

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

In re:

M & G USA CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-12307 (BLS)

(Jointly Administered)

Related to Docket Nos. 1812, 1813, 1920 & 1927

**JOINDER OF ORBITAL INSULATION CORP. TO (I) SINOPEC'S OBJECTION TO THE
PROPOSED DISCLOSURE STATEMENT FOR DEBTORS' JOINT PLAN OF
LIQUIDATION AND (II) OBJECTION OF THE CONSTRUCTION LIENHOLDER
GROUP TO THE DISCLOSURE STATEMENT FOR JOINT PLAN OF LIQUIDATION
OF THE U.S. DEBTORS AND DEBTORS IN POSSESSION**

COMES NOW Orbital Insulation, Corp. ("Orbital"), by and through its undersigned counsel, hereby joins in Sinopec Engineering Group America, LLC ("SEGA") and Sinopec Engineering (Group) Co., Ltd.'s ("SEG" and with SEGA, "Sinopec") Objection to the Proposed Disclosure Statement for Debtors Joint Plan of Liquidation [D.I. 1927] (the "Sinopec Objection") and the Objection of Construction Lienholder Group (the "CLG") to the Disclosure Statement for Joint Plan of Liquidation of the U.S. Debtors and Debtors in Possession [D.I. 1920] (the "Construction Lienholder Group Objection"). Orbital would similarly request that the Disclosure Statement for Joint Plan of Liquidation of the U.S. Debtors and Debtors in Possession [D.I. 1813] (the "Disclosure Statement") be denied in its current form. In support of this joinder, Orbital states as follows:

¹ The Debtors are the following twelve entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): M & G USA Corporation (3449), M & G Resins USA, LLC (3236), M & G Polymers USA, LLC (7593), M & G Finance Corporation (4230), M&G Waters USA, LLC (2195), Mossi & Ghisolfi International S.a.r.l (1270), M&G Chemicals, S.A. (1022), M&G Capital S.a.r.l (7812), M & G USA Holding, LLC (3451), Chemtex International Inc. (7695), Chemtex Far East, Ltd. (2062), and Indo American Investments Inc. (9208). The Debtors' noticing address in these chapter 11 cases is 450 Gears Road, Suite 240, Houston, Texas 77067.

1. On October 24, 2017, M&G Polymers USA, LLC (“M&G Polymers”), one of the above-captioned debtors, filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On October 30, 2017 (the “Petition Date”), each of the other Debtors commenced chapter 11 cases before this Court (together with the chapter 11 case of M&G Polymers, the “Cases”).

2. On September 5, 2018, the Debtors filed their Disclosure Statement and their proposed Joint Plan of Liquidation [D.I. 1812] (the “Plan”).

3. On October 3, 2018, Sinopec filed the Sinopec Objection and the CLG filed the Construction Lienholder Group Objection detailing numerous failings in the adequacy of the Disclosure Statement.

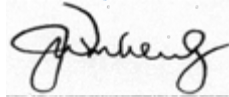
4. Accordingly, through this Joinder, Orbital hereby joins in the arguments raised in the Sinopec Objection and the Construction Lienholder Group Objection and expressly adopts, raises, and incorporates such arguments therein as if fully set forth herein. Through this Joinder, and for the reasons set forth in the Sinopec Objection and the Construction Lienholder Group Objection, Orbital requests that the Court deny the Disclosure Statement in its current form.

5. Orbital reserves the right to supplement and join in any other filings, and to present supplemental and further arguments at any hearing on the Disclosure Statement.

WHEREFORE, based on the foregoing, Orbital respectfully requests that the Disclosure Statement be denied unless and until (i) the Debtors revise the Disclosure Statement to provide such information to enable creditors to make an informed decision about the Plan, and (ii) revise the Plan so that it is confirmable.

Dated: October 12, 2018
Port Arthur, TX

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