

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

In re:

AMBIPAR EMERGENCY RESPONSE,

Debtor.<sup>1</sup>

)  
) Chapter 11  
)  
) Case No. 25-90524 (ARP)  
)  
)  
)

**DEBTOR’S MOTION FOR ENTRY OF  
AN ORDER (I) EXTENDING TIME TO FILE (A) SCHEDULES  
OF ASSETS AND LIABILITIES AND SCHEDULES OF EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES, AND (B) STATEMENT OF  
FINANCIAL AFFAIRS, (II) MODIFYING REQUIREMENT TO FILE LIST  
OF EQUITY SECURITY HOLDERS, (III) EXTENDING TIME TO FILE, AND  
MODIFYING FREQUENCY OF, REPORTS UNDER BANKRUPTCY RULE 2015-3,  
(IV) AUTHORIZING REDACTING OF CERTAIN PERSONALLY IDENTIFIABLE  
INFORMATION OF NATURAL PERSONS, AND (V) GRANTING RELATED RELIEF**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Ambipar Emergency Response, the above-captioned debtor and debtor in possession (the “Debtor”), respectfully states the following in support of this motion (this “Motion”):

**Relief Requested**

1. The Debtor seeks entry of an order, substantially in the form attached hereto (the “Order”) (i) extending the deadline by which the Debtor must file its schedules of assets and

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 0263. The Debtor’s address is 2346 Avenida Angelica, 5th Floor, São Paulo, SP, 01228-200, Brazil.



liabilities, schedules of executory contracts and unexpired leases, and statements of financial affairs (collectively, the “Schedules and Statements”) by 45 days, for a total of 59 days from the Petition Date (defined below), through and including December 18, 2025, without prejudice to the Debtor’s ability to request additional extensions; (ii) modifying the requirement to file a list of equity security holders; (iii) extending the deadline by which the Debtor must file its initial report under Bankruptcy Rule 2015.3 to 59 days from the Petition Date (defined below) (i.e. December 18, 2025), without prejudice to the Debtor’s ability to request additional extensions, and modifying rule 2015.3-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”); (iv) authorizing the Debtor to redact certain personally identifiable information of natural persons; and (v) granting related relief.

### **Jurisdiction and Venue**

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, and this is a core proceeding pursuant to 28 U.S.C. § 157(b).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105(a) and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), rules 1007(c), 2002, 6003, and 9006(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rules 1075-1 and 9013-1(b) of the Bankruptcy Local Rules and the *Procedures for Complex Cases in the Southern District of Texas* (the “Complex Case Procedures”).

### **Background**

5. On October 20, 2025 (the “Petition Date”), Debtor filed its voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is managing its assets as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the

appointment of a trustee or examiner has been made in this chapter 11 case, and no statutory committees have been appointed.<sup>2</sup>

### **Basis for Relief**

#### **I. Extending the Time for the Debtor to File Schedules and Statements Is Warranted.**

6. The requirements of section 521 of the Bankruptcy Code and Bankruptcy Rules 1007(b) and 1007(c) ordinarily require debtors to file their Schedules and Statements within 14 days after their petition date. Pursuant to Bankruptcy Rules 1007(c) and 9006(b), the Court has authority to extend the time required for filing of the Schedules and Statements “for cause.” Fed. R. Bankr. P. 1007(c) and 9006(b). The Debtor submits that cause exists to grant the relief requested herein. As of the filing of this Motion, and as reflected on the list of top 30 unsecured creditors filed with the chapter 11 petition, the Debtor has a limited number of creditors and is party to very few contracts. However, as discussed in the First Day Declaration, the Debtor is part of the larger Ambipar group, which is in the early stages of a complex, multi-jurisdictional restructuring. The team responsible for completing the Schedules and Statements is dealing with myriad requests related to transitioning Ambipar into its global restructuring proceedings; furthermore, certain key Debtor personnel left the Company in recent weeks. Consequently, the Debtor seeks additional time to accurately and comprehensively complete the Schedules and Statements.

7. If the Debtor were required to complete Schedules and Statements before December 18, 2025, the Debtor may have to later supplement or revise the Schedules and Statements. Indeed, the Debtor already amended its initial first day declaration to describe a material (but contingent,

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<sup>2</sup> Further information about the Debtor is available in the *Amended Declaration of Thiago da Costa Silva in Support of Chapter 11 Petition* [Docket No. 15] (the “First Day Declaration”). Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the First Day Declaration.

unliquidated and disputed) claim that was inadvertently omitted by the declarant from the initial version of his declaration. Any amendments to the Schedules and Statements will increase the Debtor's administrative expenses, cause confusion to third parties, and complicate the Debtor's case administrative efforts. Moreover, the Debtor does not believe that any creditors will be prejudiced by the extension of time requested herein. Based on the foregoing, the Debtor respectfully submits that cause exists for granting the Debtor's requested extension of time to file the Schedules and Statements.

8. Courts in this jurisdiction have granted the relief requested herein in comparable chapter 11 cases. *In re Anthology Inc.*, Case No. 25-90498 (ARP) (S.D. Tex. Sept. 30, 2025) [Docket No. 82] (extending time to file Schedules and Statements to 59 days after the petition date); *In re Sunnova Energy International Inc.*, Case No. 25-90160 (ARP) (S.D. Tex. June 9, 2025) [Docket No. 62] (same); *In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. Apr. 22, 2025) [Docket No. 90] (same); *In re Northvolt AB*, No. 24-90577 (ARP) (Bankr. S.D. Tex. Nov. 21, 2024) [Docket No. 70] (same).

## **II. Modifying the Requirement for the Debtor to File a List of the Equity Security Holders and to Provide Notice Directly to All Equity Security Holders Is Warranted.**

9. The Bankruptcy Rules contain certain requirements with respect to a debtor's equity security holders. Bankruptcy Rule 1007(a)(3) requires a debtor to file, within fourteen days after the petition date, a list of the debtor's equity security holders. Bankruptcy Rule 2002(d), in turn, requires that equity security holders be provided notice of, among other things, the commencement of the bankruptcy case and the confirmation hearing. Bankruptcy courts have authority to modify or waive the requirements under both rules. *See* Fed. R. Bankr. P. 1007(a)(3) (“[U]nless the court orders otherwise, a Chapter 11 debtor must . . . file a list of the debtor's equity security holders . . . .”); Fed. R. Bankr. P. 2002(d) (“[U]nless the court orders otherwise, in a

Chapter 11 case the clerk or the court’s designee must give notice . . . to the equity security holders . . . .”); *see also* 11 U.S.C. § 105(a) (“The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”); Fed. R. Bankr. P. 9007 (“Unless these rules provide otherwise, when notice is to be given, the court must designate: (1) the deadline for giving it; (2) the entities to whom it must be given; and (3) the form and manner of giving it.”).

10. The Debtor has already filed a list of registered equity holders (the “Equity Holder List”). *See* Docket No. 35. To the extent that the Equity Holder List does not already satisfy Bankruptcy Rule 1007, the Debtor respectfully requests that any further requirements be waived.

11. Although the Debtor’s Class A Ordinary Shares are publicly traded on the New York Stock Exchange under the ticker symbol “AMBI,” the Equity Holder List identifies actual holders (as opposed to merely registered holders) of approximately 85% of the Class A Ordinary Shares.<sup>3</sup> The remaining 15% cannot be readily traced to specific individual holders. The Debtor would need to obtain the names and addresses of the equity security holders from the transfer agent. Preparing and submitting such a list with last-known addresses for each equity security holder and sending notices to all such parties would incur significant expense and an administrative burden with limited corresponding benefit to the estate or parties in interest.

12. The Debtor has taken, or will take, several actions to inform all of its equity security holders of the commencement of this chapter 11 case. With its petition, the Debtor filed a list of persons and entities who hold 5 percent or more of its outstanding common stock and has served them with the notice of commencement of this case. *See* Docket No. 26. The Debtor also filed the Equity Holder List and has served the registered equity holders disclosed therein with the notice

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<sup>3</sup> As discussed in the First Day Declaration, the Debtor has also issued Class B Ordinary Shares (all of which are held by Ambipar Topco) and has outstanding warrants to purchase Class A Ordinary Shares.

of commencement of the case. *See id.* The day after the petition was filed, the Debtor issued a press release and filed an 6-K with the U.S. Securities and Exchange Commission announcing the chapter 11 filing. Further, the Debtor has established, through its noticing agent Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), a publicly-accessible case website at <https://www.veritaglobal.net/ambipar> that provides information about this case and copies of all public filings free of charge.

13. For these reasons, the Debtor requests that the Court waive the requirements to file a list of, and to provide notice directly to, the Debtor’s remaining equity security holders (other than registered holders), as courts in this jurisdiction have done in comparable chapter 11 cases. *See, e.g., In re Wolfspeed, Inc.*, Case No. 25-90163 (CML) (S.D. Tex. July 1, 2025) [Docket No 61] (waiving the requirement that the debtors file a list of equity security holders pursuant to Bankruptcy Rule 1007(a)(3)); *In re Sunnova Energy International Inc.*, Case No. 25-90160 (ARP) (S.D. Tex. June 9, 2025) [Docket No. 64] (same); *In re Glob. Clean Energy Holdings, Inc.*, No. 25-90113 (ARP) (Bankr. S.D. Tex. Apr. 16, 2025) [Docket No. 54] (same); *In re Vertex Energy, Inc.*, No. 24-90507 (CML) (Bankr. S.D. Tex. Sept. 25, 2024) [Docket No. 65] (same); *In re Digit. Media Sols., Inc.*, No. 24-90468 (ARP) (Bankr. S.D. Tex. Sept. 12, 2024) [Docket No. 48] (same).

### **III. Extending the Time for the Debtor to File Reports under Bankruptcy Rule 2015.3 and Modifying the Frequency of such Reports Is Warranted.**

14. Bankruptcy Rule 2015.3(a) requires a chapter 11 debtor in possession to file “periodic financial reports of the value, operations, and profitability of each entity that is not a publicly traded corporation or a debtor . . . , and in which the estate holds a substantial or controlling interest.” By default, the first such report (a “Rule 2015.3 Report”) must be filed by seven days before the first date set for the meeting of creditors under section 341 of the Bankruptcy Code, and subsequent reports must be filed every six months. *See* Fed. R. Bankr. P. 2015.3(b). However, a

bankruptcy court may, “after notice and a hearing, vary the reporting requirement . . . for cause . . .” Fed. R. Bankr. P. 2015.3(d). Additionally, Bankruptcy Local Rule 2015-3 requires the Debtor to submit Rule 2015.3 Reports on a monthly basis.

15. The justifications for extending the deadline for the Schedules and Statements also apply to the deadline for filing the initial Rule 2015.3 Report. As described in the First Day Declaration, the Debtor is a holding company which operates through many non-debtor indirect subsidiaries (including joint ventures with third parties), many of which are organized and operated in jurisdictions outside the United States. While the Debtor has historically reported consolidated financial information for the Debtor and its subsidiaries in connection with its periodic SEC reporting, it has not historically prepared and reported separate financial statements for each of its operating subsidiaries, as contemplated by Rule 2015.5. To prepare the Rule 2015.3 Report, the Debtor and its advisors will need to compile information from books and records located at locations around the globe, including (with respect to its Brazilian operating subsidiaries) entities that have just commenced insolvency proceedings in Brazil. Timely preparation of the Rule 2015.3 Reports at this early state of this case is practically impossible, and at minimum would divert resources and cause distraction from the stabilization of the Response business, which is critical to preserving the value of this estate.

16. Extending the deadline for Rule 2015.3 Reports will also provide the Debtor and their advisors with the necessary time to research, analyze, and examine the non-Debtor subsidiaries’ books and records. The Debtor may also use the time to provide information to, and work with, the Office of the U.S. Trustee for Region 7 (the “U.S. Trustee”) to determine the appropriate nature and scope of the Rule 2015.3 Reports and to propose modifications to the standard reporting requirements.

17. Further, the Debtor submits that cause exists here to modify Bankruptcy Local Rule 2015-3 to permit the Debtor to file the Rule 2015.3 Reports every six months instead of monthly. Requiring the Debtor to file the Rule 2015.3 Reports monthly in this case would create an unnecessary administrative burden for the Debtor's estate due to the amount of time and effort that would need to be expended producing such reports—time and effort that would be better spent focusing on the Debtor's restructuring. Moreover, by this requested modification, the Debtor does not seek a full waiver of its obligation to file the Rule 2015.3 Reports; rather, the Debtor merely request to file the Rule 2015.3 Reports in the timeframe contemplated by Bankruptcy Rule 2015.3. Accordingly, there will be no harm to any parties in interest on account of this requested modification, as they will receive the required information contained in the Rule 2015.3 Reports at the frequency contemplated by the Bankruptcy Rules.

18. Courts in this District have regularly found cause to extend the initial deadline for filing Rule 2015.3 Reports and to modify the requirement to file monthly Rule 2015.3 Reports in cases of comparable complexity and geographic scope. *See, e.g., In re Sunnova Energy International Inc.*, Case No. 25-90160 (ARP) (Bankr. S.D. Tex. June 9, 2025) [Docket No. 62] (granting extension to 59 days after the petition date and permitting filing every six months); *In re Ascend Performance Materials Holdings Inc.*, Case No. 25-90127 (CML) (Bankr. S.D. Tex. Apr. 22, 2025) [Docket No. 90] (granting extension to 59 days from the petition date and permitting filing every six months); *In re Glob. Clean Energy Holdings, Inc.*, Case No. 25-90113 (ARP) (Bankr. S.D. Tex. Apr. 16, 2025) [Docket No. 49] (granting an extension to 54 days after the petition date and permitting filing every six months).

19. For these reasons, the Debtor requests that the Court extend the deadline for the Debtor to file its initial Rule 2015.3 Report to 59 days after the Petition Date, without prejudice to

the Debtor to seek a further extension, and to modify Bankruptcy Local Rule 2015-3 to permit the Debtor to file the Rule 2015.3 Reports every six months instead of monthly.

**IV. Authorizing the Debtor to Redact Certain Personally Identifiable Information Is Warranted.**

20. Section 107(c)(1) of the Bankruptcy Code provides that the Court:

[F]or cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual’s property:

(A) Any means of identification . . . contained in a paper filed, or to be filed, in a case under [the Bankruptcy Code].

(B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

21. Bankruptcy Local Rule 9037-1(b) further recognizes that “[c]ertain documents are routinely redacted to remove personal identifying information or other content that is not relevant to a decision by the Court.” This rule provides that: “[i]n those instances, (i) the document may be filed in redacted form only; (ii) no document should be filed that contains the redacted information; and (iii) the balance of this Rule 5003-1 [sic] does not apply.” Bankruptcy Local Rule 9037-1(b).

22. The Debtor requests authority to redact from any paper filed or to be filed with the Court in this chapter 11 case, including, but not limited to, the Schedules and Statements, the Equity Holder List, proofs of claim, and any related affidavits of service, the names, home and email addresses, and other personally identifiable information of all natural persons—including individual equity holders. This relief is requested because (a) such personally identifiable information can be used to perpetrate identity theft and phishing scams or to locate survivors of domestic violence, harassment, or stalking under section 107(c)(1) of the Bankruptcy Code and (b) disclosure of such personally identifiable information or personal data risks violating data and

privacy laws and regulations, thereby exposing the Debtor to potential civil liability and significant financial penalties.

23. Redaction is necessary to protect information that would create an “undue risk of identity theft or other unlawful injury to the individual or the individual’s property.” 11 U.S.C. § 107(c)(1). Courts in this jurisdiction have granted the relief requested herein in comparable chapter 11 cases. *See, e.g., In re Wolfspeed, Inc.*, Case No. 25-90163 (CML) (S.D. Tex. July 1, 2025) [Docket No 61] (authorizing the debtors to redact personally identifiable information, including the names, home addresses, and personal email addresses, of individuals listed on documents filed with the court); *In re Sunnova Energy International Inc.*, Case No. 25-90160 (ARP) (S.D. Tex. June 9, 2025) [Docket No. 64] (same); *In re Ascend Performance Materials Holdings Inc.*, Case No. 25-90127 (CML) (Bankr. S.D. Tex. Apr. 22, 2025) [Docket No. 88] (same); *In re Glob. Clean Energy Holdings, Inc.*, No. 25-90113 (ARP) (Bankr. S.D. Tex. Apr. 16, 2025) [Docket No. 54] (same); *In re Northvolt AB*, No. 24-90577 (ARP) (Bankr. S.D. Tex. Nov. 21, 2024) [Docket No. 30] (same).

24. For these reasons, the Debtor submits that cause exists to authorize the Debtor to redact, pursuant to section 107(c)(1) of the Bankruptcy Code, and in compliance with applicable privacy or data protection laws and regulations, the names, home addresses, and email addresses of natural persons listed on the Schedules and Statements, the Equity Holder List, proofs of claim, any related affidavits of service, or any other document filed with the Court. Absent such relief, the Debtor (a) may be in violation of applicable privacy or data protection laws, thereby exposing the Debtor to monetary penalties, (b) would unnecessarily render individuals more susceptible to identity theft and phishing scams, and (c) could jeopardize the safety of individuals who, unbeknownst to the Debtor, are survivors of domestic violence, harassment, or stalking by

publishing their home and email addresses without any advance notice or opportunity to opt out or take protective measures.

25. The Debtor proposes to provide unredacted versions of the Schedules and Statements, the Equity Holder List, proofs of claim, any related affidavits of service, and any other filings redacted pursuant to the proposed order to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in this chapter 11 case, (d) the Noticing Agent, and (e) any party in interest upon a request to the Debtor (email being sufficient) or to the Court that is reasonably related to this chapter 11 case and that represents that the unredacted version(s) will be maintained in confidence. In each case, this would be subject to a review of whether such disclosure, on a case-by-case basis, would violate any obligation under any other privacy or data protection law or regulation. Nothing requested herein is intended to preclude a party in interest's right to file a motion requesting that the Court unseal the information redacted by the Order. Furthermore, to the extent notice and/or service by mail (as opposed to email) is required or requested, the Debtor will instruct Verita to serve individuals at their home addresses, ensuring that each individual will receive the same notices in the chapter 11 case as all other creditors without the unnecessary public disclosure of his or her home address.

#### **Notice**

26. The Debtor will provide notice of this Motion to the following parties: (a) the Office of the U.S. Trustee for the Southern District of Texas; (b) the holders of the 30 largest unsecured claims against the Debtor; (c) the United States Attorney's Office for the Southern District of Texas; (d) the Internal Revenue Service; (e) the state attorneys general for states in which the Debtor conducts business; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Request**

27. No prior motion for the relief requested herein has been made to this or any other court.

*[Remainder of this page intentionally left blank]*

WHEREFORE, the Debtor respectfully requests that the Court enter the Order, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted this 3rd day of November 2025.

**GRAY REED**

By: /s/ Jason S. Brookner

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**PROPOSED COUNSEL TO THE DEBTOR**

**Certificate of Service**

The undersigned hereby certifies that on the 3rd day of November 2025, he caused a true and correct copy of the foregoing document by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Jason S. Brookner*

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Jason S. Brookner

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

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In re:

AMBIPAR EMERGENCY RESPONSE,

Debtor.<sup>1</sup>

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) Chapter 11  
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) Case No. 25-90524 (ARP)  
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) **Re: Docket No. \_\_\_\_\_**

**ORDER (I) EXTENDING TIME TO FILE  
(A) SCHEDULES OF ASSETS AND LIABILITIES AND SCHEDULES OF  
EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND (B) STATEMENT  
OF FINANCIAL AFFAIRS, (II) MODIFYING REQUIREMENT TO FILE LIST  
OF EQUITY SECURITY HOLDERS, (III) EXTENDING TIME TO FILE, AND  
MODIFYING FREQUENCY OF, REPORTS UNDER BANKRUPTCY RULE 2015-3,  
(IV) AUTHORIZING REDACTING OF CERTAIN PERSONALLY IDENTIFIABLE  
INFORMATION OF NATURAL PERSONS, AND (V) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned debtor and debtor in possession (the “Debtor”) for entry of an order (this “Order”): (i) extending the deadline to file the Schedules and Statements, (ii) modifying the requirement to file a list of equity security holders; (iii) extending the deadline by which the Debtor must file its initial report under Bankruptcy Rule 2015.3 and modifying Bankruptcy Local Rule 2015-3; (iv) authorizing the Debtor to redact certain personally identifiable information of natural persons; and (v) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 0263. The Debtor’s address is 2346 Avenida Angelica, 5th Floor, São Paulo, SP, 01228-200, Brazil.

<sup>2</sup> Capitalized terms used but not defined herein have the meaning ascribed to such terms in the Motion.

district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; 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 time within which the Debtor must file the Schedules and Statements is extended through and including December 18, 2025, without prejudice to the Debtor's right to seek additional extensions. The Debtor may obtain further extensions to file its Schedules and Statements by agreement with the U.S. Trustee (by filing an agreed stipulation on the docket) without the need for further order from this Court.

2. The time within which the Debtor must file the initial Rule 2015.3 Report is extended through and including December 18, 2025, without prejudice to the Debtor's right to seek additional extensions. The Debtor may obtain further extensions to file the initial Rule 2015.3 Report by agreement with the U.S. Trustee (by filing an agreed stipulation on the docket) without the need for further order from this Court.

3. The Debtor's obligation to file Rule 2015.3 Reports every month in compliance with Bankruptcy Local Rule 2015-3 is hereby modified to permit the Debtor to file Rule 2015.3

every six (6) months following the filing of the initial Rule 2015.3 Report, until the effective date of a plan has occurred or the case has been dismissed or converted.

4. The requirements that the Debtor file a list of equity security holders pursuant to Bankruptcy Rule 1007(a)(3) and provide notice directly to equity security holders under Bankruptcy Rule 2002(d) are waived.

5. The Debtor and Verita (as noticing agent) are authorized to redact on the Schedules and Statements, the Equity Holder List, proofs of claim, any related affidavits of service, and any other documents filed with this Court, the names, home addresses, email addresses, and other personally identifiable information of all natural persons. The Debtor shall provide unredacted versions of the Schedules and Statements, the Equity Holder List, proofs of claim, any related affidavits of service, and any other filings redacted pursuant to this Order to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in this chapter 11 cases, (d) Verita, and (e) any party in interest upon a request to the Debtor (email being sufficient) or to this Court that is reasonably related to this chapter 11 case, subject to any applicable privacy or data protection law or regulation, *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request and shall represent that the unredacted version(s) of the documents will be maintained in confidence. The Debtor shall inform the Court and the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order. Nothing herein precludes a party in interest's right to file a motion requesting that this Court unseal the information redacted by this Order. For the avoidance of doubt, Bankruptcy Local Rule 9037-1(b) shall apply to any document redacted in accordance with this Order.

6. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules, the Bankruptcy Local Rules, and the Complex Case Procedures are satisfied by such notice are satisfied by such notice.

8. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: \_\_\_\_\_, 2025

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Alfredo R. Perez  
United States Bankruptcy Judge