is just and proper.

Dated: July 28, 2020
Wilmington, Delaware

/s/ David T. Queroli

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)

Paul N. Heath (No. 3704)

Zachary I. Shapiro (No. 5103)

Brett M. Haywood (No. 6166)

David T. Queroli (No. 6318)

One Rodney Square

920 North King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

- and -

CRAVATH, SWAINE & MOORE LLP

Paul H. Zumbro (admitted *pro hac vice*)

Lauren A. Moskowitz (admitted *pro hac vice*)

Salah M. Hawkins (admitted *pro hac vice*)

Worldwide Plaza

825 Eighth Avenue

New York, NY 10019

Telephone: (212) 474-1000

Facsimile: (212) 474-3700

Attorneys for the Debtors and Debtors in Possession

/s/ Colin R. Robinson

PACHULSKI STANG ZIEHL & JONES LLP.

James I. Stang (admitted *pro hac vice*)

Robert J. Feinstein (admitted *pro hac vice*)

Debra I. Grassgreen (admitted *pro hac vice*)

Jason H. Rosell (admitted *pro hac vice*)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4401

*Attorneys for the Official Committee of Unsecured
Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	x		
	:		
In re:	:		Chapter 11
	:		
THE WEINSTEIN COMPANY HOLDINGS	:		Case No. 18-10601 (MFW)
LLC, <i>et al.</i> ,	:		
	:		(Jointly Administered)
Debtors. ¹	:		
	:		Hearing: Aug. 4, 2020 at 10:30 a.m. (ET)
	:		Obj. Deadline: At the Hearing
	x		

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on July 28, 2020, The Weinstein Company Holdings LLC and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) and the Official Committee of Unsecured Creditors appointed in the Debtors’ chapter 11 cases filed the *Debtors’ and the Committee’s Motion to Continue Hearing on Non-Settling Plaintiffs’ Motion to Convert Debtors’ Chapter 11 Cases to Chapter 7* (the “**Motion**”),² with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”), in response to the *Non-Settling Plaintiffs’ Motion by Non-Settling Plaintiffs to Convert Debtors’ Chapter 11 Cases to Chapter 7* [Docket No. 2884].

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion may be filed prior to, or raised at, the hearing scheduled to commence on **August 4, 2020 at 10:30 a.m. (prevailing Eastern Time)** before The Honorable Mary F. Walrath, United States Bankruptcy

¹ The last four digits of The Weinstein Company Holdings LLC’s federal tax identification number are (3837). Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the 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 Debtors’ claims and noticing agent at <http://dm.epiq11.com/twc>.

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

Judge for the District of Delaware, at the Bankruptcy Court, 824 North Market Street, 5th Floor,
Courtroom 4, Wilmington, Delaware 19801.

Dated: July 28, 2020
Wilmington, Delaware

/s/ David T. Queroli

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)
Paul N. Heath (No. 3704)
Zachary I. Shapiro (No. 5103)
Brett M. Haywood (No. 6166)
David T. Queroli (No. 6318)
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: queroli@rlf.com

- and -

CRAVATH, SWAINE & MOORE LLP

Paul H. Zumbro (admitted *pro hac vice*)
George E. Zobitz (admitted *pro hac vice*)
Karin A. DeMasi (admitted *pro hac vice*)
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for the Debtors and Debtors in Possession

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	x	
In re:	:	Chapter 11
	:	
THE WEINSTEIN COMPANY HOLDINGS LLC, <i>et al.</i> ,	:	Case No. 18-10601 (MFW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	:	Re: Docket No. _____
	x	

**ORDER CONTINUING HEARING ON MOTION BY NON-SETTLING PLAINTIFFS
TO CONVERT DEBTORS' CHAPTER 11 CASES TO CHAPTER 7**

Upon the motion (the “**Motion to Continue**”)² of the Debtors and the Committee for entry of an order (this “**Order**”) continuing the hearing on the *Motion by Non-Settling Plaintiffs to Convert Debtors’ Chapter 11 Cases to Chapter 7* [Docket No. 2884] (the “**Conversion Motion**”), all as more fully set forth in the Motion to Continue; and the Court having jurisdiction to consider the Motion to Continue and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion to Continue and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion to Continue having been provided under the circumstances; and it appearing that no other or further notice need be provided; and the Court having reviewed

¹ The last four digits of The Weinstein Company Holdings LLC's federal tax identification number are (3837). The mailing address for The Weinstein Company Holdings LLC is 99 Hudson Street, 4th Floor, New York, New York 10013. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the 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 Debtors’ claims and noticing agent at <http://dm.epiq11.com/twc>.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion to Continue.

the Motion to Continue; and the Court having determined that the legal and factual bases set forth in the Motion to Continue establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion to Continue is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Continue is granted to the extent set forth herein.
2. The hearing on the Conversion Motion is hereby continued to _____, 2020 at __:___ .m. (ET).
3. Objections to the Conversion Motion will be due by _____, 2020 at 4:00 p.m. (ET).
4. The Debtors and the Committee are permitted, but not required, to amend, modify and/or supplement their Motion to Continue.
5. The Debtors and the Committee are authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.
6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.