Docket #0422 Date Filed: 10/05/2026

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

In re	)	Chapter 11
Ambipar Emergency Response,[1]	)	Case No. 25-90524 (ARP)
Debtor in a Foreign Proceeding.	)	**Re: Docket Nos. 254, 417**

NOTICE OF ORDER SUSPENDING THE CHAPTER 11 CASE

PLEASE TAKE NOTICE that on September 28, 2026, this Court published its *Memorandum Opinion Granting Debtors' Motion for (I) Recognition of Foreign Main Proceeding and (II) Motion to Suspend the Chapter 11 Case* [Docket No. 417] (the "**Memorandum Opinion**") granting the *Motion for Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative and (III) Related Relief under Chapter 15 of the Bankruptcy Code*, Case No. 26-90709 (Bankr. S.D. Tex. July 9, 2026) [Docket No. 2] (the "**Recognition Motion**") and *Debtor Parties' Motion to Suspend the Chapter 11 Case* [Docket No. 254] (the "**Suspension Motion**").

PLEASE TAKE FURTHER NOTICE this Court requested in its Memorandum Opinion that the Debtors settle orders incorporating the Court's decision within seven (7) days.

PLEASE TAKE FURTHER NOTICE that counsel for the Debtors and the Ad Hoc Group of Financial Creditors worked in good faith since the filing of this Court's Memorandum Opinion to settle orders incorporating its decision but, ultimately, did not reach agreement on terms that accurately reflect this Court's decision and are consistent with the relief that the Debtors' sought under chapters 11 and 15 of the Bankruptcy Code.

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

PLEASE TAKE FURTHER NOTICE that the proposed order granting the Suspension Motion (the "**Proposed Suspension Order**") is attached hereto as **Exhibit A**. A redline comparing the Debtors' proposed order granting the Suspension Motion (the "**Debtors' Proposed Suspension Order**") [Docket No. 421] is attached hereto as **Exhibit B**.

[*Remainder of page intentionally left blank*]

Dated: October 5, 2026
Houston, Texas

Respectfully submitted,

/s/ Charles R. Koster

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Counsel to the Ad Hoc Group of Financial Creditors

CERTIFICATE OF SERVICE

I certify that on October 5, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Proposed Suspension Order

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

In re:	)	Chapter 11
AMBIPAR EMERGENCY RESPONSE,	)	Case No. 25-90524 (ARP)
Debtor.[1]	)	

ORDER SUSPENDING THE CHAPTER 11 CASE

Upon the Debtor Parties' Motion to Suspend the Chapter 11 Case (the "Motion")[2] pursuant to sections 305(a)(2) and (b), 349(b), and 1529(4) of the Bankruptcy Code and the principles of cooperation and comity of chapter 15 of the Bankruptcy Code, in favor of the chapter 15 case of the Debtor commenced by the Foreign Representative at Case No. 26-90709 (ARP) (the "Chapter 15 Case"); and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having entered an order granting recognition of the recuperação judicial proceeding in Brazil (the "RJ Proceeding") as a foreign main proceeding for the Debtor in the Chapter 15 Case pursuant to chapter 15 of the Bankruptcy Code; and no trustee, examiner, or statutory committee having been appointed in the Chapter 11 Case; and it appearing that the purposes of chapter 15 of the Bankruptcy Code, as set forth in 11 U.S.C. § 1501(a), would be best served by suspension of the Chapter 11 Case, as set forth in the Motion; and it appearing that cause exists to leave standing, upon suspension, all orders entered in

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[2] Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

the Chapter 11 Case; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and a hearing, if any, having been held to consider the relief requested in the Motion; and the objections to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause exists for the relief granted herein as set forth in the Memorandum Opinion; and the Court having determined that the relief set forth herein is in the best interests of the Debtor and its estate and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.

2. The Chapter 11 Case is hereby suspended, without prejudice, pursuant to sections 305(a)(2) and 1529(4) of the Bankruptcy Code, and may be dismissed by the Court upon a separate motion of the Debtor, subject to notice and a hearing, as provided under the Bankruptcy Code.

3. Unless otherwise provided herein, all orders entered in the Chapter 11 Case shall survive and remain in full force and effect upon the suspension of the Chapter 11 Case.

4. The Chapter 11 Case shall remain open solely for the hearing and determination of (i) final applications for the allowance of professional fees and any other administrative expenses in the Chapter 11 Case pursuant to sections 330 and 331 of the Bankruptcy Code (or otherwise), (ii) authorization by the Court related to the Debtor's use, sale, or lease of property of the estate outside of the ordinary course of business pursuant to section 363(b)(1) of the Bankruptcy Code, and (iii) any motions by parties in interest seeking to un-suspend the Chapter 11 Case.

5. Final fee applications and any other requests for the payment of administrative expenses in the Chapter 11 Case shall be filed and served within thirty (30) days of the Completion Date, and the Debtor shall promptly provide notice of said deadline.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules, the Bankruptcy Local Rules, and the *Procedures for Complex Cases in the Southern District of Texas* are satisfied by such notice.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. In the event of any conflicts between the Motion and this Order, the terms of this Order shall control.

8. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

9. The Debtor is authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.

10. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: _____, 2026

_____
Alfredo R. Pérez
United States Bankruptcy Judge

Exhibit B

Redline of the Proposed Suspension Order

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

In re:	)	Chapter 11
AMBIPAR EMERGENCY RESPONSE,	)	Case No. 25-90524 (ARP)
Debtor.[1]	)	

ORDER SUSPENDING THE CHAPTER 11 CASE

Upon the Debtor Parties' Motion to Suspend the Chapter 11 Case (the "Motion")[2] pursuant to sections 305(a)(2) and (b), 349(b), and 1529(4) of the Bankruptcy Code and the principles of cooperation and comity of chapter 15 of the Bankruptcy Code, in favor of the chapter 15 case of the Debtor commenced by the Foreign Representative at Case No. 26-90709 (ARP) (the "Chapter 15 Case"); and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having entered an order granting recognition of the recuperação judicial proceeding in Brazil (the "RJ Proceeding") as a foreign main proceeding for the Debtor in the Chapter 15 Case pursuant to chapter 15 of the Bankruptcy Code; and no trustee, examiner, or statutory committee having been appointed in the Chapter 11 Case; and it appearing that the purposes of chapter 15 of the Bankruptcy Code, as set forth in 11 U.S.C. § 1501(a), would be best served by suspension of the Chapter 11 Case, as set forth in the Motion; and it appearing that ~~the interests of creditors in the~~

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[2] Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

~~United States are not prejudiced or inconvenienced by suspension; and it appearing that~~ cause exists ~~(i) to limit the effects of dismissal under Bankruptcy Code § 349(b) and (ii)~~ to leave standing, upon suspension ~~and ultimate dismissal~~, all orders entered in the Chapter 11 Case; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and a hearing, if any, having been held to consider the relief requested in the Motion; and the objections to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause exists for the relief granted herein as set forth in the Memorandum Opinion; and the Court having determined that the relief set forth herein is in the best interests of the Debtor and its estate and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.

2. The Chapter 11 Case is hereby suspended, without prejudice, pursuant to sections 305(a)(2) and 1529(4) of the Bankruptcy Code, and ~~shall~~may be dismissed~~, without prejudice, following the occurrence of each of the following events: (i) the Completion Date and (ii) the Court's entry of orders in respect of final fee applications or orders for the payment of administrative expenses~~ by the Court upon a separate motion of the Debtor, subject to notice and a hearing, as provided ~~below~~under the Bankruptcy Code.

3. ~~Notwithstanding section 349 of the Bankruptcy Code and unless~~Unless otherwise provided herein, all orders entered in the Chapter 11 Case shall survive and remain in full force and effect upon the suspension~~, and ultimate dismissal,~~ of the Chapter 11 Case.

4. ~~This case~~The Chapter 11 Case shall remain open solely for ~~(a)~~ the hearing and

determination of (i) final applications for the allowance of professional fees and any other administrative expenses in the Chapter 11 Case pursuant to sections 330 and 331 of the Bankruptcy Code (or otherwise) ~~and (b) consideration of any motions to unsuspend~~, (ii) authorization by the Court related to the Debtor's use, sale, or lease of property of the estate outside of the ordinary course of business pursuant to section 363(b)(1) of the Bankruptcy Code, and (iii) any motions by parties in interest seeking to un-suspend the Chapter 11 Case.

5. Final fee applications and any other requests for the payment of administrative expenses in the Chapter 11 Case shall be filed and served within thirty (30) days of the Completion Date, and the Debtor shall promptly provide notice of said deadline.

~~6. This Order and the suspension of the Chapter 11 Case shall not limit the rights available to the parties in the Chapter 15 Case.~~

6. ~~7.~~ Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules, the Bankruptcy Local Rules, and the *Procedures for Complex Cases in the Southern District of Texas* are satisfied by such notice.

7. ~~8.~~ The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. In the event of any conflicts between the Motion and this Order, the terms of this Order shall control.

8. ~~9.~~ All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

9. ~~10.~~ The Debtor is authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.

10. ~~11.~~ This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: ~~October [●]~~ _____, 2026

Alfredo R. Pérez
United States Bankruptcy Judge