



## O-I Glass Subsidiary Paddock Enterprises, LLC Files Chapter 11 Plan of Reorganization and Disclosure Statement

January 12, 2022

PERRYSBURG, Ohio , Jan. 12, 2022 (GLOBE NEWSWIRE) -- **FOR IMMEDIATE RELEASE**

O-I Glass, Inc. ("O-I Glass" or "O-I") today announced that its wholly owned subsidiary, Paddock Enterprises, LLC ("Paddock"), has filed its Plan of Reorganization (the "Plan") and related disclosure statement ("Disclosure Statement") with the United States Bankruptcy Court for the District of Delaware (the "Court") as part of the Chapter 11 bankruptcy case Paddock initiated on January 6, 2020. The Plan, once confirmed by the courts, will result in a permanent resolution of all current and future asbestos personal injury claims ("Asbestos Claims"). The Plan is jointly proposed by the "Plan Proponents," which are O-I Glass, the Official Committee of Asbestos Personal Injury Claimants (the "ACC"), Paddock, and the legal representative for future asbestos personal injury claimants (the "FCR").

Andres Lopez, CEO of O-I Glass, said, "We are pleased that Paddock is one significant step closer towards achieving the goal of resolving its legacy liabilities in a manner that is fair and efficient for claimants and that provides finality for O-I Glass and Paddock. This Plan represents a favorable outcome for all parties, and we look forward to the Plan's implementation as Paddock moves toward emergence."

The Plan's centerpiece is a trust established under section 524(g) of the Bankruptcy Code (the "Asbestos Trust") that will process and pay Asbestos Claims pursuant to Asbestos Trust Distribution Procedures ("TDP"). In exchange for funding the Asbestos Trust, Paddock and its parent company, O I Glass, as well as certain additional parties (collectively, the "Protected Parties"), will be protected by an injunction that will prohibit assertion of Asbestos Claims against the Protected Parties and will channel all such Asbestos Claims to the Asbestos Trust.

The Asbestos Trust would be funded with \$610 million on the effective date of the Plan. The Plan follows extensive informal negotiations and over a month of formal mediation proceedings among the Plan Proponents. A hearing to consider approval of the Disclosure Statement is scheduled with the Bankruptcy Court for February 16, 2022. Paddock anticipates a confirmation hearing on the Plan to be scheduled for the second quarter of 2022.

Paddock is represented in the Chapter 11 case by Latham & Watkins LLP and Richards, Layton & Finger, PA, and O-I Glass is represented by Morris Nichols Arsh & Tunnell LLP.

This press release is not intended as solicitation for a vote on the Plan. The Plan and the Disclosure Statement and any exhibits, when filed, will be available at: <https://cases.primereclerk.com/Paddock>

O-I Glass news releases are available on the O-I Glass website at [www.o-i.com](http://www.o-i.com).

### About O-I Glass

*At O-I Glass, Inc. (NYSE: OI), we love glass and we're proud to be one of the leading producers of glass bottles and jars around the globe. Glass is not only beautiful, it's also pure and completely recyclable, making it the most sustainable rigid packaging material. Headquartered in Perrysburg, Ohio (USA), O-I is the preferred partner for many of the world's leading food and beverage brands. We innovate in line with customers' needs to create iconic packaging that builds brands around the world. Led by our diverse team of more than 25,000 people across 72 plants in 20 countries, O-I achieved revenues of \$6.1 billion in 2020. Learn more about us: [o-i.com](http://o-i.com) / [Facebook](#) / [Twitter](#) / [Instagram](#) / [LinkedIn](#) The company routinely posts important information on its website – [www.o-i.com/investors](http://www.o-i.com/investors).*

### Forward-Looking Statements

This press release contains "forward-looking" statements related to O-I Glass and Paddock within the meaning of Section 21E of the Securities Exchange Act of 1934, as amended, and Section 27A of the Securities Act of 1933, as amended. These forward-looking statements relate to the Plan, the outcome of Paddock's Chapter 11 bankruptcy proceeding and the related impact on O-I Glass' and Paddock's business, results of operations and financial condition. Forward-looking statements reflect O-I Glass' and Paddock's current expectations and projections about future events at the time and involve uncertainty and risk. The words "believe," "will," "could," "would," "plan," "potential," and the negatives of these words and other similar expressions generally identify forward-looking statements.

It is possible that actual results may differ from expectations due to a variety of factors including, but not limited to, the following: (1) the risk that the Plan may not be approved by the Court or that other conditions necessary to implement the agreement in principle may not be satisfied, (2) the actions and decisions of participants in the bankruptcy proceeding, and the actions and decisions of third parties, including regulators, that may have an interest in the bankruptcy proceeding, (3) the terms and conditions of any reorganization plan that may ultimately be approved by the bankruptcy Court, (4) delays in the confirmation or consummation of a plan of reorganization due to factors beyond O-I Glass' and Paddock's control, (5) risks with respect to the receipt of the consents necessary to effect the reorganization, (6) risks inherent in, and potentially adverse developments related to, the bankruptcy proceeding, that could adversely affect O-I Glass and O-I Glass' liquidity or results of operations, (7) the impact of the COVID-19 pandemic and the various governmental, industry and consumer actions related thereto, (8) O-I Glass' ability to obtain the benefits it anticipates from the corporate modernization, (9) O-I Glass' ability to manage its cost structure, including its success in implementing restructuring or other plans aimed at improving O-I Glass' operating efficiency and working capital management, achieving cost savings, and remaining well-positioned to address Paddock's legacy liabilities, (10) O-I Glass' ability to acquire or divest businesses, acquire and expand plants, integrate operations of acquired businesses and achieve expected benefits from acquisitions, divestitures or expansions, (11) O-I Glass' ability to achieve its strategic plan, (12) O-I Glass' ability to improve its glass melting technology, known as the MAGMA program, (13) foreign currency fluctuations relative to the U.S. dollar, (14) changes in capital availability or cost, including interest rate fluctuations and the ability of O-I Glass to refinance debt on favorable terms, (15) the general political, economic and competitive conditions in markets and countries where O-I Glass has operations, including uncertainties related to Brexit, economic and social conditions, disruptions in the supply chain, competitive pricing pressures, inflation or deflation, changes in tax rates and laws, natural disasters, and weather, (16) O-I Glass' ability to generate sufficient future cash flows to ensure O-I Glass' goodwill is not impaired, (17)

consumer preferences for alternative forms of packaging, (18) cost and availability of raw materials, labor, energy and transportation, (19) consolidation among competitors and customers, (20) unanticipated expenditures with respect to data privacy, environmental, safety and health laws, (21) unanticipated operational disruptions, including higher capital spending, (22) O-I Glass' ability to further develop its sales, marketing and product development capabilities, (23) the failure of O-I Glass' joint venture partners to meet their obligations or commit additional capital to the joint venture, (24) the ability of O-I Glass and the third parties on which it relies for information technology system support to prevent and detect security breaches related to cybersecurity and data privacy, (25) changes in U.S. trade policies, and the other risk factors discussed in O-I Glass' Annual Report on Form 10-K for the year ended December 31, 2020 and any subsequently filed Annual Report on Form 10-K, Quarterly Reports on Form 10-Q or O-I Glass' other filings with the Securities and Exchange Commission.

**Attachment**

- [O-I Glass Subsidiary Paddock Enterprises, LLC Files Chapter 11 Plan of Reorganization and Disclosure Statement](#)

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