Docket #0311 Date Filed: 08/07/2026

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

In re: Ambipar Emergency Response, Debtor.[1]	Chapter 11 Case No. 25-90524 (ARP)
In re: Ambipar Emergency Response, *et al.*[2] Debtors in a Foreign Proceeding.	Chapter 15 Case No. 25-90709 (ARP) (Jointly Administered)

MOTION TO SEAL EXHIBIT A TO
OPPORTUNITY'S MOTION TO COMPEL
(Relates to ECF No. 309)

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.

[1] The last four digits of the Debtor's taxpayer identification number are 0263. The Debtor's address is P.O. Box 10008, Willow House, Cricket Square, Grand Cayman, KY1-1001, Cayman Islands.

[2] The debtors in these chapter 15 cases (the "Chapter 15 Cases"), along with the last four digits of each Debtor's tax identification or corporate registry number, are: Ambipar Emergency Response (0263), Ambipar Lux S.à.r.l. (9448), Ambipar Participações e Empreendimentos S.A. (01-24), Environmental ESG Participações S.A. (01-23), and Emergência Participações S.A. (01-49). The location of the Debtors' corporate headquarters is Avenida Pacaembu, 1088, São Paulo, São Paulo, Brazil, 01234-0000.

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Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada ("Opportunity"), by and through its undersigned counsel, hereby files this Motion to Seal ("Motion") requesting entry of an Order, substantially in the form attached hereto (the "Proposed Order"), authorizing Opportunity to file under seal the unredacted version of Exhibit A (as defined herein), and respectfully states the following in support of this Motion:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and Opportunity confirms its consent to entry of a final order by the Court in connection with the Motion to the extent that it is later determined that the Court, absent consent, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue of these proceedings is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are sections 105(a) and 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rules 9013-1 and 9037-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules"), and the *Procedures for Complex Cases in the Southern District of Texas*.

BACKGROUND

4. On October 20, 2025, Debtor Ambipar Emergency Response filed its *Voluntary Petition for Non-Individuals Filing for Bankruptcy* ("Ambipar Chapter 11"), as amended [ECF Nos. 1 and 13] for relief under Chapter 11 of Title 11 of the United States Code, §§ 101 et seq. (the "Bankruptcy Code") in this Court, commencing the above-captioned case. The Debtor continues

to operate its business and manage its property as debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code.

5. On July 9, 2026, five other affiliated entities filed a *Chapter 15 Petition for Recognition of a Foreign Proceeding* ("Ambipar Chapter 15") [ECF No. 1] for relief under Chapter 11 of the Bankruptcy Code, commencing the above-captioned case. The cases are jointly administered under Case No. 26-90709-ARP pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1.

6. No official committee, trustee, or examiner has been appointed in the Ambipar Chapter 11 or Chapter 15 cases.

7. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 and Chapter 15 cases are set forth in the *Declaration of Thiago Da Costa Silva in Support of Chapter 11 Petition* [ECF No. 3] and the *Declaration of Thiago Da Costa Silva in Support of the Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code and Additional First Day Filings* [ECF No. 7] (collectively, the "First Day Declarations").

8. The Debtor and Opportunity are parties to that certain *Stipulation and Agreed Confidentiality and Protective Order Regarding Production of Documents* [ECF No. 160] (the "Protective Order") which governs the protection of documents and information that are confidential, sensitive, or private in nature from public disclosure and from use for any purpose other than in connection with these bankruptcy cases.

9. Substantially contemporaneously herewith, Opportunity is filing a *Motion to Compel* (the "Motion to Compel"), which discusses a confidential exhibit, Exhibit A, that contains

exhibits that were produced on an "attorneys eyes only" basis and falling under the purview of the Protective Order and thus required to be filed under seal (collectively, the "Sealed Exhibit").

RELIEF REQUESTED

10. By this Motion, Opportunity requests entry of an Order, substantially in the form attached hereto, authorizing it to file under seal the unredacted Sealed Exhibit. The entire Sealed Exhibit has been marked confidential such that filing a redacted version to comply with Bankruptcy Local Rule 9037-1 is impracticable.

BASIS FOR RELIEF

11. The relief requested herein is supported by sections 105(a) and 107(b) of the Bankruptcy Code. Under section 107(b) of the Bankruptcy Code, the Court is authorized to issue orders to protect entities with respect to certain confidential or commercially sensitive information. 11 U.S.C. § 107(b). Section 105(a) of the Bankruptcy Code codifies the Court's inherent equitable powers, and empowers the Court 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).

12. Bankruptcy Rule 9018 implements section 107(b) of the Bankruptcy Code and provides in relevant part: "On motion or on its own initiative, with or without notice, the court may 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, (2) to protect any entity against scandalous or defamatory matter contained in any paper filed in a case under the [Bankruptcy] Code[.]" Fed. R. Bankr. P. 9018. Furthermore, Bankruptcy Local Rule 9037-1 authorizes the Court to limit public access to certain documents.

13. Opportunity files this Motion requesting to seal the Sealed Exhibit referenced as "Exhibit A" in the Motion to Compel. By designating the relevant deposition testimony as

"confidential," counsel has taken the position that the Sealed Exhibit contains sensitive, non-public information, including the discussion of economic terms and negotiations surrounding the Restructuring Support Agreement. Public disclosure of this information would reveal confidential business terms and strategic relationships, which could disadvantage the parties to the Protective Order and impact the administration of these bankruptcy cases. Accordingly, the Sealed Exhibit constitutes "confidential commercial information" within the meaning of 11 U.S.C. § 107(b), and cause exists to maintain such information under seal to prevent harm to the parties.

14. Opportunity respectfully submits that sealing the Sealed Exhibit governed by the Protective Order balances the need for information by those parties who may need it as part of the bankruptcy process, while protecting the rights to privacy of parties involved in these bankruptcy cases.

15. Based upon the foregoing, Opportunity respectfully submits sufficient cause exists for the Court to permit the filing of the Sealed Exhibit under seal pursuant to section 107 of the Bankruptcy Code.

WHEREFORE, Opportunity respectfully requests entry of the Proposed Order substantially in the form submitted herewith granting the relief requested in this Motion and for such other and further relief as the Court deems just and proper.

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Dated: August 7, 2026

Respectfully submitted,

By: */s/ Jarrod B. Martin*

BRADLEY ARANT BOULT CUMMINGS LLP
Jarrod Martin
Michael Riordan
JPMorgan Chase Tower
600 Travis Street, Suite 5600
Houston, TX 77002
Telephone: (713) 576-0388
Emails: jbmartin@bradley.com
mriordan@bradley.com

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
Sarah Schrag (admitted *pro hac vice)*
1700 Broadway, 33rd Floor
New York, New York 10019
Telephone: (212) 257-6065
Facsimile: (212) 257-6050
Email: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

Counsel for Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada

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ORDER GRANTING MOTION TO SEAL
EXHIBIT A TO OPPORTUNITY'S MOTION TO COMPEL

Upon the motion (the "Motion")[3] of Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada ("Opportunity"), for entry of an order, pursuant to sections 105(a) and 107 of the Bankruptcy Code, and Local Rule 9037-1, authorizing it to file under seal the Sealed Exhibit; it appearing that cause exists to grant the relief requested in the Motion and pursuant to the Protective Order; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and this Court having found that venue

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[2] The debtors in these chapter 15 cases (the "Chapter 15 Cases"), along with the last four digits of each Debtor's tax identification or corporate registry number, are: Ambipar Emergency Response (0263), Ambipar Lux S.à.r.l. (9448), Ambipar Participações e Empreendimentos S.A. (01-24), Environmental ESG Participações S.A. (01-23), and Emergência Participações S.A. (01-49). The location of the Debtors' corporate headquarters is Avenida Pacaembu, 1088, São Paulo, São Paulo, Brazil, 01234-0000.

[3] Capitalized terms used by not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.

of this proceeding and the Motion in this District is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided; and after due deliberation; and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.

2. Opportunity is authorized to file the Sealed Exhibit under seal.

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.

Signed: _____, 2026

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ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE