

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

In re

SPEEDCAST INTERNATIONAL  
LIMITED, *et al.*,

Reorganized Debtors.<sup>1</sup>

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Chapter 11

Case No. 20-32243 (MI)

Re: Docket Nos. 2092, 2113, 2120, & 2123

REORGANIZED DEBTORS'  
MOTION FOR ENTRY OF AN ORDER AUTHORIZING  
REORGANIZED DEBTORS TO FILE CERTAIN EXHIBITS UNDER SEAL

**IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.**

SpeedCast International Limited and Maritime Communication Services, Inc., as reorganized debtors in the above-captioned chapter 11 cases (together with their reorganized debtor affiliates, the “**Reorganized Debtors**”), by and through their undersigned attorneys, respectfully represent as follows in support of this motion (the “**Motion**”):

**Relief Requested**

1. By this Motion, pursuant to sections 105(a) and 107(b) of title 11 of the United States Bankruptcy Code (the “**Bankruptcy Code**”), Rule 9018 of the Federal Rules of Bankruptcy

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



Procedure (the “**Bankruptcy Rules**”), and Rule 9037-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”), the Reorganized Debtors respectfully request entry of an order authorizing the Reorganized Debtors to file under seal certain exhibits filed with the Stewart Declaration (Docket No. 2120) and the Witness and Exhibit List (Docket No. 2123), which are as follows (together, the “**Sealed Exhibits**”):<sup>2</sup>

Document	Exhibit
Master Agreement for Communication Services, dated December 21, 2018, between Maritime Communication Services, Inc. and Carnival Corporation (the “ <b>MSA</b> ”)	Exhibit 1, <i>Stewart Declaration</i> ; Exhibit 14, <i>Witness and Exhibit List</i>
Amended and Restated Master Agreement for Communication Services, effective January 1, 2022, between Maritime Communication Services, Inc. and Carnival Corporation (the “ <b>Amended MSA</b> ”)	Exhibit 2, <i>Stewart Declaration</i> ; Exhibit 15, <i>Witness and Exhibit List</i>
Letter Agreement, dated September 21, 2021, between Maritime Communication Services, Inc. and Carnival Corporation (the “ <b>Letter Agreement</b> ”)	Exhibit 3, <i>Stewart Declaration</i> ; Exhibit 16, <i>Witness and Exhibit List</i>

2. The Reorganized Debtors have filed all remaining exhibits to the Stewart Declaration and the Witness and Exhibit List on the public docket and have filed the Sealed Exhibits at Docket No. 2124.

3. The Reorganized Debtors propose providing the Sealed Exhibits to (a) this Court, (b) the Clerk of this Court, (c) the U.S. Trustee, (d) counsel to Carnival Corporation, and (e) any additional party who the Reorganized Debtors consent to providing such unredacted copies.

<sup>2</sup> “**Sealed Exhibits**” means Exhibits 1, 2, and 3 filed in the *Declaration of Clint Stewart in Support of Reorganized Debtors’ Objection to Carnival Corporation’s Motion for an Order (I) Re-Opening the Chapter 11 Cases of Maritime Communication Services, Inc., and Speedcast Int’l Ltd. and (II) Interpreting and Enforcing the Chapter 11 Plan* (Docket No. 2120) (the “**Stewart Declaration**”) and Exhibits 14, 15, and 16 filed in the *Amended Reorganized Debtors’ Witness and Exhibit List for March 25, 2026 Hearing* (Docket No. 2123) (the “**Witness and Exhibit List**”).

4. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “**Proposed Order**”).

### **Jurisdiction**

5. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **General Background**

6. On April 23, 2020, the Reorganized Debtors and 33 of their affiliates, filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “**Chapter 11 Cases**”).

7. On January 22, 2021, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosure Statement on a Final Basis, (II) Confirming Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates, (III) Approving Plan Settlement Agreement, and (IV) Granting Related Relief* (Docket No. 1397) (the “**Confirmation Order**”).

8. On March 11, 2021 (the “**Effective Date**”), all conditions to effectiveness of the Plan occurred and the Plan became effective, and the Debtors emerged from bankruptcy as the Reorganized Debtors. *See Notice of (I) Entry of Order Approving Disclosure Statement on a Final Basis and Confirming Third Amended Joint Chapter 11 Plan of SpeedCast International Limited and its Debtor Affiliates and (II) Occurrence of Effective Date* (Docket No. 1498).

9. On April 21, 2024, the Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Docket No. 1924) which closed all but two of the Chapter 11 Cases. On June 30, 2025, the Court entered the *Final Decree and Order Closing the Remaining Chapter 11 Cases* (Docket No. 2077).

10. On May 12, 2025, Carnival Corporation filed the *Motion for an Order (I) Re-Opening the Chapter 11 Cases of Maritime Communication Services, Inc., and Speedcast Int'l Ltd. and (II) Interpreting and Enforcing the Chapter 11 Plan* (Docket No. 2092), which set a hearing for **March 25, 2026 at 9:30 a.m.** (Central Time) (the “**Hearing**”).

11. On March 17, 2026, the Reorganized Debtors filed the *Objection to Carnival Corporation’s Motion for an Order (I) Re-Opening the Chapter 11 Cases of Maritime Communication Services, Inc., and Speedcast Int'l Ltd. and (II) Interpreting and Enforcing the Chapter 11 Plan* (Docket No. 2113).

12. On March 23, 2026, in connection with the Hearing, the Reorganized Debtors filed the Stewart Declaration and Witness and Exhibit List, which contained the following exhibits that were filed under seal, (a) the MSA, (b) the Amended MSA, and (c) the Letter Agreement, all of which the Reorganized Debtors assert contain sensitive commercial information regarding the Reorganized Debtors’ business and operations. *See Declaration of Clint Stewart in Support of Reorganized Debtors’ Objection to Carnival Corporation’s Motion for an Order (I) Re-Opening the Chapter 11 Cases of Maritime Communication Services, Inc., and Speedcast Int'l Ltd. and (II) Interpreting and Enforcing the Chapter 11 Plan* (Docket No. 2120); *Amended Reorganized Debtors’ Witness and Exhibit List for March 25, 2026 Hearing* (Docket Nos. 2123-2124).

**Relief Requested Should Be Granted**

13. Section 105(a) of the Bankruptcy Code codifies the Court’s inherent, equitable powers, and empowers it to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a). Moreover, pursuant to section 107(b)(1) of the Bankruptcy Code, the Court may authorize the Reorganized Debtors to file the Sealed Exhibits under seal, by permitting the issuance of an order that protects entities from

potential harm that may result from the disclosure of certain confidential information.

See 11 U.S.C. § 107(b). Specifically, section 107(b) provides, in relevant part:

On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may —  
(1) protect an entity with respect to a trade secret or confidential research, development, or commercial information. . . .

11 U.S.C. § 107(b).

14. Bankruptcy Rule 9018 sets forth the procedures by which a party may obtain a protective order authorizing the filing of a document under seal. Bankruptcy Rule 9018 provides, in relevant part, that “[o]n motion or on its own [initiative], the court may, with or without notice, [make] any order [which] justice requires (1) to protect the estate or any entity [in respect of] a trade secret or other confidential research, development, or commercial information.” Bankruptcy Rule 9018; *see also* Local Rule 9037-1(c) (“A motion, reply or other document may initially be filed under seal if the filing party simultaneously files a motion requesting that the document be maintained under seal.”).

15. Unlike its counterpart in rule 26(c) of the Federal Rules of Civil Procedure, section 107(b) of the Bankruptcy Code does not require an entity seeking such protection to demonstrate “good cause.” *See Wyndham Vacation Resorts, Inc. v. Faucett (In re Faucett)*, 438 B.R. 564, 568 (Bankr. W.D. Tex. 2010) (citing *Video Software Dealers Ass’n v. Orion Pictures Corp. (In re Orion Pictures Corp.)*, 21 F.3d 24, 28 (2d Cir. 1994) (holding that a license agreement authorizing a licensee “to reproduce, manufacture, distribute, and sell videocassettes” of three films contained confidential commercial information)). Rather, if the material sought to be protected satisfies one of the categories identified in section 107(b), the court is required to protect a requesting, interested party and has no discretion to deny the application. *See In re 50-Off Stores, Inc.*, 213 B.R. 646, 655–56 (Bankr. W.D. Tex. 1997) (“The statute, on its face, states that the

bankruptcy court is *required* to protect such an entity on request of a party in interest.” (emphasis in original)).

16. Commercial information is information which would result in “an unfair advantage to competitors by providing them information as to the commercial operations of the debtor.” *In re Faucett*, 438 B.R. at 567 (citing *In re Orion Pictures Corp.*, 21 F.3d at 27). Commercial information need not rise to the level of a “trade secret” to be protected under section 107(b) of the Bankruptcy Code. *See In re Northstar Energy, Inc.*, 315 B.R. 425, 429 (Bankr. E.D. Tex. 2004) (“A bankruptcy court is required to seal ‘documentary information filed in court that does not rise to the level of a trade secret but that is so critical to the operations of the entity seeking the protective order that its disclosure will unfairly benefit that entity’s competitors.’”) (citation omitted). Rather, section 107(b)’s protections extend to commercial information that, if disclosed to the public, could be used to give various parties an unfair advantage. *In re Orion Pictures Corp.*, 21 F.3d at 27–28. Once a court determines that a party in interest is seeking to protect “commercial information,” the court “is *required* to protect a requesting interested party and has no discretion to deny the application.” *Id.* at 27 (emphasis in original).

17. The Reorganized Debtors submit that the MSA, the Amended MSA, and the Letter Agreement fall within the scope of commercial information that may be protected by the Court pursuant to section 107(b)(1) of the Bankruptcy Code and Bankruptcy Rule 9018. In addition, section 12.1 of both the MSA and the Amended MSA require Maritime Communication Services, Inc. to keep the terms of the MSA and Amended MSA confidential. The MSA, Amended MSA, and the Letter Agreement contain commercial information regarding the Reorganized Debtors’ and their counterparties’ operations, including pricing information. This information, given its

commercially sensitive nature, could result in substantial harm to the Reorganized Debtors and/or other parties if made public. For this reason, disclosure of the Sealed Exhibits would be improper.

18. Accordingly, the Reorganized Debtors respectfully submit that good cause exists to file the Sealed Exhibits under seal.

**Reservation of Rights**

19. The Reorganized Debtors expressly reserve all of their rights.

**Notice**

20. Notice of this Motion will be served upon any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Local Rule 9013-1(d).

**WHEREFORE**, the Reorganized Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: March 23, 2026  
Houston, Texas

Respectfully submitted,

/s/ Stephanie N. Morrison

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*Attorneys for Reorganized Debtors*

**Certificate of Service**

I hereby certify that, on March 23, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Stephanie N. Morrison

Stephanie N. Morrison

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

**In re**

**SPEEDCAST INTERNATIONAL  
LIMITED, *et al.*,**

**Reorganized Debtors.<sup>1</sup>**

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**Chapter 11**

**Case No. 20–32243 (MI)**

**Re: Docket Nos. 2092, 2113, 2120, & 2123**

**ORDER AUTHORIZING  
REORGANIZED DEBTORS TO FILE CERTAIN EXHIBITS UNDER SEAL**

Upon the motion, dated March 23, 2026 (the “**Motion**”), of SpeedCast International Limited and Maritime Communication Services, Inc., as reorganized debtors in the above-captioned chapter 11 cases (together with their reorganized debtor affiliates, the “**Reorganized Debtors**”), and pursuant to sections 105(a) and 107(b) of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 9018 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rule 9037-1 of the Bankruptcy Local Rules for United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”), the Reorganized Debtors respectfully request entry of an order (a) authorizing the Reorganized Debtors to file under seal the Sealed Exhibits (filed at Docket Nos. 2120 and 2123); and (b) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper

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

notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and this Court having held a hearing to consider the relief requested in the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Reorganized Debtors and their respective estates and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Reorganized Debtors are authorized, pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9037-1, to file the Sealed Exhibits, filed at Docket No. 2124, under seal.
2. The Sealed Exhibits shall remain confidential and under seal, and shall not be made available to anyone, except that copies may be provided to (a) this Court, (b) the Clerk of this Court, (c) the U.S. Trustee, (d) counsel to Carnival Corporation, and (e) any additional party who the Reorganized Debtors consent to providing such unredacted copies.
3. Any person or entity who receives the Sealed Exhibits in accordance with this Order shall keep the Sealed Exhibits strictly confidential.
4. This Order shall be immediately effective and enforceable upon its entry.
5. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or relating to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2026  
Houston, Texas

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Marvin Isgur  
United States Bankruptcy Judge