Docket #0383 Date Filed: 08/20/2026

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

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

THE DEBTORS' COUNTER-DESIGNATIONS AND OBJECTIONS

The above-captioned debtors (collectively, the "Debtors") hereby make the following deposition counter-designations and objections.

COUNTER-DESIGNATIONS[2]

Tiago Silva Aug. 3 Depo Tr.		
No.	**Start**	**Stop**
1	17:5	17:12
2	17:21	18:8
3	18:12	18:14
4	18:20	19:25
5	23:11	23:24
6	42:20	43:8
7	44:18	45:6
8	51:13	52:21
9	53:24	54:5
10	58:21	59:4
11	59:18	60:18

[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' counter-designations are marked in blue highlight in the accompanying deposition transcripts. The designations made by the objecting parties are in yellow highlight.

12	60:23	61:17
13	80:18	80:20
14	80:25	81:14
15	108:19	109:5
16	129:10	129:13
17	141:18	142:19
18	149:15	149:22
19	155:23	156:12
20	163:21	164:6
21	167:9	168:2
22	170:4	170:17
23	170:23	170:25
24	184:18	184:19
25	192:25	193:6
26	193:24	193:25
27	195:23	196:7
28	217:5	217:9
29	225:5	225:25
30	227:11	229:3

David Mack Aug. 6 Depo Tr.		
No.	**Start**	**Stop**
1	22:8	22:17
2	23:21	24:19
3	25:20	25:23
4	49:12	49:24
5	56:16	56:24
6	58:12	60:17
7	62:19	63:4
8	66:2	66:4
9	67:18	67:23
10	73:22	73:25
11	80:5	80:8
12	88:23	90:13
13	91:17	92:2
14	92:14	92:16
15	104:5	104:16
16	108:12	108:18
17	113:18	114:2
18	115:15	116:19
19	124:18	125:16
20	132:24	134:3
21	135:22	136:2
22	136:18	137:9

23	140:3	140:13
24	142:10	142:22
25	149:24	150:7
26	153:22	154:12

Gustavo Salgueiro Aug. 20 Depo Tr.		
No.	**Start**	**Stop**
1	17:13	18:4
2	20:17	22:5
3	25:7	26:25
4	30:7	31:11
5	38:8	38:8
6	39:23	40:6
7	40:25	41:7
8	43:8	43:14
9	46:18	47:18
10	49:10	49:14
11	54:20	55:5
12	58:11	59:23
13	60:14	61:8
14	65:2	65:15
15	76:5	77:2
16	77:13	77:25
17	81:7	82:22

OBJECTIONS[3]

Gustavo Salgueiro August 13, 2026			
No.	**Start**	**Stop**	**Objection**
1	19:23	20:16	Outside the Scope of the Declaration, Legal Conclusion
2	22:6	22:25	Outside the Scope of the Declaration, Legal Conclusion
3	23:2	23:15	Outside the Scope of the Declaration, Legal Conclusion
4	32:14	32:20	Outside the Scope of the Declaration, Legal Conclusion, Speculation
5	37:20	38:14	Form, Outside the Scope of the Declaration
6	42:16	42:24	Outside the Scope of the Declaration
7	43:15	43:22	Speculation, Vague, Outside Scope of the Declaration
8	43:23	44:2	Speculation, Vague
9	44:3	44:19	Form, Speculation
10	44:20	45:7	Privilege, Form
11	48:7	48:12	Outside Scope of the Declaration
12	49:17	49:24	Outside Scope of the Declaration
13	52:6	52:19	Form, Outside the Scope of the Declaration
14	62:14	63:3	Form, Outside the Scope of the Declaration
15	63:9	64:3	Form, Legal Conclusion

David Mack August 6, 2026			
No.	**Start**	**Stop**	**Objection**
1	17:17	18:2	Form, Calls for Legal Conclusion
2	19:18	20:21	Privileged Information, Lack of Personal Knowledge
3	20:24	21:8	Asked and Answered
4	26:6	27:25	Pending Motion in Limine [Dkt. 124]
5	30:10	30:14	Pending Motion in Limine [Dkt. 124]
6	30:24	31:10	Form, Vague
7	32:2	33:6	Pending Motion in Limine [Dkt. 124]
8	40:9	41:3	Pending Motion in Limine [Dkt. 124]
9	43:2	47:20	Privileged Information
10	54:2	54:18	Compound Question, Privileged Information
11	70:21	71:4	Form, Vague

[3] The Debtors have filed the *Corrected Emergency Motion to Enforce the Court's August 13, 2026 Orders and Strike Portions of Opportunity Dinamico Fundo de Investimento em Participacoes Multiestrategia Responsabilidade Limitada's Objections Set Forth on Exhibit A Filed by Debtor Ambipar Emergency Response*, which would preclude Opportunity from making the substance of its objections. No. 26-90709 [Docket No. 148]. The Debtors reassert and do not waive their objections to Opportunity's arguments and evidence. To preserve their rights in the event the Court considers this argument from Opportunity, Debtors have counter-designated certain deposition testimony in the interest of efficiency.

12	73:17	73:21	Form, Leading Question
13	75:7	76:6	Calls for Legal Conclusion
14	76:12	76:16	Form, Ambiguous
15	84:15	84:19	Form, Compound Question
16	99:18	100:3	Form, Mischaracterization
17	141:2	141:6	Privileged Information
18	154:13	155:12	Asked and answered
19	159:5	159:15	Form, Compound Question

Thiago da Costa Silva August 3, 2026			
No.	**Start**	**Stop**	**Objection**
1	13:22	14:9	Form
2	14:25	15:16	Lack of Foundation, Form, Vague
3	53:15	54:8	Form, Vague
4	54:13	54:25	Form
5	86:6	86:25	Form, Vague
6	101:12	101:18	Form, Compound Question
7	101:25	102:10	Form, Vague and Ambiguous
8	102:11	103:15	Privileged Information
9	137:24	138:6	Lack of Foundation, Vague
10	138:21	138:25	Argumentative
11	144:18	145:10	Form, Vague, Leading Question
12	145:17	146:13	Vague, Ambiguous, Leading Question
13	148:3	148:9	Vague
14	149:6	149:9	Argumentative
15	153:9	153:12	Form, Vague
16	153:19	153:24	Form, Vague
17	156:13	156:19	Form, Vague
18	158:2	158:5	Form, Vague, Confusing
19	168:18	168:19	Form
20	168:25	169:3	Form, Vague
21	169:17	169:25	Form, Misstates Testimony
22	172:21	173:6	Form, Vague, Calls for Legal Conclusion
23	175:9	175:45	Legal Conclusion, Speculation
24	181:2	181:7	Form, Relevance, Vague
25	183:17	184:17	Harassing, Misstates Testimony, Relevance
26	192:6	192:15	Speculation, Vague
27	192:16	192:24	Form
28	196:12	196:16	Calls for Legal Conclusion
29	196:17	196:19	Vague
30	216:8	216:9	Form, Vague
31	216:21	217:4	Pending Motion in Limine [Dkt. 124]

RESERVATION OF RIGHTS

The Debtors reserve the right to supplement, modify, amend, or withdraw these designations and objections prior to the hearing on August 21, 2026, in whole or in part, in accordance with applicable rules, by agreement of the parties, or as authorized by the Court. The Debtors further reserve the right to designate additional counter-designations in response to designations offered by other parties.

Respectfully submitted this 20th day of August 2026.

GRAY REED

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

- and -

SIMPSON THACHER & BARTLETT LLP
Bryce L. Friedman (admitted *pro hac vice*)
David R. Zylberberg (admitted *pro hac vice*)
Noah Gimbel (admitted *pro hac vice*)
Rachael L. Foust (admitted *pro hac vice*)
425 Lexington Avenue
New York, New York 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: bfriedman@stblaw.com
david.zylberberg@stblaw.com
noah.gimbel@stblaw.com
rachael.foust@stblaw.com

Counsel to the Debtors

Certificate of Service

I certify that on August 20th, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason S. Brookner
Jason S. Brookner

Exhibit A

TO BE PRODUCED PURSUANT TO PROTECTIVE ORDER DOCKET NO. 160

Exhibit B

TO BE PRODUCED PURSUANT TO PROTECTIVE ORDER DOCKET NO. 160

Exhibit C

TO BE PRODUCED PURSUANT TO PROTECTIVE ORDER DOCKET NO. 160