

Motion of Invista S.A.R.L. for Relief from the Automatic Stay (the “Invista Setoff Motion”).

By the Invista Setoff Motion, Invista, S.à.r.l. (“Invista”) seeks immediate relief from the automatic stay in order to setoff certain prepetition debts owing between Invista and Debtor Chemtura Corporation (“Chemtura”).

Over a period of several years, Invista alleges that it regularly sold Terathane, a material used in the production of cast elastomers, to Chemtura, and Chemtura sold PETCAT, a product used in the manufacture of polyester resins, to Invista. Prior to March 18, 2009 (the “Petition Date”), Invista issued invoices to Chemtura in the amount of \$255,201 (the “Invista Receivable”) on account of purchases of Terathane made prior to the Petition Date, and Chemtura issued invoices to Invista in the amount of \$182,516.76 (the “Invista Payable”) on account of prepetition purchases of PETCAT.

Invista seeks relief from the automatic stay in order to setoff the Invista Payable against the Invista Receivable. Invista alleges that the requirements for setoff have been satisfied because (i) the Invista Payable and the Invista Receivable are mutual debts owed between the same parties, (ii) both the Invista Payable and the Invista Receivable arose prepetition, and (iii) applicable state law governing the transactions between Invista and Chemtura recognizes setoff rights.