Docket #0388 Date Filed: 08/21/2026

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)

EMERGENCY MOTION TO SEAL OMNIBUS REPLY TO OBJECTIONS TO THE CHAPTER 15 RECOGNITION MOTION AND THE CHAPTER 11 SUSPENSION MOTION, DEBTORS' DEPOSITION DESIGNATIONS, AND DEBTORS' WITNESS AND EXHIBIT LIST FOR AUGUST 21, 2026, HEARING

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN AUGUST 21, 2026.

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

The above-captioned debtors (collectively, the "Debtors") respectfully state as follows:

RELIEF REQUESTED

1. By this Motion, the Debtors seek the entry of an order from this Court, substantially in the form attached hereto (the "Order"), authorizing them to file under seal the unredacted version of the Debtors' Omnibus Reply to Objections to the Chapter 15 Recognition Motion and the

[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).

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Chapter 11 Suspension Motion [Chapter 15 Cases, Docket No. 159; Chapter 11 Case Docket No. 371] (the "Reply"), the Debtors' deposition designations, counter designations, and objections, including the exhibits attached thereto (the "Deposition Designations and Accompanying Exhibits") [Chapter 15 Cases, Docket Nos.171-172; Chapter 11 Case, Docket Nos. 384-385], and the Debtors' Witness and Exhibit List, including the exhibits attached thereto (the "Witness and Exhibit List and Accompanying Exhibits") [Chapter 15 Cases, Docket No. 175; Chapter 11 Case Docket No. 387], in connection with the hearing on August 21, 2026. (the "Hearing"), because the Reply, the Deposition Designations and Accompanying Exhibits, and Witness and Exhibit List and Accompanying Exhibits reference, discuss, and contain confidential information that has been designated either "Confidential" or "Highly Confidential – Attorney Eyes Only" under the *Stipulation and Agreed Confidentiality and Protective Order Regarding Production of Documents* [Docket No. 160] (the "Protective Order").

2. The Debtors have made two contemporaneous filings on the docket: (a) a public filing containing a redacted version of the Reply, with confidential portions withheld from public view; and (b) a sealed filing containing the complete, unredacted version of the Reply filed under seal. The Debtors have served copies of the unredacted Reply on counsel for all Objecting Parties.

3. The Debtors have made contemporaneous filings on the docket: (a) a public filing containing slip sheets in lieu of the Deposition Designations and Accompanying Exhibits; and (b) a sealed filing containing the complete, unredacted version of the Deposition Designations and Accompanying Exhibits under seal. The Debtors have served copies of the unredacted Deposition Designations and Accompanying Exhibits on counsel for all Objecting Parties.

4. The Debtors have made contemporaneous filings on the docket of (a) a public filing containing a redacted version of the Witness and Exhibit List and slipsheets in lieu of

Accompanying Exhibits designated Confidential or Highly Confidential under the Protective Order, and (b) a sealed filing containing the complete, unredacted version of the Witness and Exhibit List and Accompanying Exhibits. The Debtors will serve copies of the unredacted Witness and Exhibit List and Accompanying Exhibits on counsel for all Objecting Parties.

JURISDICTION AND VENUE

5. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b).

6. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The bases for the relief requested herein are sections 105(a) and 107(b) of Title 11 of the United States Code (the "Bankruptcy Code"), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9037-1 of the Bankruptcy Local Rules for the Southern District of Texas.

BACKGROUND

8. On October 20, 2025, Ambipar Emergency Response commenced a case under Chapter 11 of the Bankruptcy Code in this Court (Case No. 25-90524 (ARP)). On July 9, 2026, the Debtors commenced cases under Chapter 15 of the Bankruptcy Code in this Court (Case No. 26-90709 (ARP)). In connection with the commencement of the Chapter 15 cases, the Debtors filed their Recognition Motion and Suspension motion on July 9, 2026, which will be heard at the Hearing.

9. The Reply, the Deposition Designations and Accompanying Exhibits, and the Witness and Exhibit List and Accompanying Exhibits reference or comprise deposition testimony, corporate governance matters, intercompany transactions, RSA negotiations, and related

confidential information that has been designated as either "Confidential" or "Highly Confidential – Attorney Eyes Only" under the Protective Order. The Reply contains confidential commercial information regarding the Debtors' financing arrangements, corporate governance, and other sensitive business matters.

BASIS FOR RELIEF

10. Section 107(b) of the Bankruptcy Code, in relevant part, provides courts with the power to issue orders that protect entities from potential harm that may result from the disclosure of certain confidential information:

> On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may—
>
> > (1) protect an entity with respect to a trade secret or confidential research, development, or commercial information . . . .

11 U.S.C. § 107(b)(1); *see also* Fed. R. Bankr. P. 9018.

11. Unlike its counterpart in Rule 26(c) of the Federal Rules of Civil Procedure, Section 107(b) of the Bankruptcy Code does not require an entity seeking such protection to demonstrate "good cause." *See Video Software Dealers Ass'n v. Orion Pictures Corp. (In re Orion Pictures Corp.)*, 21 F.3d 24, 28 (2d Cir. 1994); *Phar-Mor, Inc. v. Defendants Named Under Seal (In re Phar-Mor, Inc.)*, 191 B.R. 675, 679 (Bankr. N.D. Ohio 1995). Instead, if the material sought to be protected satisfies one of the categories identified in Section 107(b), "the court is *required* to protect a requesting interested party and has no discretion to deny the application." *In re Orion Pictures Corp.*, 21 F.3d at 27 (emphasis in original); *Wyndham Vacation Resorts, Inc. v. Faucett (In re Faucett)*, 438 B.R. 564, 568 (Bankr. W.D. Tex. 2010).

12. Bankruptcy Rule 9018 implements Section 107(b) and provides that "[o]n motion or on its own, the court may, with or without notice, issue any order that justice requires to: (1) to protect the estate or any entity regarding a trade secret or other confidential research, development,

or commercial information." Fed. R. Bankr. P. 9018. Bankruptcy Local Rule 9037-1 further authorizes this Court to limit public access to certain documents.

13. Here, the Reply, the Deposition Designations and Accompanying Exhibits, and Witness and Exhibit List and Accompanying Exhibits reference or comprise deposition testimony, corporate board deliberations, intercompany transactions, RSA negotiations, and other confidential matters. Public disclosure of this information would reveal confidential business terms, internal deliberations, and strategic relationships that could disadvantage the parties and impact the administration of these bankruptcy cases. The information constitutes "confidential commercial information" within the meaning of 11 U.S.C. § 107(b). The Debtors submit that good cause exists to file the unredacted Reply, the Deposition Designations and Accompanying Exhibits, and Witness and Exhibit List under seal.

Emergency Consideration

14. The Debtors respectfully request emergency consideration of this Motion, as protection is necessary before the hearing on August 21, 2026, as outlined in this Motion.

Notice

15. The Debtors will provide notice of this Motion to any party that receives notice through the Court's Electronic Case Filing (CM/ECF) system. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Debtors respectfully request that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted this 21st day of August 2026.

GRAY REED

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Counsel to the Debtors

Certificate of Service

I certify that on August 21, 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

IN THE UNITED STATES BANKRUPTCY COURT
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HOUSTON DIVISION

In re: Ambipar Emergency Response, Debtor.	Chapter 11 Case No. 25-90524 (ARP)
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ORDER AUTHORIZING THE DEBTORS TO FILE OMNIBUS REPLY TO OBJECTIONS TO THE CHAPTER 15 RECOGNITION MOTION AND THE CHAPTER 11 SUSPENSION MOTION AND DEBTORS' WITNESS AND EXHIBIT LIST AND ACCOMPANYING EXHIBITS FOR AUGUST 21, 2026, HEARING UNDER SEAL

Upon the motion of the above-captioned debtors (collectively, the "Debtors") for entry of an order authorizing the Debtors to file the Reply[2] and Witness and Exhibit List and Accompanying Exhibits under seal; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue for this proceeding and the motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having

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[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

found good cause for the relief requested in the Motion; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Debtors are authorized to file the Reply under seal on the terms set forth in the Motion.

2. The Debtors are authorized to file the Witness and Exhibit List and Accompanying Exhibits under seal on the terms set forth in the Motion.

3. The Debtors are authorized to file the Deposition Designations and Accompanying Exhibits under seal on the terms set forth in the Motion.

4. The confidential information contained therein shall remain confidential and under seal.

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

6. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

Alfredo R. Pérez
United States Bankruptcy Judge