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

In re: Ambipar Emergency Response, Debtor.	Chapter 11 Case No. 25-90524 (ARP)
In re: Ambipar Emergency Response, *et al.*[1] Debtors in a Foreign Proceeding.	Chapter 15 Case No. 26-90709 (ARP)

DEBTORS' [CORRECTED] EMERGENCY MOTION TO ENFORCE THE COURT'S AUGUST 13, 2026 ORDERS AND STRIKE PORTIONS OF OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA'S OBJECTIONS SET FORTH ON EXHIBIT A

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED AT THE HEARING ON THIS MATTER ON AUGUST 21, 2026, AT 9:00 AM (PREVAILING CENTRAL TIME).

IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST APPEAR AT THE HEARING IF ONE IS SET, OR FILE A WRITTEN RESPONSE PRIOR TO THE DATE THAT RELIEF IS REQUESTED IN THE PRECEDING PARAGRAPH. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

The Debtors in the above-captioned cases move to strike portions of (i) *Opportunity's Objection to Debtor Parties' Motion to Suspend and Dismiss the Debtor's Chapter 11 Case* [Ch. 11, No. 25-90524, Docket No. 342] (the "Suspension Objection"); (2) *Opportunity's Limited Objection to: Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign*

[1] The debtors in the above-captioned cases (the "Chapter 11 Case" and/or 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) ("AER"), 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) (collectively, "Debtors").

Representative and (III) Related Relief Under Chapter 15 of the Bankruptcy Code [Ch. 15, No. 26-90709, Docket No. 132] (the "Recognition Objection," and together with the Suspension Objection, the "Objections") set forth on Exhibit A, and preclude Opportunity *Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada* ("Opportunity") from presenting argument or evidence at the August 21, 2026 hearing regarding Opportunity, Victor Almeida or the matters covered by the quashed discovery requests. In support thereof, the Debtors state as follows:

PRELIMINARY STATEMENT

1. On August 11, 2026, this Court held a hearing on the *Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada to Produce (I) Documents and (II) Victor Almeida for a Deposition and In-Person Hearing Testimony* (the "Motion to Compel") [Ch. 11, No. 25-90524, Docket No. 99] [Ch. 15, No. 26-90709, Docket No. 308]. The Court denied the Debtors' request to depose Mr. Almeida but, as a condition of that ruling, the Court expressly precluded Opportunity from presenting "any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters."[2] The Court further precluded Opportunity from presenting testimony relating to matters covered by the quashed document requests. These rulings were memorialized in two orders entered on August 13, 2026 (the "Quashing Order" [Ch. 11, No. 25-90524, Docket No. 123] [Ch. 15, No. 26-90709, Docket No. 338] and the "Document Order" [Ch. 11, No. 25-90524, Docket No. 121] [Ch. 15, No. 26-90709, Docket 336], together, the "August 13 Orders").

[2] The contested matters before this Court are the *Debtor Parties' Motion to Suspend the Chapter 11 Case* [Ch. 11 No. 25-90524, Docket No. 254] (the "Suspension Motion") and 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* [Ch. 15, No. 26-90709, Docket No. 2] (the "Recognition Motion", and together with the Suspension Motion, the "Contested Matters").

2. Opportunity has flagrantly violated those orders. On August 14, 2026, one day after entry of the August 13 Orders, Opportunity filed the Objections, which are riddled with testimony and evidence "regarding Victor Almeida" and "relating to matters covered by" quashed document requests. The Objections detail Opportunity and Mr. Almeida's conduct and role at and with respect to Debtor AER, the very matters this Court precluded.

3. The remedy is straightforward. The Court should strike the portions of and exhibits in support of the Objections and preclude Opportunity from presenting argument or evidence on these matters at the August 21, 2026 hearing.

BACKGROUND

A. The Motion to Compel

4. On August 7, 2026, the Debtors filed the Motion to Compel. The Debtors sought Mr. Almeida's deposition because Opportunity's anticipated objections to the Contested Matters were expected to center on Mr. Almeida's conduct, votes, and role as an Opportunity-appointed director on AER's Board and the Debtors needed to cross-examine him on those issues.

5. On August 9, 2026, Opportunity filed an objection to the Motion to Compel [Ch. 11, No. 25-90524, Docket No. 104] [Ch. 15, No. 26-90709, Docket No. 316]. On August 10, 2026, Mr. Almeida, through his own counsel, filed a separate motion for protective order [Ch. 11, No. 25-90524, Docket No. 109] [Ch. 15, No. 26-90709, Docket No. 321]. Opportunity and Mr. Almeida both sought to quash the Debtors' notices of deposition and to preclude the Debtors from deposing or compelling Mr. Almeida's testimony among other relief.

B. The August 11, 2026 Hearing

6. On August 11, 2026, the Court held a hearing on the Motion to Compel. At the outset, the Court emphasized that the issues before it on the Contested Matters were narrow and limited to the standards under 11 U.S.C. §§ 305 and 1517. The Court stated: "What's not in front

of me is the merits of the RJ or what they're proposing to do . . . . So, when we're arguing the motions today, I really need for you to tether it to the standards in either, you know, 1517 or 305." Hr'g Tr. at 6:17–7:17, Aug. 11, 2026.

7. Notwithstanding the Court's admonition, Opportunity's counsel argued extensively about the merits of the contemplated restructuring transactions in Brazil, the transaction's alleged unfairness, and Mr. Almeida's conduct. The Court repeatedly pushed back on those merits arguments, stating: "I just don't want to jump ahead. I just want to, you know, tie us to the standard," Hr'g Tr. 15:6–7, Aug. 11, 2026, and "[W]e haven't gotten into the stadium yet to be able to discuss that. We're still, you know, can we walk in the door, that's where we are." Hr'g Tr. 22:8–10, Aug. 11, 2026. The Court's rulings addressed each category of argument at the hearing.

8. ***Mr. Almeida's Actions, Votes, and Fiduciary Duties.*** The Debtors' counsel argued that Mr. Almeida's conduct, including with respect to his votes and fiduciary duties, was relevant and sought to depose him on those issues. Opportunity and Mr. Almeida opposed the deposition, arguing these matters were irrelevant to the 305 and 1517 standards. The Court agreed with Opportunity on that point, ruling that it was "not going to allow the deposition at this time on the issues" and finding that "whether he breached his fiduciary duty, how he acted, in my mind, are not relevant to the 305 or 151[7] issues." Hr'g Tr. at 60:6–9, Aug. 11, 2026. The Court then imposed a reciprocal preclusion:

> [T]hat basically precludes any -- the affirmative use of any testimony on behalf of Mr. Almeida at the hearing. So, you know, you said he wasn't going to be -- you said he wasn't going to be brought in as a witness; therefore, any testimony regarding any action he took or anything like that, you know, unless the door is opened somehow, that's -- all that testimony is precluded . . . .

Hr'g Tr. 60:14–21.

9. ***Mr. Almeida's Role as "Non-Interested Director" and Alleged Veto Power.*** At the August 11 hearing, Debtors' counsel described Opportunity's position as asserting that Mr. Almeida was the sole non-interested director with veto rights over the Debtors' restructuring and that the Board's decision was invalid because Mr. Almeida did not consent. *See* Hr'g Tr. at 31:17–34:23, Aug. 11, 2026. Opportunity's counsel reiterated these themes, arguing that the Debtors entered into the RSA "without board approval" and in violation of a related-party transaction policy that "precludes exactly what's happening with the RSA." *Id.* at 28:1–9, 29:3–22. Indeed, Opportunity contended in its Objections that Mr. Almeida was the sole non-interested director with veto rights over the Debtors' restructuring and that the Board's decision was invalid absent his consent. *See, e.g.,* Suspension Objection ¶¶ 46, 60, 61. The Court made clear that its preclusion ruling extended to these arguments, stating that "it may mean some of the arguments that Mr. Lipkin made are precluded because I'm going to go ahead and grant that." Hr'g Tr. 60:21–23, Aug. 11, 2026.

10. ***The Almeida Letter.*** The Court also addressed the letter Mr. Almeida wrote to the Debtor's Board. The Court acknowledged that Mr. Almeida "did write that letter" and that it was "fairly detailed," but noted that since Opportunity indicated it was not bringing Mr. Almeida as a witness, the Court stated, "I don't know whether the letter gets in or not." Hr'g Tr. 45:1–3, Aug. 11, 2026. Opportunity's counsel confirmed that Opportunity was not going to bring Mr. Almeida in as a witness. *See* Hr'g Tr. 60:17–18, Aug. 11, 2026. Thus, the Court's preclusion of "any testimony regarding any action he took" necessarily encompasses the letter and written objections that document his actions. Hr'g Tr. 60:18–19, Aug. 11, 2026.

11. With respect to the document requests, the Court quashed certain of Debtors' requests to Opportunity and Mr. Almeida relating to communications concerning officers,

directors, and employees of the Debtors (Ch. 11 Request No. 4); assets, interests, liabilities, and geographic location (Ch. 11 Request No. 9); the Debtors' business activities (Ch. 15 Request No. 3); officers, directors, and employees of the Debtors (Ch. 15 Request No. 4); and the Debtors' creditors (Ch. 15 Request No. 5) but imposed a corresponding preclusion, stating that Opportunity could not "present[] any testimony" relating to those topics at the August 21, 2026 hearing. *See* Hr'g Tr. 62:12–14, Aug. 11, 2026.

C. The Court's August 13 Orders

12. On August 13, 2026, the Court entered two orders memorializing its rulings:

- The Quashing Order provides at Paragraph 4: "Opportunity is precluded from presenting any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters."
- The Document Order provides at Paragraph 3: "Opportunity is precluded from presenting any testimony relating to matters covered by Request Nos. 4 and 9 of the Debtor's First Set of Requests for Production of Documents served on Opportunity and Victor Almeida in the Chapter 11 Case (No. 25-90524), as well as by Request Nos. 3, 4, and 5 of the Debtors' First Set of Requests for Production of Documents served on Opportunity and Victor Almeida in the Chapter 15 Cases (No. 26-90709)."

13. Both orders were agreed as to form by counsel for Opportunity and counsel for Mr. Almeida.

D. Opportunity's August 14 Objections

14. On August 14, 2026, Opportunity filed the Objections. Despite the Court's express preclusion of "any testimony or evidence on behalf of or regarding Victor Almeida," the

Objections are replete with such testimony. The content falls into several categories:

- ***Direct References to Mr. Almeida's Actions, Votes, and Dissent.*** The Objections affirmatively invoke what Mr. Almeida did, his votes, his dissent, his written objection, as evidence supporting Opportunity's arguments.
- ***Arguments Premised on Mr. Almeida's Role as a "Non-Interested Member of the Board" and Veto Power.*** The Objections build their central authorization argument around Mr. Almeida's role as a purported non-interested director whose consent was required. This is the very argument Opportunity's counsel previewed at the August 11 hearing, and it falls within the Court's preclusion ruling. Certain portions of the authorization argument of the Suspension Objection constitute testimony "regarding" Mr. Almeida because the argument's conclusion that the RSA was unauthorized necessarily depend on Mr. Almeida's non-consent as the operative facts.
- ***The Almeida Letter and Related Communications.*** The Objections also rely on Mr. Almeida's written communications—the same letter the Court questioned whether it "gets in or not." Hr'g Tr. at 45:1–3, Aug. 11, 2026.

15. By way of example:

- ¶ 46 of the Suspension Objection identifies Mr. Almeida as Opportunity's appointed director and argues that the AER Board required his approval;
- ¶ 56 of the Suspension Objection states that Mr. Almeida "voted against" the Special Committee formation;
- ¶ 59 of the Suspension Objection states that the RSA was not "approved by the independent director appointed by Opportunity;"
- ¶ 59 of the Recognition Objection states the RPT Policy "precludes the Debtor from

entering transactions with related parties involving conflicts of interest unless there is unanimous support from the Response Board;"

- ¶ 60 of the Suspension Objection states the Board ratified the RSA "over the objection and dissent of Mr. Almeida;"
- ¶ 61 of the Suspension Objection details Mr. Almeida's grounds for objecting to the RSA ratification and cites to Mr. Almeida's Written Statement of Vote and Dissent (Poplinger Decl. Ex. 4 to the Objections);
- ¶ 62 of the Suspension Objection references and cites to the letter Opportunity sent to AER's counsel after Mr. Almeida's sent his Written Statement of Vote and Dissent (Poplinger Decl. Ex. 5 to the Objections);
- ¶ 63 of the Suspension Objection references AER's reply to Mr. Almeida's Written Statement of Vote and Dissent (Poplinger Decl. Ex. 6 to the Objections);
- ¶ 72 of the Recognition Objection states the RSA was executed "without the unanimous board support the RPT Policy requires and without meaningful independent oversight;" and
- ¶¶ 86–87 of the Suspension Objection conclude that the RSA required "the consent of the independent director appointed by Opportunity" which "did not occur."

JURISDICTION AND VENUE

16. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this District pursuant to 28 U.S.C. § 1409. The statutory predicates for the relief sought herein are Bankruptcy Local Rule 9013-1, and the Court's inherent authority under 11 U.S.C. § 105(a).

ARGUMENT

17. It is well settled that a bankruptcy court "plainly ha[s] jurisdiction to interpret and enforce its own prior orders." *Travelers Indem. Co. v. Bailey*, 557 U.S. 137, 151 (2009). The Supreme Court has further held that "where a court order's plain terms unambiguously apply, as they do here, they are entitled to their effect." *Id*. at 138; *see also Galaz v. Galaz (In re Galaz)*, 665 F. App'x 372, 375 (5th Cir. 2016) (noting that allowing a party to circumvent a prior ruling "would create an end run around the bankruptcy court's previous ruling"). The Court's inherent authority under 11 U.S.C. § 105(a) provides an independent basis to enforce compliance. Section 105(a) empowers the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of" the Bankruptcy Code, which necessarily encompasses the power to enforce the Court's own prior orders.

18. The application here is straightforward. As set forth above, the August 13 Orders unambiguously preclude Opportunity from "presenting any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters," Quashing Order ¶ 4, and from "presenting any testimony relating to matters covered by" the quashed discovery requests, Document Order ¶ 3. Opportunity's Objections violate both orders. The preclusion was the express quid pro quo for quashing the Almeida deposition and limiting Opportunity's discovery obligations. The failure to enforce the August 13 Orders is unduly prejudicial to the Debtors. Opportunity has shielded itself and Mr. Almeida from discovery while building its Objections around his conduct. Those portions of its Objections and exhibits set forth on Exhibit A should be stricken.

19. Emergency consideration is warranted. The hearing on the Contested Matters is scheduled for August 21, 2026. Unless the portions and exhibits are stricken at or before the hearing, Opportunity will continue to improperly present argument based on precluded testimony and evidence, in violation of this Court's orders.

CONCLUSION

20. The Debtors respectfully request that the Court grant this motion and enter an order: (i) striking the portions of Opportunity's submissions to the Court listed on Exhibit A; (ii) precluding Opportunity from presenting argument or evidence at the August 21, 2026 hearing regarding Victor Almeida or the matters covered by the quashed document requests; and (iii) granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 19th day of August 2026.

GRAY REED

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COUNSEL TO THE DEBTORS

CERTIFICATE OF SERVICE

I certify that on August 19, 2026, 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

EXHIBIT A

1. Paragraphs 5, 44–47, 52–54, 56, 59–63, and 74–87 of *Opportunity's Objection to Debtor Parties' Motion to Suspend and Dismiss the Debtor's Chapter 11 Case* [Ch. 11, No. 25-90524, Docket No. 342] (the "Suspension Objection");
2. Paragraphs 45–46, 59, and 72 of *Opportunity's Limited Objection to: Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [Ch. 15, No. 26-90709, Docket No. 132] (the "Recognition Objection");
3. Exhibit 4 to the Declaration of Andrew L. Poplinger in Support of the Suspension Objection [Ch. 11, No. 25-90524, Docket No. 346] (Draft Minutes of the July 15, 2026 Meeting of the Board of Ambipar Emergency Response ("AER"), attaching Mr. Almeida's Written Statement of Vote and Dissent);
4. Exhibit 5 to the Declaration of Andrew Poplinger in Support of the Suspension Objection [Ch. 11, No. 25-90524, Docket No. 346] (Opportunity's Letter to AER's Counsel dated July 23, 2026);
5. Exhibit 6 to the Declaration of Andrew L. Poplinger in Support of the Suspension Objection [Ch. 11, No. 25-90524, Docket No. 346] (AER's Reply to Mr. Almeida's Written Statement of Vote and Dissent dated July 24, 2026);
6. Exhibit 4 to the Declaration of Andrew L. Poplinger in Support of the Recognition Objection [Ch. 15, No. 26-90709, Docket No. 134] (Draft Minutes of the July 15, 2026 Meeting of the Board of AER, attaching Mr. Almeida's Written Statement of Vote and Dissent);

7. Exhibit 5 to the Declaration of Andrew L. Poplinger in Support of the Recognition Objection [Ch. 15, No. 26-90709, Docket No. 134] (Opportunity's Letter to AER's Counsel dated July 23, 2026); and
8. Exhibit 6 to the Declaration of Andrew L. Poplinger in Support of the Ch. 15 Objection [Ch. 15, No. 26-90709, Docket No. 134] (AER's Reply to Mr. Almeida's Written Statement of Vote and Dissent dated July 24, 2026).

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

In re: Ambipar Emergency Response, Debtor.	Chapter 11 Case No. 25-90524 (ARP)
In re: Ambipar Emergency Response, *et al.*[1] Debtors in a Foreign Proceeding.	Chapter 15 Case No. 26-90709 (ARP)

ORDER GRANTING DEBTORS' EMERGENCY MOTION TO ENFORCE THE COURT'S AUGUST 13, 2026 ORDERS AND STRIKE PORTIONS OF OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA'S OBJECTIONS SET FORTH ON EXHIBIT A

Upon consideration of the Debtors' Emergency Motion to Enforce the Court's August 13, 2026 Orders and Strike Portions of Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada's ("Opportunity's") Objections Set Forth on Exhibit A [Dkt. ___] (the "Motion"), and the arguments of counsel; and the Court having found that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) venue is proper pursuant to 28 U.S.C. § 1409; (iv) good and sufficient notice of the Motion was given; and (v) cause exists to grant the relief requested; it is HEREBY ORDERED THAT:

1. The Motion is GRANTED.

[1] The debtors in the above-captioned cases (the "Chapter 11 Case" and/or 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 Participances S.A. (01-23), and Emergência Participações S.A. (01-49) ("Debtors").

2. Paragraphs 5, 44–47, 52–54, 56, 59–63, and 74–87 of *Opportunity's Objection to Debtor Parties' Motion to Suspend and Dismiss the Debtor's Chapter 11 Case* [Ch. 11, No. 25-90524, Docket No. 342] (the "Suspension Objection") are hereby STRICKEN.

3. Paragraphs 45–46, 59, and 72 of *Opportunity's Limited Objection to: Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [Ch. 15, No. 26-90709, Docket No. 132] (the "Recognition Objection") are hereby STRICKEN.

4. The following exhibits to the Declaration of Andrew Poplinger in Support of the Suspension Objection are STRICKEN: Exhibit 4 (Draft Minutes of the July 15, 2026 Meeting of the Board of Ambipar Emergency Response ("AER"), attaching Mr. Almeida's Written Statement of Vote and Dissent), Exhibit 5 (Opportunity's Letter to AER's Counsel dated July 23, 2026), and Exhibit 6 (AER's Reply to Mr. Almeida's Written Statement of Vote and Dissent dated July 24, 2026).

5. The following exhibits to the Declaration of Andrew Poplinger in Support of the Recognition Objection are STRICKEN: Exhibit 4 (Draft Minutes of the July 15, 2026 Meeting of the Board of Ambipar Emergency Response ("AER"), attaching Mr. Almeida's Written Statement of Vote and Dissent), Exhibit 5 (Opportunity's Letter to AER's Counsel dated July 23, 2026), and Exhibit 6 (AER's Reply to Mr. Almeida's Written Statement of Vote and Dissent dated July 24, 2026).

6. Opportunity is precluded from presenting any argument or evidence at the hearing on August 21, 2026 regarding Victor Almeida or relating to matters covered by the two orders entered on August 13, 2026: the "Quashing Order" [Ch. 11, No. 25-90524, Docket No. 123]

[Ch. 15, No. 26-90709, Docket No. 338] and the "Document Order" [Ch. 11, No. 25-90524, Docket No. 121] [Ch. 15, No. 26-90709, Docket 336].

7. The Court retains jurisdiction to enforce and interpret this Order.

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge