

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

<p>In re:</p> <p>AN Global, LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 23-11294 (JKS)</p> <p>(Joint Administration Requested)</p> <p>Re: Docket No. 10</p>
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**CERTIFICATION OF COUNSEL REGARDING REVISED
ORDER AUTHORIZING THE DEBTORS TO REDACT INDIVIDUAL
STAKEHOLDERS’ PERSONALLY IDENTIFIABLE INFORMATION**

The undersigned hereby certifies as follows:

1. On August 28, 2023, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtors’ Motion for an Order Authorizing the Debtors to Redact Individual Stakeholders’ Personally Identifiable Information* [Docket No. 10] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached the Motion was, among other things, a proposed form of order approving the relief requested in the Motion on an interim basis (the “Proposed Interim Order”).

2. On August 29, 2023, the Court held a hearing (the “Hearing”) to consider, among other things, approval of the Motion on an interim basis. Consistent with the Court’s rulings at

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number or registration number in the applicable jurisdiction, are: AN Global LLC (5504); AgileThought, Inc. (2509); 4th Source Holding Corp. (9629); 4th Source Mexico, LLC (7552); 4th Source, LLC (7626); AgileThought Brasil-Consultoria, Em Tecnologia LTDA (01-42); AgileThought Brasil Servicos de Consultoria Em Software (01-20); AgileThought Costa Rica S.A. (6822); AgileThought Digital Solutions, S.A.P.I. de C.V. (3KR0); AgileThought México S.A. de C.V. (7E46); AgileThought, LLC (7076); AgileThought Servicios Administrativos, S.A. de C.V. (4AG1); AgileThought Servicios México S.A. de C.V. (8MY5); AgileThought, S.A.P.I. de C.V. (No Tax ID); AGS Alpama Global Services USA, LLC (0487); AN Data Intelligence, S.A. de C.V. (8I73); AN Extend, S.A. de C.V. (1D80); AN Evolution, S. de R.L. de C.V. (7973); AN USA (5502); AN UX, S.A. de C.V. (7A42); Cuarto Origen, S. de R.L. de C.V. (0IQ9); Entrepids México, S.A. de C.V. (OCYA); Entrepids Technology Inc. (No Tax ID); Facultas Analytics, S.A.P.I. de C.V. (6G37); Faktos Inc., S.A.P.I. de C.V. (3LLA); IT Global Holding LLC (8776); and QMX Investment Holdings USA, Inc. (9707). The Debtors’ headquarters are located at 222 W. Las Colinas Boulevard, Suite 1650E, Irving, Texas 75039.



the Hearing and to resolve informal comments from the Office of the United States Trustee for the District of Delaware, the Debtors made certain revisions to the Proposed Interim Order that are incorporated in the revised proposed form of order attached hereto as **Exhibit 1** (the “**Revised Proposed Interim Order**”).

3. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Interim Order against the Proposed Interim Order is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtors respectfully request that the Revised Proposed Interim Order, attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Remainder of page intentionally left blank.

Dated: August 29, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ R Stephen McNeill

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Proposed Counsel for the Debtors and Debtors-in-Possession

EXHIBIT 1

(Revised Proposed Interim Order)

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

In re

AN GLOBAL LLC, et al.,¹

Debtors.

Chapter 11

Case No. 23-11294 (JKS)

(Jointly Administered)

Re: Docket No. 10

**ORDER AUTHORIZING THE DEBTORS TO REDACT INDIVIDUAL
STAKEHOLDERS' PERSONALLY IDENTIFIABLE INFORMATION**

Upon the motion (the "Motion")² of the Debtors for an order authorizing the Debtors to redact individual stakeholders' personally identifiable information; and this Court having reviewed the Motion and the First Day Declaration; and this Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding

¹. The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number or registration number in the applicable jurisdiction, are: AN Global LLC (5504); AgileThought, Inc. (2509); 4th Source Holding Corp. (9629); 4th Source Mexico, LLC (7552); 4th Source, LLC (7626); AgileThought Brasil-Consultoria, Em Tecnologia LTDA (01-42); AgileThought Brasil Servicos de Consultoria Em Software (01-20); AgileThought Costa Rica S.A. (6822); AgileThought Digital Solutions, S.A.P.I. de C.V. (3KR0); AgileThought México S.A. de C.V. (7E46); AgileThought, LLC (7076); AgileThought Servicios Administrativos, S.A. de C.V. (4AG1); AgileThought Servicios México S.A. de C.V. (8MY5); AgileThought, S.A.P.I. de C.V. (No Tax ID); AGS Alpama Global Services USA, LLC (0487); AN Data Intelligence, S.A. de C.V. (8I73); AN Extend, S.A. de C.V. (1D80); AN Evolution, S. de R.L. de C.V. (7973); AN USA (5502); AN UX, S.A. de C.V. (7A42); Cuarto Origen, S. de R.L. de C.V. (0IQ9); Entrepids México, S.A. de C.V. (OCYA); Entrepids Technology Inc. (No Tax ID); Facultas Analytics, S.A.P.I. de C.V. (6G37); Faktos Inc., S.A.P.I. de C.V. (3LLA); IT Global Holding LLC (8776); and QMX Investment Holdings USA, Inc. (9707). The Debtors' headquarters are located at 222 W. Las Colinas Boulevard, Suite 1650E, Irving, Texas 75039.

². Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and upon the First Day Declaration and the record of the Hearing and all the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 107(c)(1)(A) of the Bankruptcy Code, the Debtors are authorized, but not directed, to redact the home addresses and email addresses of individual stakeholders, including but not limited to current and former employees and individual equityholders, of the Debtors from the creditor matrix, list of equityholders, statements and schedules, and any other paper filed or to be filed with the Court in the Chapter 11 Cases, and to provide an unredacted version of the creditor matrix (or any other redacted papers filed in the Chapter 11 Cases) to U.S. Trustee, counsel to any official committee of unsecured creditors appointed in the Chapter 11 Cases, the Court, and such other persons as the Debtors deem appropriate or as the Court may later order.
3. The Debtors shall (i) file an unredacted version of the creditor matrix, with the residential addresses, under seal with the Clerk’s office, and (ii) provide an unredacted version of the matrix, with the residential addresses, to the Debtors’ claims agent, the U.S. Trustee and counsel to the Committee, once appointed, as well as to any subsequently appointed trustee.

4. Any service by the Debtors or the Committee on the Debtors' employees and other individual creditors (including but not limited to service of the bar date notice), shall be made to their residential addresses.

5. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service. The Debtors shall provide the personally identifiable information to any party in interest that files a motion that indicates the reason such information is needed and that, after notice and a hearing, is granted by the Court.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

7. Notwithstanding anything in the Bankruptcy Rules to the contrary, this Order shall be effective and enforceable immediately upon entry hereof.

8. The Debtors are authorized and empowered to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

9. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

EXHIBIT 2

(Blackline)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

AN GLOBAL LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11294 (~~---~~JKS)

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Re: Docket No. ~~---~~10

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Upon the motion (the "Motion")² of the Debtors for an order authorizing the Debtors to redact individual stakeholders' personally identifiable information; and this Court having reviewed the Motion and the First Day Declaration; and this Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended*

¹. ~~A complete list of the~~The Debtors in these ~~chapter 11 cases may be obtained on the website of the Debtors'~~claims and noticing agent at <http://www.keelle.net/AgileThought> Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number or registration number in the applicable jurisdiction, are: AN Global LLC (5504); AgileThought, Inc. (2509); 4th Source Holding Corp. (9629); 4th Source Mexico, LLC (7552); 4th Source, LLC (7626); AgileThought Brasil-Consultoria, Em Tecnologia LTDA (01-42); AgileThought Brasil Servicos de Consultoria Em Software (01-20); AgileThought Costa Rica S.A. (6822); AgileThought Digital Solutions, S.A.P.I. de C.V. (3KR0); AgileThought México S.A. de C.V. (7E46); AgileThought, LLC (7076); AgileThought Servicios Administrativos, S.A. de C.V. (4AG1); AgileThought Servicios México S.A. de C.V. (8MY5); AgileThought, S.A.P.I. de C.V. (No Tax ID); AGS Alpama Global Services USA, LLC (0487); AN Data Intelligence, S.A. de C.V. (8I73); AN Extend, S.A. de C.V. (1D80); AN Evolution, S. de R.L. de C.V. (7973); AN USA (5502); AN UX, S.A. de C.V. (7A42); Cuarto Origen, S. de R.L. de C.V. (0IQ9); Entrepids México, S.A. de C.V. (OCYA); Entrepids Technology Inc. (No Tax ID); Facultas Analytics, S.A.P.I. de C.V. (6G37); Faktos Inc., S.A.P.I. de C.V. (3LLA); IT Global Holding LLC (8776); and QMX Investment Holdings USA, Inc. (9707). The Debtors' ~~address is~~headquarters are located at 222 W. Las Colinas Boulevard, Suite 1650E, Irving, TXTexas 75039.

². Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Standing Order of Reference from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and upon the First Day Declaration and the record of the Hearing and all the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 107(c)(1)(A) of the Bankruptcy Code, the Debtors are authorized, but not directed, to redact the home addresses and email addresses of individual stakeholders, including but not limited to current and former employees and individual equityholders, of the Debtors from the creditor matrix, list of equityholders, statements and schedules, and any other paper filed or to be filed with the Court in the Chapter 11 Cases, and to provide an unredacted version of the creditor matrix (or any other redacted papers filed in the Chapter 11 Cases) to U.S. Trustee, counsel to any official committee of unsecured creditors appointed in the Chapter 11 Cases, the Court, and such other persons as the Debtors deem appropriate or as the Court may later order.

3. The Debtors shall (i) file an unredacted version of the creditor matrix, with the residential addresses, under seal with the Clerk's office, and (ii) provide an unredacted version of the matrix, with the residential addresses, to the Debtors' claims agent, the U.S. Trustee and counsel to the Committee, once appointed, as well as to any subsequently appointed trustee.

4. Any service by the Debtors or the Committee on the Debtors' employees and other individual creditors (including but not limited to service of the bar date notice), shall be made to their residential addresses.

5. ~~3.~~ Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service. The Debtors shall provide the personally identifiable information to any party in interest that files a motion that indicates the reason such information is needed and that, after notice and a hearing, is granted by the Court.

6. ~~4.~~ Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

7. ~~5.~~ Notwithstanding anything in the Bankruptcy Rules to the contrary, this Order shall be effective and enforceable immediately upon entry hereof.

8. ~~6.~~ The Debtors are authorized and empowered to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

9. ~~7.~~ This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.