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

In re:	)	Chapter 11
AMBIPAR EMERGENCY RESPONSE,	)	Case No. 25-90524 (ARP)
Debtor. <sup>1</sup>	)	
	)	

# AGENDA FOR HEARING ON DECEMBER 19, 2025, AT 10:00 A.M. CENTRAL TIME

The above-captioned debtor (the "<u>Debtor</u>") hereby files its agenda for the matters set for hearing on <u>Friday</u>, <u>December 19</u>, <u>2025</u>, <u>at 10:00 a.m.</u> (<u>prevailing Central Time</u>), before the Honorable Alfredo R. Perez, United States Bankruptcy Judge for the Southern District of Texas. The Debtor will ask the Court to consider the following matters:

## I. <u>Contested Matters:</u>

## A. Authorization to Enter Into Funding Agreement and Open Bank Accounts

- i. Related Documents:
  - a. Debtor's Motion for Entry of an Order Authorizing the Debtor to (i) Enter into the Funding Agreement, (ii) Open Bank Accounts and (iii) Granting Related Relief [Docket No. 42]; and
  - b. Declaration of Thiago da Costa Silva In Support of the Debtor's Omnibus Reply to Opportunity's Objections to (I) the Debtor's Application to Retain Simpson Thacher and (II) the Debtor's Request for Approval of the Funding Agreement [Docket No. 97].
- ii. Response Deadline: Monday, December 8, 2025
- iii. Responses:

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.



- a. Limited Objection to Debtor's Motion for Entry of an Order Authorizing the Debtor to (I) Enter Into Funding Agreement, (II) Open Bank Accounts and (III) Granting Related Relief [Docket No. 84]; and
- b. Debtor's Omnibus Reply to Opportunity's Objections to (I) the Debtor's Application to Retain Simpson Thacher and (II) the Debtor's Request for Approval of the Funding Agreement [Docket No. 98].
- iv. <u>Status:</u> This matter will go forward on a contested basis.

## B. Authorization of Employment of Simpson Thacher as Counsel to the Debtor

- i. Related Documents:
  - a. Debtor's Application for Entry of an Order Authorizing the Employment of Simpson Thacher & Bartlett LLP as Counsel to the Debtor and Debtor in Possession, Effective as of the Petition Date [Docket No. 44]; and
  - b. Declaration of Thiago da Costa Silva In Support of the Debtor's Omnibus Reply to Opportunity's Objections to (I) the Debtor's Application to Retain Simpson Thacher and (II) the Debtor's Request for Approval of the Funding Agreement [Docket No. 97].
- ii. Response Deadline: Wednesday, December 10, 2025
- iii. Responses:
  - a. Opportunity's Objection to the Debtor's Application for Entry of an Order Authorizing the Employment of Simpson Thacher & Bartlett LLP as Counsel to the Debtor and Debtor in Possession, Effective as of the Petition Date [Docket No. 89]; and
  - b. Debtor's Omnibus Reply to Opportunity's Objections to (I) the Debtor's Application to Retain Simpson Thacher and (II) the Debtor's Request for Approval of the Funding Agreement [Docket No. 98].
- iv. <u>Status:</u> This matter will go forward on a contested basis.

# II. Witness and Exhibit Lists

- **A.** Debtor's Amended Witness and Exhibit List for the Hearings Scheduled on December 19, 2025 [Docket No. 99]; and
- **B.** Opportunity's Witness and Exhibit List for Hearing on December 19, 2025 at 10:00 [A].M. (Prevailing Central Time) [Docket No. 94].

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Respectfully submitted this 18th day of December 2025.

### **GRAY REED**

By: /s/ Jason S. Brookner

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- and -

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## PROPOSED COUNSEL TO THE DEBTOR

## **Certificate of Service**

I certify that on December 18, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner