

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF REVISED PROPOSED ORDER GRANTING
REORGANIZED DEBTOR'S MOTION FOR ENTRY OF FINAL
DECREE CLOSING THE CASE**

PLEASE TAKE NOTICE that on July 21, 2022, USA Gymnastics filed the *Reorganized Debtor's Motion For Entry Of Final Decree Closing The Case* [Dkt. 1936] (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that the Reorganized Debtor submits the revised proposed *Final Decree Closing Chapter 11 Case*, a copy of which is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the Motion is set to be heard at a hearing (the "**Hearing**") on August 17, 2022 at 1:30 p.m. (prevailing Eastern time).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed by August 10, 2022 at 4:00 p.m. (prevailing Eastern time).

PLEASE TAKE FURTHER NOTICE that parties may participate in the Hearing via Zoom for Government, using this link: <https://www.zoomgov.com/j/16175050888>. Parties that wish to listen to the Hearing, but not actively participate, may do so by phone: Phone: 551-285-1373 or 646-828-7666 Meeting ID: 161 7505 0888.

¹ The last four digits of the Reorganized Debtor's federal tax identification number are 7871. The location of the Reorganized Debtor's principal office is 1099 N. Meridian St., Suite 800, Indianapolis, Indiana 46204.

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be accessed through the case website at: <https://omniagentsolutions.com/usagymnastics>, or by contacting the Debtor's attorneys, on PACER, or from the Clerk of the Court.

Dated: August 4, 2022

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Catherine Steege

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Exhibit A

Revised Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

FINAL DECREE CLOSING CHAPTER 11 CASE

THIS CAUSE COMING TO BE HEARD upon the Reorganized Debtor's Motion for Entry of Final Decree (the "**Motion**") (capitalized terms not otherwise defined herein have the meanings ascribed to such terms in the Motion) filed by USA Gymnastics, as Reorganized

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Debtor in the above-captioned chapter 11 case (the “**Chapter 11 Case**”); due and sufficient notice of the Motion having been given under the circumstances and no other or further notice being necessary; and the Court having jurisdiction over this core proceeding and being fully advised in the premises,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, the Bankruptcy Court hereby enters this Final Decree and orders this Chapter 11 Case closed. The adversary proceeding docketed as *USA Gymnastics v. Liberty Insurance Underwriters, Inc.*, Adv. No. 19-50012, shall remain open.
3. Entry of this Final Decree is without prejudice to the rights of any party in interest to seek to reopen these cases for good cause shown pursuant to section 350(b) of the Bankruptcy Code.
4. Notwithstanding the entry of this Final Decree, the Settlement Trustee shall continue to file reports with this Court as required under the Trust Agreement. In addition, pursuant to Section 8.1 of the Trust Agreement, the Settlement Trustee and the FCR shall continue to file applications with this Court for reasonable compensation for services rendered. Such applications shall be deemed approved and granted by this Court twenty-one (21) days after filing unless a party in interest files an objection to any such application and obtains relief from this Court to reopen the case pursuant to section 350(b) of the Bankruptcy Code.
5. To the extent not already paid, the fees required to be paid to the U.S. Trustee pursuant to 28 U.S.C. § 1930(a)(6) shall be paid as soon as reasonably practicable after the date of the entry of this order.

6. The Court shall retain (a) jurisdiction to enforce, by injunctive relief or otherwise, the Confirmation Order, and any other orders entered in this Chapter 11 Case, and the obligations created under the Plan and the Plan Documents; (b) all other jurisdiction and authority granted to it under the Plan and the Plan Documents; and (c) jurisdiction over any pending adversary proceeding brought in connection with the Chapter 11 Case.

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