Docket #0379 Date Filed: 08/20/2026

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

In re: Ambipar Emergency Response,[1] Debtor.	Chapter 11 Case No. 25-90524 (ARP)
In re: Ambipar Emergency Response, *et al.*[2] Debtors in a Foreign Proceeding.	Chapter 15 Case No. 26-90709 (ARP)

OPPORTUNITY'S OBJECTION TO DEBTORS' EMERGENCY MOTION TO ENFORCE THE COURT'S AUGUST 13, 2026 ORDERS AND STRIKE PORTIONS OF OPPORTUNITY'S OBJECTIONS

Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada ("**Opportunity**"), by and through its undersigned counsel, hereby files this Objection to the *Debtors' [Corrected] Emergency Motion to Enforce the Court's August 13, 2026 Orders and Strike Portions of Opportunity's Objections* [Ch. 11, Case No. 25-90524, Docket No. 363; Ch. 15, Case No. 26-90709, Docket No. 148] (the "**Motion to Strike**") and respectfully states as follows:

[1] The last four digits of the above-captioned Debtor's ("**AER**" or the "**Debtor**") taxpayer identification number are 0263. The Debtor's address is P.O. Box 10008, Willow House, Cricket Square, Grand Cayman, KY1-1001, Cayman Islands. The Debtor's service address in this Chapter 11 case is Avenida Angelica, no. 2346, 5th floor, Sao Paulo, SP 01228-200, Brazil.

[2] The debtors (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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PRELIMINARY STATEMENT

1. The Debtors' bad-faith, eleventh-hour Motion to Strike should be denied. It rests primarily on an order [Ch. 11, Case No. 25-90524, Docket No. 338; Ch. 15, Case No. 26-90709, Docket No. 123] (the "**Quashing Order**") that Opportunity never negotiated, never approved, and to which it never agreed. That order was drafted and approved exclusively by counsel to the Debtors and counsel to Victor Almeida—and the Quashing Order contains the very language Opportunity *specifically and successfully* demanded the Debtors *exclude* from the parallel order Opportunity *did* negotiate and approve [Ch. 11, Case No. 25-90524, Docket No. 336; Ch. 15, Case No. 26-90709, Docket No. 121] (the "**Document Order**"). Opportunity insisted the additional language be excluded because it deviates materially from this Court's instructions at the August 11, 2026 hearing. The Debtors now seek to enforce against Opportunity the broader preclusion language that Opportunity rejected—language that survived only because it was inserted into a separate order Opportunity had no reason to believe implicated Opportunity's rights, between the Debtors and Mr. Almeida's counsel alone. That is not enforcement of a prior ruling. It is an attempted end-run around what this Court actually said at the August 11, 2026 hearing.

2. The irregularities do not end there. The Quashing Order itself—the very filing the Debtors ask this Court to act upon—was docketed bearing the electronic signature of Opportunity's counsel without his authorization, implicit or explicit. That the Debtors would upload an order bearing another party's counsel's name without permission speaks volumes about the care—or lack thereof—with which they have approached these proceedings, and it is part of their broader pattern of overreach in an attempt to avoid the real issues and silence Opportunity.

3. The Quashing Order was originally drafted by Mr. Almeida's counsel to address a separate motion for protective order [Ch. 11, Case No. 25-90524, Docket No. 109; Ch. 15, Case

No. 26-90709, Docket No. 321] filed by Mr. Almeida. Moreover, the Court's oral ruling at the August 11 hearing concerning what was to be excluded addressed solely *testimony*—not evidence, not documents, and certainly not references to *undisputed*, material facts reflected in the Debtor's own corporate records. Opportunity's objections to the Suspension Motion and Recognition Motion do not offer or rely on Mr. Almeida's testimony, views, or opinions; they cite AER's own board minutes and governance documents to establish that the RSA lacked the unanimous director consent those documents require. The Debtors do not, and cannot, contest that vote.[3] And the fact that the Debtors go to such lengths to prevent the Court from understanding this issue betrays the Debtors' lack of confidence in their arugments.

4. The absurdity of the Debtors' position is laid bare by their own self-serving selectivity. If Opportunity is precluded from citing undisputed, material facts reflected in AER's own corporate documents merely because those documents reference Mr. Almeida and how he cast his votes as a director, then the Debtors should be equally precluded from relying on those same corporate documents as evidence that a majority of the Board approved the corporate actions at issue in the Contested Matters because AER's Chairman, Tercio Borlenghi, Jr. chaired the July 15, 2026 AER Board meeting and cast his vote in favor of those corporate actions. *See Debtors' Omnibus Reply to Objections to the Chapter 15 Recognition Motion and the Chapter 11 Suspension Motion* [Docket No. 161] (the "**Reply**") at ¶¶ 114, 116-17, and 122. In short, the Court denied Opportunity's motion to compel Mr. Borlenghi's deposition, yet the Debtors' Reply nonetheless relies on the actions he took. While that result would be equally unjustifiable, the Debtors must abide by the same rule they seek to impose on Opportunity.

[3] The Debtot does contest whether Mr. Almeida was a disinterested director, but that issue must be addressed in connection with the pending Suspension Motion, not the Motion to Strike.

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5. In any event, Opportunity does not rely on the truth of the matters asserted in Mr. Almeida's reasoning. Opportunity relies on the undisputed fact that the Debtor failed to obtain unanimous board consent—consent that was required under the Debtor's own governance documents. Mr. Almeida's *rationale* for voting "no" is irrelevant to whether his consent was required. All that matters is that Mr. Almeida is a non-interested director as defined in AER's Related Persons Transaction Policy by virtue of the fact he has no connection to the related parties in the Restructuring Support Agreement (the "**RSA**"). As noted, that issue is addressed in connection with the pending Suspension Motion.

RELEVANT BACKGROUND

6. On August 11, 2026, the Court held a hearing on the parties' motions to compel certain discovery and the depositions of Mr. Almeida and Mr. Borlenghi, along with the motion to quash the deposition of Mr. Almeida [Ch. 11, Case No. 25-90524, Docket Nos. 308, 309, and 321; Ch. 15, Case No. 26-90709, Docket Nos. 99, 100, and 109] filed by Opportunity, the Debtors, and Mr. Almeida, respectively. At that hearing, the Court stated that Opportunity was "precluded" from "the affirmative use of any testimony on behalf of Mr. Almeida at the hearing." Hr'g Tr. 60:14–23. The Court's ruling consistently and exclusively referenced "testimony." *See* also attached **Exhibit A**, wherein Debtors' counsel acknowledged this fact (Wendy Wu stated: "Judge Perez explicitly stated at yesterday's hearing that Opportunity was 'precluded' 'from presenting any testimony as to' the subject matter of the quashed RFPs.").

7. On August 13, 2026, the Court entered three orders: an order denying Opportunity's motion to compel Mr. Borlenghi's deposition [Ch. 11, Case No. 25-90524, Docket No. 337; Ch. 15, Case No. 26-90709, Docket No. 122] (the "**Borlenghi Order**"), the Document Order, and the Quashing Order.

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8. The Document Order was negotiated by Opportunity's counsel. In those negotiations, Opportunity specifically objected to language proffered by Debtors' counsel that would have precluded Opportunity from presenting "testimony *or evidence*." *See* attached **Exhibits B and C**, wherein Opportunity's counsel negotiated "or evidence" be stricken from the Document Order and Debtors' counsel agreed (Wendy Wu stated: "Thank you, Andy. We are amenable to your proposed change and will send out the agreed forms [refercing the attached Borlenghi Order and Document Order]."). Opportunity's counsel further correctly noted that "[t]hat is not what Judge Perez said" and proposed a redline removing "or evidence." **Exhibit B**. The Debtors' counsel accepted that change and dropped the reference to "evidence." **Exhibit C**. As entered, the Document Order at Paragraph 3 precludes Opportunity only from "presenting any **testimony** relating to matters covered by Request Nos. 4 and 9." (Emphasis added).

9. The Quashing Order, by contrast, was drafted, negotiated, and approved by Skadden, Arps, Slate, Meagher & Flom LLP ("**Skadden**")—counsel to Mr. Almeida, not counsel to Opportunity. Not only did Opportunity's counsel not draft, negotiate, or approve the Quashing Order, but all communications regarding the Quashing Order from Debtors' counsel were directed to Skadden. *See* attached **Exhibit A**, wherein Debtors' counsel presented changes to the Quashing Order *to Skadden* for their review (addressing "Hunter" at Skadden and mentioning that Skadden's signature block had been added). In fact, the first time Opportunity's counsel saw a draft of the Quashing Order, as expected, it did not contain any language directly relevant to Opportunity, including the following language upon which the Debtors now purport to rely, which their counsel later added without flagging it to Opportunity's counsel: "Opportunity is precluded from presenting any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters." *See* attached **Exhibit D**, wherein Skadden provided a draft to Debtors' counsel. Yet the

Quashing Order includes the broader language—"testimony *or evidence*"—that Opportunity had specifically and successfully negotiated to exclude from the Document Order. More egregious, though, is that *the Quashing Order bears Mr. Lipkin's signature on behalf of Opportunity, which signature was never implicitly or explicitly authorized*.[4]

10. On August 14, 2026, Opportunity filed its Objection to the Suspension Motion [Ch. 11, Case No. 25-90524, Docket No. 342] and its Objection to the Recognition Motion [Ch. 15, Case No. 26-90709, Docket No. 132].

11. On August 19, 2026—two days before the scheduled hearing—the Debtors filed the Motion to Strike, seeking to strike substantial portions of Opportunity's Objections and their supporting exhibits.

ARGUMENT

A. The Quashing Order Cannot Bind Opportunity Because Opportunity Never Negotiated or Authorized It

12. The Debtors' Motion to Strike is premised almost entirely on the Quashing Order's language purporting to preclude Opportunity from "presenting any testimony *or evidence* on behalf of or regarding Victor Almeida." But that order was not negotiated or approved by Opportunity's counsel. The email record shows it was drafted and circulated by Skadden (Mr. Almeida's counsel) (**Exhibit D**) at the express direction of the Court (Hr'g Tr. 60:24–61:2 (The Court specifically instructed that the Quashing Order "should just be very limited to, you know, quashing a deposition in connection with this contested matter only . . . .")). Thus, Opportunity's understanding that the Quashing Order would not implicate Opportunity directly was justied. In

[4] In fact, all previous documents Opportunity's counsel has signed in this case have been signed by Opportunity's Houston counsel at Bradley Arant Boult Cummings LLP. At least with the Document Order, which also bears Mr. Lipkin's electronic signature unbeknownst to Mr. Lipkin, Mr. Frischknecht at least gave explicit permission for the Document Order to be presented to the Court.

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fact, Mr. Andreas Frischknecht expressly stated that Skadden—not Chaffetz Lindsey—would respond to Debtors' counsel on the Almeida deposition. *See* **Exhibit A** ("Wendy, Regarding the proposed orders you circulated to us last night [*i.e.*, the Borlegnhi Order and the Document Order], we have no further comments beyond those you received from us around 10:00am this morning. I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition."). The unauthorized inclusion of Mr. Lipkin's signature cannot be justified and does not constitute Opportunity's assent.

13. Furthermore, the Document Order confirms the distinction. In the Document Order—the order Opportunity's counsel *did* negotiate—Opportunity specifically and successfully insisted on the removal of "or evidence" because, as Opportunity's counsel stated, that broader language "is not what Judge Perez said." The Debtors accepted that change. It is untenable for the Debtors to now rely on the very language ("or evidence") that Opportunity successfully excluded from the order it negotiated, by pointing to a different order that Opportunity did not negotiate and did not authorize.

B. The Court's Oral Ruling Was Limited to Testimony

14. The Court's statements at the August 11, 2026, hearing consistently referenced "testimony"—not "evidence." The Court stated:

> [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 (emphasis added).

15. The "or evidence" language in the Quashing Order at ¶ 4 goes beyond what the Court actually ruled from the bench. Where there is a conflict between the Court's oral ruling and

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a written order—particularly one not negotiated by the affected party—the oral ruling should control. The Debtors cannot recast a testimony-only ruling as a blanket prohibition on documents, corporate records, or legal argument.

C. Opportunity's Objections Did Not "Present" Evidence "Regarding Mr. Almeida"—They Merely Referenced AER's Own Documents Already in the Record

16. Even assuming *arguendo* that the Quashing Order's language were enforceable against Opportunity, the Motion to Strike still fails. Opportunity did not "present any testimony or evidence on behalf of or regarding Victor Almeida." It cited AER's own corporate records to make a legal argument about whether AER had authority to enter the RSA.

17. The documents the Debtors seek to strike—board minutes, Mr. Almeida's Written Statement of Vote and Dissent, correspondence regarding the RPT Policy—are corporate documents that form part of the Debtor's own corporate records. They do not become Opportunity's evidence "on behalf of" Mr. Almeida. Many of these documents were placed in the record by the Debtors themselves.

18. Opportunity's references to Mr. Almeida in its Objections arise exclusively in the context of corporate governance arguments—specifically, whether the RSA was properly authorized under the RPT Policy. The Quashing Order cannot reasonably be read as precluding Opportunity from challenging AER's corporate actions giving rise to the Contested Matters based on uncontested facts concerning the composition and actions of AER's own Board, and presenting AER's records to test AER's compliance is not presenting Mr. Almeida's views or "testimony or evidence on behalf of or regarding" him.

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D. The Motion to Strike Is an Improper Attempt to Silence Opportunity on the Eve of the Hearing

19. The Debtors are weaponizing an order Opportunity did not negotiate to seek to preclude Opportunity's meritorious substantive objections less than 48 hours before the hearing on the Contested Matters. Striking the identified paragraphs and exhibits would effectively eliminate Opportunity's corporate authorization argument—that the RSA violated the RPT Policy—which is one key basis for to its objections to both the Suspension Motion and the Recognition Motion.

20. The Court's preclusion ruling addressed whether Mr. Almeida would testify as a witness and whether his deposition would proceed. It was not intended to—and should not—prevent Opportunity from making legal arguments about corporate governance that necessarily reference undisputed, material facts.

21. Notably, the Debtors' own counsel, in accepting Opportunity's edit to the Document Order, stated: "We reserve all rights including with respect to the evidence submitted in support of your forthcoming objection." *See* attached **Exhibit E**, wherein both Opportunity's counsel and Debtors' counsel reserve all rights. This reservation confirms that the Debtors anticipated Opportunity would submit evidence and preserved their right to raise evidentiary objections at the hearing—the proper vehicle for any such dispute, rather than a blanket motion to strike.

E. The Debtor's Own Records Explicitly Identify Mr. Almeida as a "Non-Interested" Board Member in Essentially the Same Type of Transaction

22. The Debtors claim that "[t]he Objections build their central authorization argument around Mr. Almeida's role as a purported non-interested director whose consent was required." Motion to Strike at 7. They also state that "the Restructuring Transactions were approved by all

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AER board members, except Mr. Almeida[, a]nd, most importantly, they were approved by all non-interested board members." Reply at ¶ 113. It's incredibly disingenuous for the Debtors to make these claims when they have documents in their possession that show to the contrary.

23. Specifically, the Debtor's challenge to Mr. Almeida's status as a "non-interested" board member is contradicted by the Debtor's own corporate records, including the three written resolutions dated January 21, 2024 approving the Debtor's guarantee of the Green Notes. *See* attached **Exhibit F**. The third resolution in this set was passed specifically to satisfy Section I(a)(iv) of the Related Person Transaction Policy, which requires "the unanimous approval of all non-interested members of the Board" for related party transactions exceeding $5,000,000 for so long as Opportunity retains its board appointment right. Mr. Almeida executed that resolution on its signature page under the heading "Signed by all the non-interested Directors of the Company for the time being."

24. The AER Board very deliberately structured three separate instruments—with three distinct signatory groups—precisely to document which directors were "non-interested" for each governance purpose (*i.e.*, the audit, the full board, and the Related Persons Transaction Policy). Having formally designated Mr. Almeida as a "non-interested Director" when the Company required his approval to consummate the guarantee, the Debtor cannot now disavow that designation in an effort to strip him of the governance protections the Policy was designed to provide.

RELIEF REQUESTED

25. For the foregoing reasons, Opportunity respectfully requests that the Court deny the Motion to Strike in its entirety and, therefore, permit Opportunity's Objections to the

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Suspension Motion and Recognition Motion—including the AER corporate records and the governance arguments they support—to be considered in full at the August 21, 2026 hearing.

26. Opportunity reserves all rights, claims, and defenses, including the right to supplement.

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Dated: August 20, 2026

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ Michael Riordan
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

-and-

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
Sarah M. 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
s.schrag@chaffetzlindsey.com

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in these cases on August 20, 2026.

/s/ Michael Riordan
Michael Riordan

From:	Wu, Wendy S.
To:	Newell, Hunter B; Andreas Frischknecht; Davis, Abby; Scheffler, Michelle P; Mazza, Jr., James J; Alan Lipkin; Oliver Price; Sarah Schrag
Cc:	Friedman, Bryce L.; Zylberberg, David; Calheiros, Grenfel S; List-Ambipar-Lit; Allison Scott
Subject:	[External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)
Date:	Wednesday, August 12, 2026 2:28:12 PM
Attachments:	Proposed Order re Mr. Almeida"s Testimony (STB).docx Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (STB).docx Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (STB).docx Redline - Proposed Order re Mr. Almeida"s Testimony and Proposed Order re Mr. Almeida"s Testimony (STB).pdf Redline - Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (CL Edits) and Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (STB).pdf Redline - Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (CL edits) and Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Or.pdf

Thank you, Hunter. Please find attached our proposed version along with a redline.

We are fine with Chaffetz's proposed edits except for bullet point #3 in the draft order compelling Opportunity's document production. Judge Perez explicitly stated at yesterday's hearing that Opportunity was "precluded" "from presenting any testimony as to" the subject matter of the quashed RFPs. The suggested edit would improperly impose a limitation on the relief granted by the Court. Please find attached our proposed version.

I added Skadden's signature to the forms as well. Let us know if you have any further comments. We are happy to send these to chambers once agreed upon. Thank you.

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

From: Newell, Hunter B <Hunter.Newell@skadden.com>
Sent: Wednesday, August 12, 2026 1:53 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Please see the attached proposed order regarding Mr. Almeida's testimony.

Skadden has no additional comments on the other proposed orders.

Thanks,

Hunter B. Newell
Associate
Skadden, Arps, Slate, Meagher & Flom LLP
845 Texas Avenue, Suite 2300 | Houston | Texas | 77002-5026
T: +1.713.655.5125 | **F: +1.713.483.9125**
hunter.newell@skadden.com

From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:18 AM
To: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby (HOU) <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P (HOU) <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J (CHI) <James.Mazza@skadden.com>; Newell, Hunter B (HOU) <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: [Ext] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you very much, Andy.

Skadden team — I am attaching the proposed orders that we previously circulated with Chaffetz, which now include their edits. Please confirm whether you have any additional comments. We will consolidate and address all comments at once.

From: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>
Sent: Wednesday, August 12, 2026 12:06 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>

Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Regarding the proposed orders you circulated to us last night, we have no further comments beyond those you received from us around 10:00am this morning.

I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition.

Best regards,
Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:54 AM
To: abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>
Subject: [External] In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Counsel,

Please provide your proposed draft order on the motion to compel Victor Almeida's deposition and hearing testimony by 2:00 p.m. ET today, per Judge Perez's instructions at the conclusion of yesterday's hearing.

Chaffetz team, please confirm that you have no further comments on the draft order that Skadden

will circulate.

Best regards,
Wendy

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington AvenueS
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

ORDER QUASHING THE DEBTORS' NOTICES OF DEPOSITION TO VICTOR ALMEIDA AND DENYING DEBTORS' MOTION TO COMPEL VICTOR ALMEIDA FOR A DEPOSITION AND IN-PERSON HEARING TESTIMONY

Upon consideration of Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo De Investimento Em Participações Multiestratégia Responsabilidade Limitada ("Opportunity") to Produce (I) Documents and (II) Victor Almeida for a Deposition and In-Person Hearing Testimony (the "Motion to Compel"), Opportunity's Objection to Debtor's 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, Victor Almeida's Emergency Motion for

[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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49) (collectively, "Debtors").

Protective Order Pursuant to Federal Rule of Civil Procedure 26(c), and the arguments of counsel at the hearing held on August 11, 2026; it is HEREBY ORDERED THAT:

1. The Debtors' notices of deposition to Victor Almeida are quashed.

2. The Debtors' Motion to Compel is denied with respect to the testimony of Mr. Almeida concerning the Contested Matters[2] that are currently pending before the Court.

3. The order is without prejudice to any potential deposition of Victor Almeida other than in connection with the Contested Matters.

4. Opportunity is precluded from presenting any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters.

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

Signed: _____, 2026

_____
Alfredo R. Pérez
United States Bankruptcy Judge

[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").

AGREED AS TO FORM:

/s/ DRAFT

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
Moshe A. Fink (admitted *pro hac vice*)
Bryce Friedman (admitted *pro hac vice*)
Rachel L. Foust (admitted *pro hac vice*)
Zachary J. Weiner (admitted *pro hac vice*)
425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

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 COMPEL OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA TO PRODUCE DOCUMENTS

Upon consideration of (i) the Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada to Produce Documents (the "Emergency Motion to Compel"), (ii) Opportunity's Objection to Debtors' Emergency Motion to Compel, and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rules of Civil Procedure 26, 30, and 37 to compel the requested discovery; it is HEREBY ORDERED THAT:

1. The Debtors' Emergency Motion to Compel is GRANTED IN PART and DENIED IN PART.

2. By Friday, August 14, 2026, at 11pm Central Time, Opportunity shall produce all

[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).

documents and communications responsive to Request Nos. 1, 2, 3, 5, 6, 7, 8, and 10 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), and Request Nos. 1 and 2 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) (collectively, the "Compelled Requests"). Such production shall include, without limitation, all communications between Opportunity and Victor Almeida, all communications between Opportunity and any third parties, and all communications between Victor Almeida and any third parties, responsive to the Compelled Requests. Such production shall be made on a rolling basis.

3. Opportunity is precluded from presenting any testimony or evidence 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).

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
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Zachary J. Weiner (admitted *pro hac vice*)
425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone:(713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

ORDER QUASHING THE DEBTORS' NOTICES OF DEPOSITION TO VICTOR ALMEIDA AND DENYING DEBTORS' MOTION TO COMPEL VICTOR ALMEIDA FOR A DEPOSITION AND IN-PERSON HEARING TESTIMONY

Upon consideration of Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo De Investimento Em Participações Multiestratégia Responsabilidade Limitada ("Opportunity") to Produce (I) Documents and (II) Victor Almeida for a Deposition and In-Person Hearing Testimony (the "Motion to Compel"), Opportunity's Objection to Debtor's 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, Victor Almeida's Emergency Motion for

[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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49) (collectively, "Debtors").

Protective Order Pursuant to Federal Rule of Civil Procedure 26(c), and the arguments of counsel at the hearing held on August 11, 2026; it is HEREBY ORDERED THAT:

1. The Debtors' notices of deposition to Victor Almeida are quashed.

2. The Debtors' Motion to Compel is denied with respect to the testimony of Mr. Almeida concerning the Contested Matters[2] that are currently pending before the Court.

3. The order is without prejudice to any potential deposition of Victor Almeida other than in connection with the Contested Matters.

4. Opportunity is precluded from presenting any testimony or evidence on behalf of or regarding Victor Almeida in the Contested Matters.

~~3~~5. The Court retains jurisdiction to enforce and interpret this Order.

Signed: _____, 2026

_____

Alfredo R. Pérez
United States Bankruptcy Judge

[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").

AGREED AS TO FORM:

/s/ DRAFT

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New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

Summary report: **Litera Compare for Word 11.12.0.83 Document comparison done on 8/12/2026 5:11:36 PM**	
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Embedded Excel	0
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Total Changes:	8

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 (I) DENYING OPPORTUNITY'S EMERGENCY MOTION TO COMPEL DEPOSITION TESTIMONY OF TÉRCIO BORLENGHI JUNIOR AND (II) GRANTING DEBTORS' EMERGENCY MOTION FOR PROTECTIVE ORDER

Upon consideration of (i) Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada's ("Opportunity") Renewed Emergency Motion to Compel Deposition Testimony of Tércio Borlenghi Junior (the "Renewed Emergency Motion to Compel"), (ii) the Debtors' Opposition to Opportunity's Renewed Emergency Motion to Compel and Emergency Motion for Protective Order (the "Emergency Motion for Protective Order"), and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rule of Civil Procedure 26(c) to enter a protective order; it is HEREBY ORDERED THAT:

1. Opportunity's Renewed Emergency Motion to Compel is DENIED.

2. The Debtors' Emergency Motion for Protective Order 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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49).

3. Pursuant to Federal Rule of Civil Procedure 26(c)(1), Opportunity is precluded from deposing Tércio Borlenghi Junior in his personal capacity in connection with the Contested Matters (as defined in the Emergency Motion).

4. This Order is without prejudice to any potential deposition of Tércio Borlenghi Junior other than in connection with the Contested Matters.

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
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425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
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Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
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-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone:(713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

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 COMPEL OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA TO PRODUCE DOCUMENTS

Upon consideration of (i) the Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada to Produce Documents (the "Emergency Motion to Compel"), (ii) Opportunity's Objection to Debtors' Emergency Motion to Compel, and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rules of Civil Procedure 26, 30, and 37 to compel the requested discovery; it is HEREBY ORDERED THAT:

1. The Debtors' Emergency Motion to Compel is GRANTED IN PART and DENIED IN PART.

2. By Friday, August 14, 2026, at 11pm Central Time, Opportunity shall produce all

[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).

documents and communications responsive to Request Nos. 1, 2, 3, 5, 6, 7, 8, and 10 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), and Request Nos. 1 and 2 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) (collectively, the "Compelled Requests"). Such production shall include, without limitation, all communications between Opportunity and Victor Almeida, all communications between Opportunity and any third parties, and all communications between Victor Almeida and any third parties, responsive to the Compelled Requests. Such production shall be made on a rolling basis.

3. Opportunity is precluded from presenting any testimony or evidence ~~not produced in this Chapter 11 Case or Chapter 15 Cases~~ 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).

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

Signed: _____, 2026.

_____
Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

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Email: david.zylberberg@stblaw.com
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-and-

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Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

~~***Counsel to the Debtors***~~

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
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Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street

Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

Summary report: **Litera Compare for Word 11.12.0.83 Document comparison done on 8/12/2026 5:13:23 PM**	
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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 (I) DENYING OPPORTUNITY'S EMERGENCY MOTION TO COMPEL DEPOSITION TESTIMONY OF TÉRCIO BORLENGHI JUNIOR AND (II) GRANTING DEBTORS' EMERGENCY MOTION FOR PROTECTIVE ORDER

Upon consideration of (i) Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada's ("Opportunity") Renewed Emergency Motion to Compel Deposition Testimony of Tércio Borlenghi Junior (the "Renewed Emergency Motion to Compel"), (ii) the Debtors' Opposition to Opportunity's Renewed Emergency Motion to Compel and Emergency Motion for Protective Order (the "Emergency Motion for Protective Order"), and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rule of Civil Procedure 26(c) to enter a protective order; it is HEREBY ORDERED THAT:

1. Opportunity's Renewed Emergency Motion to Compel is DENIED.

[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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49).

2. The Debtors' Emergency Motion for Protective Order is GRANTED.

3. Pursuant to Federal Rule of Civil Procedure 26(c)(1), Opportunity is precluded from deposing Tércio Borlenghi Junior in his personal capacity in connection with the Contested Matters (as defined in the Emergency Motion).

4. This Order is without prejudice to any potential deposition of Tércio Borlenghi Junior other than in connection with the Contested Matters.

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

Signed: _____, 2026.

_____
Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

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Moshe A. Fink (admitted *pro hac vice*)
Bryce Friedman (admitted *pro hac vice*)
Rachel L. Foust (admitted *pro hac vice*)
Zachary J. Weiner (admitted *pro hac vice*)
425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

~~***Counsel to the Debtors***~~

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street

Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

Summary report: **Litera Compare for Word 11.12.0.83 Document comparison done on 8/12/2026 5:14:06 PM**	
Style name: STB Option 1	
Intelligent Table Comparison: Active	
Original filename: C:\Users\18421\OneDrive - stblaw.com\Desktop\Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (CL edits).docx	
Modified filename: C:\Users\18421\OneDrive - stblaw.com\Desktop\Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (STB).docx	
Changes:	
Add	14
~~Delete~~	0
~~Move From~~	2
Move To	2
Table Insert	0
~~Table Delete~~	0
Table moves to	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	18

From:	Andreas Frischknecht
To:	Wu, Wendy S.; Newell, Hunter B; Davis, Abby; Scheffler, Michelle P; Mazza, Jr., James J; Alan Lipkin; Oliver Price; Sarah Schrag
Cc:	Friedman, Bryce L.; Zylberberg, David; Calheiros, Grenfel S; List-Ambipar-Lit; Allison Scott
Subject:	RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)
Date:	Wednesday, August 12, 2026 4:05:41 PM
Attachments:	Redline - Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (STB vs CL).pdf Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (CL).docx

Wendy:

Regarding the open issue you've identified, as you note, Judge Perez stated Opportunity was "precluded" "from presenting any testimony as to" the matters identified in paragraph 3 of the proposed order.

But your proposed wording is far broader and would provide that "Opportunity is precluded from presenting any testimony or evidence relating to" the matters identified in paragraph 3. That is not what Judge Perez said.

As an alternative, we are prepared to accept the revised wording reflected in the attached PDF redline and clean Word version of the proposed order. We are happy for you to send this version to chambers, along with the proposed order in relation to the motions concerning Mr. Borlenghi's deposition, which appear to have been agreed already.

Best regards,
Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 5:26 PM
To: Newell, Hunter B <Hunter.Newell@skadden.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>

Subject: [External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you, Hunter. Please find attached our proposed version along with a redline.

We are fine with Chaffetz's proposed edits except for bullet point #3 in the draft order compelling Opportunity's document production. Judge Perez explicitly stated at yesterday's hearing that Opportunity was "precluded" "from presenting any testimony as to" the subject matter of the quashed RFPs. The suggested edit would improperly impose a limitation on the relief granted by the Court. Please find attached our proposed version.

I added Skadden's signature to the forms as well. Let us know if you have any further comments. We are happy to send these to chambers once agreed upon. Thank you.

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

From: Newell, Hunter B <Hunter.Newell@skadden.com>
Sent: Wednesday, August 12, 2026 1:53 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Please see the attached proposed order regarding Mr. Almeida's testimony.

Skadden has no additional comments on the other proposed orders.

Thanks,

Hunter B. Newell
Associate
Skadden, Arps, Slate, Meagher & Flom LLP
845 Texas Avenue, Suite 2300 | Houston | Texas | 77002-5026
T: +1.713.655.5125 | **F: +1.713.483.9125**
hunter.newell@skadden.com

From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:18 AM
To: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby (HOU) <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P (HOU) <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J (CHI) <James.Mazza@skadden.com>; Newell, Hunter B (HOU) <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: [Ext] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you very much, Andy.

Skadden team — I am attaching the proposed orders that we previously circulated with Chaffetz, which now include their edits. Please confirm whether you have any additional comments. We will consolidate and address all comments at once.

From: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>
Sent: Wednesday, August 12, 2026 12:06 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Regarding the proposed orders you circulated to us last night, we have no further comments beyond those you received from us around 10:00am this morning.

I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition.

Best regards,
Andy

Andreas Frischknecht | Partner
CHAFFETZ LINDSEY LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:54 AM
To: abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>
Subject: [External] In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Counsel,

Please provide your proposed draft order on the motion to compel Victor Almeida's deposition and hearing testimony by 2:00 p.m. ET today, per Judge Perez's instructions at the conclusion of yesterday's hearing.

Chaffetz team, please confirm that you have no further comments on the draft order that Skadden will circulate.

Best regards,
Wendy

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington AvenueS

New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

==========

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 COMPEL OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA TO PRODUCE DOCUMENTS

Upon consideration of (i) the Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada to Produce Documents (the "Emergency Motion to Compel"), (ii) Opportunity's Objection to Debtors' Emergency Motion to Compel, and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rules of Civil Procedure 26, 30, and 37 to compel the requested discovery; it is HEREBY ORDERED THAT:

1. The Debtors' Emergency Motion to Compel is GRANTED IN PART and DENIED IN PART.

2. By Friday, August 14, 2026, at 11pm Central Time, Opportunity shall produce all

[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).

documents and communications responsive to Request Nos. 1, 2, 3, 5, 6, 7, 8, and 10 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), and Request Nos. 1 and 2 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) (collectively, the "Compelled Requests"). Such production shall include, without limitation, all communications between Opportunity and Victor Almeida, all communications between Opportunity and any third parties, and all communications between Victor Almeida and any third parties, responsive to the Compelled Requests. Such production shall be made on a rolling basis.

3. Opportunity is precluded from presenting any testimony ~~or evidence~~ 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).

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
Moshe A. Fink (admitted *pro hac vice*)
Bryce Friedman (admitted *pro hac vice*)
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425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
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-and-

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Counsel to the Debtors

/s/ DRAFT

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
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Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
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-and-

BRADLEY ARANT BOULT CUMMINGS LLP
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Michael Riordan
JPMorgan Chase Tower
600 Travis Street
Suite 5600
Houston, TX 77002
Telephone: (713) 576-0388

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

Summary report: **Litera Compare Cloud 11.16.4.17 Document comparison done on 8/12/2026 10:56:13 PM**	
Style name: Standard	
Intelligent Table Comparison: Active	
Original filename: Proposed Order for Debtors' Mot. to Compel Opportunity's Discovery (STB).docx	
Modified filename: Proposed Order for Debtors' Mot. to Compel Opportunity's Discovery (CL).docx	
Changes:	
Add	0
~~Delete~~	1
~~Move From~~	0
Move To	0
Table Insert	0
~~Table Delete~~	0
Table moves to	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	1

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)

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ DRAFT

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
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Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
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-and-

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/s/ DRAFT

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Andreas A. Frischknecht (admitted *pro hac vice*)
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New York, NY 10019
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a.frischknecht@chaffetzlindsey.com

-and-

BRADLEY ARANT BOULT CUMMINGS LLP
Jarrod Martin
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JPMorgan Chase Tower
600 Travis Street
Suite 5600
Houston, TX 77002
Telephone: (713) 576-0388

Counsel to Opportunity

/s/ DRAFT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

From:	Wu, Wendy S.
To:	Andreas Frischknecht; Newell, Hunter B; Davis, Abby; Scheffler, Michelle P; Mazza, Jr., James J; Alan Lipkin; Oliver Price; Sarah Schrag
Cc:	Friedman, Bryce L.; Zylberberg, David; Calheiros, Grenfel S; List-Ambipar-Lit; Allison Scott
Subject:	[External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)
Date:	Thursday, August 13, 2026 6:23:32 AM
Attachments:	Proposed Order for Debtors" Mot. to Compel Opportunity"s Discovery (Agreed).docx Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (Agreed).docx

Thank you, Andy. We are amenable to your proposed change and will send out the agreed forms. We reserve all rights including with respect to the evidence submitted in support of your forthcoming objection.

From: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>
Sent: Wednesday, August 12, 2026 7:06 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy:

Regarding the open issue you've identified, as you note, Judge Perez stated Opportunity was "precluded" "from presenting any testimony as to" the matters identified in paragraph 3 of the proposed order.

But your proposed wording is far broader and would provide that "Opportunity is precluded from presenting any testimony or evidence relating to" the matters identified in paragraph 3. That is not what Judge Perez said.

As an alternative, we are prepared to accept the revised wording reflected in the attached PDF redline and clean Word version of the proposed order. We are happy for you to send this version to chambers, along with the proposed order in relation to the motions concerning Mr. Borlenghi's deposition, which appear to have been agreed already.

Best regards,
Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP

1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 5:26 PM
To: Newell, Hunter B <Hunter.Newell@skadden.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: [External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you, Hunter. Please find attached our proposed version along with a redline.

We are fine with Chaffetz's proposed edits except for bullet point #3 in the draft order compelling Opportunity's document production. Judge Perez explicitly stated at yesterday's hearing that Opportunity was "precluded" "from presenting any testimony as to" the subject matter of the quashed RFPs. The suggested edit would improperly impose a limitation on the relief granted by the Court. Please find attached our proposed version.

I added Skadden's signature to the forms as well. Let us know if you have any further comments. We are happy to send these to chambers once agreed upon. Thank you.

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

From: Newell, Hunter B <Hunter.Newell@skadden.com>
Sent: Wednesday, August 12, 2026 1:53 PM
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<a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
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Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Please see the attached proposed order regarding Mr. Almeida's testimony.

Skadden has no additional comments on the other proposed orders.

Thanks,

Hunter B. Newell
Associate
Skadden, Arps, Slate, Meagher & Flom LLP
845 Texas Avenue, Suite 2300 | Houston | Texas | 77002-5026
T: +1.713.655.5125 | **F: +1.713.483.9125**
hunter.newell@skadden.com

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Subject: [Ext] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you very much, Andy.

Skadden team — I am attaching the proposed orders that we previously circulated with Chaffetz, which now include their edits. Please confirm whether you have any additional comments. We will consolidate and address all comments at once.

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Wendy,

Regarding the proposed orders you circulated to us last night, we have no further comments beyond those you received from us around 10:00am this morning.

I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition.

Best regards,
Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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Subject: [External] In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Counsel,

Please provide your proposed draft order on the motion to compel Victor Almeida's deposition and hearing testimony by 2:00 p.m. ET today, per Judge Perez's instructions at the conclusion of yesterday's hearing.

Chaffetz team, please confirm that you have no further comments on the draft order that Skadden will circulate.

Best regards,
Wendy

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington AvenueS
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

==========

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 COMPEL OPPORTUNITY DINÂMICO FUNDO DE INVESTIMENTO EM PARTICIPAÇÕES MULTIESTRATÉGIA RESPONSABILIDADE LIMITADA TO PRODUCE DOCUMENTS

Upon consideration of (i) the Debtors' Emergency Motion to Compel Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada to Produce Documents (the "Emergency Motion to Compel"), (ii) Opportunity's Objection to Debtors' Emergency Motion to Compel, and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rules of Civil Procedure 26, 30, and 37 to compel the requested discovery; it is HEREBY ORDERED THAT:

1. The Debtors' Emergency Motion to Compel is GRANTED IN PART and DENIED IN PART.

2. By Friday, August 14, 2026, at 11pm Central Time, Opportunity shall produce all

[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).

documents and communications responsive to Request Nos. 1, 2, 3, 5, 6, 7, 8, and 10 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), and Request Nos. 1 and 2 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) (collectively, the "Compelled Requests"). Such production shall include, without limitation, all communications between Opportunity and Victor Almeida, all communications between Opportunity and any third parties, and all communications between Victor Almeida and any third parties, responsive to the Compelled Requests. Such production shall be made on a rolling basis.

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).

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ David R. Zylberberg

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
Moshe A. Fink (admitted *pro hac vice*)
Bryce Friedman (admitted *pro hac vice*)
Rachel L. Foust (admitted *pro hac vice*)
Zachary J. Weiner (admitted *pro hac vice*)
425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

GRAY REED
Jason S. Brookner (TX Bar No. 24033684)
Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone:(713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ Alan J. Lipkin

CHAFFETZ LINDSEY LLP
Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
New York, NY 10019
Telephone: (212) 257-6922
Emails: a.lipkin@chaffetzlindsey.com
a.frischknecht@chaffetzlindsey.com

-and-

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

Counsel to Opportunity

/s/ Abigail Elizabeth Davis

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
Emails: abigail.sheehan@skadden.com

James J. Mazza, Jr. (admitted *pro hac vice*)
320 S. Canal Street
Chicago, Illinois 60606
Telephone: (312) 407-0521
Emails: james.mazza@skadden.com

Counsel to Victor Almeida

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 (I) DENYING OPPORTUNITY'S EMERGENCY MOTION TO COMPEL DEPOSITION TESTIMONY OF TÉRCIO BORLENGHI JUNIOR AND (II) GRANTING DEBTORS' EMERGENCY MOTION FOR PROTECTIVE ORDER

Upon consideration of (i) Opportunity Dinâmico Fundo de Investimento em Participações Multiestratégia Responsabilidade Limitada's ("Opportunity") Renewed Emergency Motion to Compel Deposition Testimony of Tércio Borlenghi Junior (the "Renewed Emergency Motion to Compel"), (ii) the Debtors' Opposition to Opportunity's Renewed Emergency Motion to Compel and Emergency Motion for Protective Order (the "Emergency Motion for Protective Order"), and (iii) the arguments of counsel at the hearing held on August 11, 2026; and the Court having found that good cause exists under Federal Rule of Civil Procedure 26(c) to enter a protective order; it is HEREBY ORDERED THAT:

1. Opportunity's Renewed Emergency Motion to Compel is DENIED.

2. The Debtors' Emergency Motion for Protective Order 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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49).

3. Pursuant to Federal Rule of Civil Procedure 26(c)(1), Opportunity is precluded from deposing Tércio Borlenghi Junior in his personal capacity in connection with the Contested Matters (as defined in the Emergency Motion).

4. This Order is without prejudice to any potential deposition of Tércio Borlenghi Junior other than in connection with the Contested Matters.

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED AS TO FORM:

/s/ David R. Zylberberg

SIMPSON THACHER & BARTLETT LLP
David R. Zylberberg (admitted *pro hac vice*)
Nicholas E. Baker (admitted *pro hac vice*)
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425 Lexington Avenue
New York, NY 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: david.zylberberg@stblaw.com
nbaker@stblaw.com
bfriedman@stblaw.com
moshe.fink@stblaw.com
rachel.foust@stblaw.com
zachary.weiner@stblaw.com

-and-

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Lydia R. Webb (TX Bar No. 24083758)
1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
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Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

Counsel to the Debtors

/s/ Alan J. Lipkin

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Alan J. Lipkin (admitted *pro hac vice*)
Andreas A. Frischknecht (admitted *pro hac vice*)
1700 Broadway, 33rd Floor
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-and-

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

Counsel to Opportunity

/s/ Abigail Elizabeth Davis

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Abigail Elizabeth Davis
845 Texas Avenue, Suite 2300
Houston, Texas 77022
Telephone: (713) 655-5120
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Counsel to Victor Almeida

From:	Newell, Hunter B
To:	"Wu, Wendy S."; Andreas Frischknecht; Davis, Abby; Scheffler, Michelle P; Mazza, Jr., James J; Alan Lipkin; Oliver Price; Sarah Schrag
Cc:	Friedman, Bryce L.; Zylberberg, David; Calheiros, Grenfel S; List-Ambipar-Lit; Allison Scott
Subject:	[External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)
Date:	Wednesday, August 12, 2026 10:54:04 AM
Attachments:	Proposed Order re Mr. Almeida"s Testimony.docx

Wendy,

Please see the attached proposed order regarding Mr. Almeida's testimony.

Skadden has no additional comments on the other proposed orders.

Thanks,

Hunter B. Newell
Associate
Skadden, Arps, Slate, Meagher & Flom LLP
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Thank you very much, Andy.

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I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition.

Best regards,
Andy

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Chaffetz Lindsey llp
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+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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Subject: [External] In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Counsel,

Please provide your proposed draft order on the motion to compel Victor Almeida's deposition and hearing testimony by 2:00 p.m. ET today, per Judge Perez's instructions at the conclusion of yesterday's hearing.

Chaffetz team, please confirm that you have no further comments on the draft order that Skadden will circulate.

Best regards,
Wendy

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington AvenueS
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

==========

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

ORDER QUASHING THE DEBTORS' NOTICES OF DEPOSITION TO VICTOR ALMEIDA AND DENYING DEBTORS' MOTION TO COMPEL VICTOR ALMEIDA FOR A DEPOSITION AND IN-PERSON HEARING TESTIMONY

Upon consideration of 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"), Opportunity's Objection to Debtor's 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, Victor Almeida's Emergency Motion for Protective Order

[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 Participações S.A. (01-23), and Emergência Participações S.A. (01-49) (collectively, "Debtors").

Pursuant to Federal Rule of Civil Procedure 26(c), and the arguments of counsel at the hearing held on August 11, 2026; it is HEREBY ORDERED THAT:

1. The Debtors' notices of deposition to Victor Almeida are quashed.

2. The Debtors' Motion to Compel is denied with respect to the testimony of Mr. Almeida concerning the Contested Matters[2] that are currently pending before the Court.

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

Signed: _____, 2026

_____
Alfredo R. Pérez
United States Bankruptcy Judge

[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").

From: Andreas Frischknecht
To: Wendy S. Wu
Cc: Hunter B Newell; Abby Davis; Michelle P Scheffler; James J Mazza Jr.; Alan Lipkin; Oliver Price; Sarah Schrag; Bryce L. Friedman; David Zylberberg; Grenfel S Calheiros; List-Ambipar-Lit; Allison Scott
Subject: Re: [External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)
Date: Thursday, August 13, 2026 6:29:50 AM

Thank you, Wendy. For the avoidance of doubt, Opportunity likewise reserves all rights.

Andreas Frischknecht | Partner
Chaffetz Lindsey llp
+1 212 257 6965 (Direct) +1 917 443 4896 (Cell)

On Aug 13, 2026, at 9:23 AM, Wu, Wendy S. <Wendy.Wu@stblaw.com> wrote:

Thank you, Andy. We are amenable to your proposed change and will send out the agreed forms. We reserve all rights including with respect to the evidence submitted in support of your forthcoming objection.

From: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>
Sent: Wednesday, August 12, 2026 7:06 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy:

Regarding the open issue you've identified, as you note, Judge Perez stated Opportunity was "precluded" "from presenting any testimony as to" the matters identified in paragraph 3 of the proposed order.

But your proposed wording is far broader and would provide that "Opportunity is precluded from presenting any testimony or evidence relating to" the matters identified in paragraph 3. That is not what Judge Perez said.

As an alternative, we are prepared to accept the revised wording reflected in the attached PDF redline and clean Word version of the proposed order. We are happy for you to send this version to chambers, along with the proposed order in relation to the motions concerning Mr. Borlenghi's deposition, which appear to have been agreed already.

Best regards,
Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 5:26 PM
To: Newell, Hunter B <Hunter.Newell@skadden.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: [External] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you, Hunter. Please find attached our proposed version along with a redline.

We are fine with Chaffetz's proposed edits except for bullet point #3 in the draft order compelling Opportunity's document production. Judge Perez explicitly stated at yesterday's hearing that Opportunity was "precluded" "from presenting any testimony as to" the subject matter of the quashed RFPs. The suggested edit would improperly impose a limitation on the relief granted by the Court. Please find attached our proposed version.

I added Skadden's signature to the forms as well. Let us know if you have any further comments. We are happy to send these to chambers once agreed upon. Thank you.

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

From: Newell, Hunter B <Hunter.Newell@skadden.com>
Sent: Wednesday, August 12, 2026 1:53 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Please see the attached proposed order regarding Mr. Almeida's testimony.

Skadden has no additional comments on the other proposed orders.

Thanks,

Hunter B. Newell
Associate
Skadden, Arps, Slate, Meagher & Flom LLP
845 Texas Avenue, Suite 2300 | Houston | Texas | 77002-5026
T: +1.713.655.5125 | **F: +1.713.483.9125**
hunter.newell@skadden.com

From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:18 AM
To: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Davis, Abby (HOU) <Abigail.Sheehan@skadden.com>; Scheffler, Michelle P (HOU) <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J (CHI) <James.Mazza@skadden.com>; Newell, Hunter B (HOU) <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: [Ext] RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Thank you very much, Andy.

Skadden team — I am attaching the proposed orders that we previously circulated with Chaffetz, which now include their edits. Please confirm whether you have any additional comments. We will consolidate and address all comments at once.

From: Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>
Sent: Wednesday, August 12, 2026 12:06 PM
To: Wu, Wendy S. <Wendy.Wu@stblaw.com>; abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>; Allison Scott <a.scott@chaffetzlindsey.com>
Subject: RE: In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

*** External Email ***

Wendy,

Regarding the proposed orders you circulated to us last night, we have no further comments beyond those you received from us around 10:00am this morning.

I understand Skadden will be responding to your inquiry concerning the motions to compel and for a protective order regarding Mr. Almeida's deposition.

Best regards,

Andy

Andreas Frischknecht | Partner
Chaffetz Lindsey LLP
1700 Broadway, 33rd Floor, New York, NY 10019
+1 212 257 6965 (Direct) | +1 917 443 4896 (Mobile)
andreas.frischknecht@chaffetzlindsey.com | www.chaffetzlindsey.com

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From: Wu, Wendy S. <Wendy.Wu@stblaw.com>
Sent: Wednesday, August 12, 2026 11:54 AM
To: abigail.sheehan@skadden.com; Scheffler, Michelle P <Michelle.Scheffler@skadden.com>; Mazza, Jr., James J <James.Mazza@skadden.com>; Newell, Hunter B <Hunter.Newell@skadden.com>; Alan Lipkin <a.lipkin@chaffetzlindsey.com>; Andreas Frischknecht <a.frischknecht@chaffetzlindsey.com>; Oliver Price <o.price@chaffetzlindsey.com>; Sarah Schrag <s.schrag@chaffetzlindsey.com>
Cc: Friedman, Bryce L. <bfriedman@stblaw.com>; Zylberberg, David <David.Zylberberg@stblaw.com>; Calheiros, Grenfel S <GCalheiros@stblaw.com>; List-Ambipar-Lit <List-Ambipar-Lit@lists.stblaw.com>
Subject: [External] In re Ambipar Emergency Response (Case Nos. 25-90524 & 26-90709)

Counsel,

Please provide your proposed draft order on the motion to compel Victor Almeida's deposition and hearing testimony by 2:00 p.m. ET today, per Judge Perez's instructions at the conclusion of yesterday's hearing.

Chaffetz team, please confirm that you have no further comments on the draft order that Skadden will circulate.

Best regards,
Wendy

Wendy S. Wu
Simpson Thacher & Bartlett LLP
425 Lexington AvenueS
New York, NY 10017

T: +1-212-455-3488
M: +1-832-242-8840
wendy.wu@stblaw.com

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

==========

<Proposed Order for Debtors' Mot. to Compel Opportunity's Discovery (Agreed).docx>
<Proposed Order for Opp. to Renewed Mot. to Compel and Emergency Mot. for a Protective Order (Agreed).docx>

Exhibit F

Filed Under Seal Pursuant to Protective Order Designations