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Attorneys for Eleanor Fisher, as Petitioner and Foreign Representative

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Olinda Star Ltd. (In Provisional Liquidation),¹

Debtor in a Foreign Proceeding.

Case No. 22-11447 (MG)

Chapter 15

)

The Debtor in this Chapter 15 case, and the last four identifying digits of the tax number of the jurisdiction in which it pays taxes, is Olinda Star Ltd. (In Provisional Liquidation) (BVI – 9761).

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MOTION PURSUANT TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2002(M) AND (Q) AND 9007 FOR ORDER SCHEDULING EVIDENTIARY HEARING AND APPROVING FORM AND MANNER OF SERVICE OF NOTICE

Eleanor Fisher (the "Petitioner" or the "Foreign Representative"), in her capacity as the duly-authorized foreign representative of the provisional liquidation proceeding (the "BVI Proceeding") of Olinda Star Ltd. (In Provisional Liquidation) ("Olinda") pending in the BVI Commercial Court (the "BVI Court") pursuant to section 170 of the BVI Insolvency Act, 2003 (as amended, the "BVI Insolvency Act") of the laws of the British Virgin Islands ("BVI"), by and through her undersigned counsel, respectfully submits this motion (this "**Motion**") for entry of an order substantially in the form annexed hereto as **Exhibit A** (the "**Proposed Order**") (i) scheduling December 9, 2022 at 2:00 p.m. (ET) (the "Recognition and Enforcement Hearing Date") as the evidentiary hearing (the "Recognition and Enforcement Hearing") on the relief sought in the Petitioner's Declaration and Verified Petition for Recognition of the BVI Proceeding and Motion for Requesting Additional Relief (the "Verified Petition")² [ECF No. 2] and the Form of Voluntary Petition [ECF No. 1] (together, the "Petitions"), (ii) setting December 2, 2022 at 4:00 p.m. (ET) as the deadline by which any responses or objections to the Verified Petition must be filed with the Court and received by Olinda (the "Objection Deadline"), (iii) approving the form and manner of notice of the Petitions, Recognition and Enforcement Hearing Date, and Objection Deadline (the "Notice Procedures"), including the form of notice (the "Recognition and Enforcement Hearing Notice") that is attached as **Exhibit 1** to the Proposed Order, (iv) granting related relief as provided herein, and (v) granting such other relief as the Court deems just and proper. In support of this Motion, the Petitioner respectfully represents as follows:

² Capitalized terms used but not otherwise defined shall have the meanings ascribed to such them in the Verified Petition.

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JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference dated January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11*, 12 Misc. 00032 (S.D.N.Y. Feb. 2, 2012) (Preska, C.J.). Venue is proper in this Court pursuant to 28 U.S.C. § 1410.

BACKGROUND

2. The relevant factual background with respect to the relief sought in this Motion is set forth in the Verified Petition. The Court may find therein a description of the BVI Proceeding, the scheme of arrangement approved by the BVI Court with respect to Olinda (the "Scheme"), Olinda, and Olinda's activities, business, corporate and capital structures, and the circumstances leading to the commencement of the BVI Proceeding.

RELIEF REQUESTED

3. By this Motion, the Petitioner seeks the entry of an order, substantially in the form of the Proposed Order annexed hereto as <u>Exhibit A</u>, (i) setting December 9, 2022 at 2:00 p.m. (ET) as the Recognition and Enforcement Hearing Date, (ii) setting December 2, 2022 at 4:00 p.m. (ET) as the Objection Deadline, (iii) approving the Notice Procedures, including the Recognition and Enforcement Hearing Notice attached to the Proposed Order as <u>Exhibit 1</u>, (iv) granting related relief as provided herein, and (v) granting such other and further relief as the Court deems just and proper.

BASIS FOR RELIEF

4. Rule 2002(q)(1) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") provides that the parties identified therein (together with certain other parties, all as identified in <u>Exhibit B</u> annexed hereto (the "Chapter 15 Notice Parties")) and "such other

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entities as the Court may direct" must be given at least 21 days' notice of the hearing on the Verified Petition. Fed. R. Bankr. P. 2002(q)(1). Bankruptcy Rules 2002(m) and 9007 provide, among other things, that when notice is to be given under the Bankruptcy Rules, the Court shall designate the form and manner in which such notice shall be given (provided the Bankruptcy Rules do not otherwise specify the appropriate form and manner of such notice). Fed. R. Bankr. P. 2002(m), 9007.

5. The Petitioner proposes to (i) serve (a) the Recognition and Enforcement Hearing Notice, (b) the Petitions and (c) the *Declaration of Grant Carroll Pursuant to 28 U.S.C. § 1746* (without exhibits) (the "**Carroll Declaration**") (collectively, the "**Notice Documents**") by U.S. mail, first-class postage prepaid, upon the Chapter 15 Notice Parties, in accordance with Bankruptcy Rules 2002(k) and (q) and Rules 2002-1, 9006-1(b) and 9013-1(b) of the Local Bankruptcy Rules for the Southern District of New York (the "**Local Rules**").³ The Petitioner will complete service of such notice within two (2) Business Days of entry of the Proposed Order and respectfully submits that such notice constitutes adequate and sufficient notice of this Chapter 15 Case, the relief sought in the Petitions, the time fixed for filing objections to such relief, and the time, date, and place of the Recognition and Enforcement Hearing.⁴

6. Accordingly, the Petitioner respectfully requests that this Court approve the foregoing Notice Procedures pursuant to Bankruptcy Rules 2002(m) and (q) and 9007 and publication of the Recognition and Enforcement Hearing Notice pursuant to Bankruptcy Rule 2002(*l*).

³ Parties who receive notice by email in connection with *In re Serviços de Petróleo Constellation S.A.*, 18-13952 (MG) (Bankr. S.D.N.Y.) will receive the notice described herein by email rather than first class mail.

⁴ The Petitioner will also serve the Proposed Order on the Chapter 15 Notice Parties once such order is entered by the Court.

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7. Bankruptcy Rule 1012(b) provides, among other things, that a party objecting to a chapter 15 petition must present such objection no later than seven days before the date set for the hearing on the petition. Fed. R. Bankr. P. 1012(b). In light of this requirement, the Petitioner respectfully submits that setting (i) December 9, 2022 at 2:00 p.m. (ET) as the Recognition and Enforcement Hearing Date and (ii) December 2, 2022 at 4:00 p.m. (ET) as the Objection Deadline is appropriate.

8. Section 1514(c) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") provides that when notice of the commencement of a case under the Bankruptcy Code is given to foreign creditors, such notification shall indicate the time period and place for filing proofs of claim as well as whether such filing is necessary for secured creditors. 11 U.S.C. § 1514(c). It is generally accepted, however, that section 1514 does not apply in a chapter 15 ancillary case. As explained in Collier on Bankruptcy, section 1514 is the "last in a series of sections dealing with the international aspects of cases under chapters other than chapter 15 that began with section 1511." 8 Alan N. Resnick & Henry J. Sommer, COLLIER ON BANKRUPTCY ¶ 1514.01 (16th ed. rev. 2016) (emphasis added). As such, courts routinely find inapplicable and/or waive the requirements of section 1514 in chapter 15 cases. See, e.g., In re Oi S.A., Case No. 16-11791 (SHL) (Bankr. S.D.N.Y. June 22, 2016), ECF No. 21; In re OAS S.A., Case No. 15-10937 (SMB) (Bankr. S.D.N.Y. Apr. 17, 2015), ECF No. 24. Given that section 1514(c) does not apply with respect to this Chapter 15 Case (as the Petitioner has not sought to commence a case under any other chapter of the Bankruptcy Code), the Petitioner respectfully submits that the requirements contained therein are inapplicable or, alternatively, respectfully requests that such requirements be waived by this Court.

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NOTICE

9. Notice of this Motion will be provided to the Chapter 15 Notice Parties enumerated in **Exhibit B** annexed hereto.

NO PRIOR REQUEST

10. No previous request for the relief requested herein has been made by the Petitioner to this Court or any other court.

CONCLUSION

11. WHEREFORE, the Petitioner respectfully requests that this Court: (i) enter an order, substantially in the form of the Proposed Order annexed hereto as **Exhibit A**, granting the relief requested herein; and (ii) grant such other and further relief as the Court may deem just and proper.

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Dated: November 2, 2022 New York, New York

Respectfully submitted,

WHITE & CASE LLP

By: <u>/s/ John K. Cunningham</u> John K. Cunningham

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Attorneys for Eleanor Fisher, as Petitioner and Foreign Representative

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<u>Exhibit A</u>

Proposed Order

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Olinda Star Ltd. (In Provisional Liquidation),¹

Debtor in a Foreign Proceeding.

Case No. 22-11447 (MG)

Chapter 15

ORDER PURSUANT TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2002(M) AND (Q) AND 9007 SCHEDULING EVIDENTIARY HEARING AND <u>APPROVING FORM AND MANNER OF SERVICE OF NOTICE</u>

Upon the Petitioner's *Motion Pursuant to Federal Rules of Bankruptcy Procedure 2002(m) and (q) and 9007 for Order Scheduling Evidentiary Hearing and Approving Form and Manner of Service of Notice* (the "**Motion**"),² requesting, in her capacity as the duly-authorized Foreign Representative of the BVI Proceeding of Olinda Star Ltd. (In Provisional Liquidation), the entry of this order (this "**Order**") (i) scheduling the Recognition and Enforcement Hearing on the relief sought in the Petitions, (ii) scheduling the Objection Deadline; (iii) approving the Notice Procedures, including the form of Recognition and Enforcement Hearing Notice; (iv) granting related relief as provided in the Motion; and (v) granting such other and further relief as the Court deems just and proper; and the Court having considered the Motion; and the Court having found good cause for granting the relief requested therein; and the Court having found that the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to sections 157 and 1334 of title 28 of the United States Code and the Amended Standing Order of Reference dated January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11*, 12 Misc.

¹ The Debtor in this Chapter 15 case, and the last four identifying digits of the tax number of the jurisdiction in which it pays taxes, is Olinda Star Ltd. (In Provisional Liquidation) (BVI – 9761).

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

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00032 (S.D.N.Y. Feb. 1, 2012) (Preska, C.J.); and the Court having found that this is a core proceeding pursuant to section 157(b)(2)(P) of title 28 of the United States Code; and the Court having found that venue of this proceeding is proper before this Court pursuant to sections 1409 and 1410 of title 28 of the United States Code; and the Court having found adequate and sufficient notice of the Motion having been provided; and no other or further notice being required; it is hereby

ORDERED, that the Recognition and Enforcement Hearing shall be held before this Court in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, December 9, 2022 at 2:00 p.m. (ET) and it is further

ORDERED that the Objection Deadline shall be December 2, 2022 at 4:00 p.m. (ET); and it is further

ORDERED, that the Notice Procedures set forth in the Motion constitute due and sufficient notice of the Petitions and the relief requested therein, and are hereby approved; and it is further

ORDERED, that the form of Recognition and Enforcement Hearing Notice annexed hereto as **Exhibit 1** is hereby approved; and it is further

ORDERED, that the notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of these Chapter 15 Cases or, to the extent applicable, are hereby waived; and it is further

ORDERED, that copies of Notice Documents shall be served upon the Chapter 15 Notice Parties in the manner set forth in the Motion within two (2) business days of entry of this Order; and it is further

ORDERED, that responses or objections, if any, to the Petitions be made in writing and set forth the basis therefor, and such responses or objections must be (i) filed electronically with the

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Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov) and a hard copy of such response or objection to be sent to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, and (ii) served upon White & Case LLP, 1221 Avenue of the Americas New York, New York 10020-1095 (Attn: John K. Cunningham, (jcunningham@whitecase.com); Pasianotto, Esq. Ricardo M. Esq. (ricardo.pasianotto@whitecase.com); and Kathryn Sutherland-Smith, Esq. (kathryn.sutherland.smith@whitecase.com), counsel to the Petitioner; and it is further

ORDERED, that service pursuant to this Order shall be good and sufficient service and adequate notice of the filing of the Verified Petition and the Recognition and Enforcement Hearing.

Dated: _____, 2022 New York, New York

THE HONORABLE CHIEF JUDGE MARTIN GLENN UNITED STATES BANKRUPTCY JUDGE

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<u>Exhibit 1</u>

Recognition and Enforcement Hearing Notice

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Attorneys for Eleanor Fisher, as Petitioner and Foreign Representative

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Olinda Star Ltd. (In Provisional Liquidation),¹

Debtor in a Foreign Proceeding.

Case No. 22-11447 (MG)

Chapter 15

NOTICE OF FILING AND HEARING ON PETITION UNDER CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE AND MOTION FOR RELATED RELIEF

)

¹

The Debtor in this Chapter 15 case, and the last four identifying digits of the tax number of the jurisdiction in which it pays taxes, is Olinda Star Ltd. (In Provisional Liquidation) (BVI – 9761).

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PLEASE TAKE NOTICE that on October 31, 2022, Eleanor Fisher (the "**Petitioner**" or the "**Foreign Representative**"), in her capacity as the duly-authorized foreign representative (as such term is defined in section 101(24) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "**Bankruptcy Code**")) of the BVI Proceeding (as defined below) of Olinda Star Ltd. (In Provisional Liquidation) ("**Olinda**"), commenced the above-captioned case under chapter 15 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**")² in furtherance of Olinda's provisional liquidation proceeding (the "**BVI Proceeding**") pending before the BVI Commercial Court (the "**BVI Court**") pursuant to section 170 of the BVI Insolvency Act, 2003 (as amended, the "**BVI Insolvency Act**") of the laws of the British Virgin Islands (the "**BVI**").

PLEASE TAKE FURTHER NOTICE that pursuant to the Motion, the Petitioner seeks, among other things, the entry of an order: (i) granting recognition of the BVI Proceeding pursuant to section 1517 of the Bankruptcy Code as the "foreign main proceeding" (as defined in section 1502(4) of the Bankruptcy Code) of Olinda, and all relief included therewith as provided in section 1520 of the Bankruptcy Code; (ii) recognizing the Petitioner as the "foreign representative" (as defined in section 101(24) of the Bankruptcy Code) of the BVI Proceeding for Olinda for purposes of this Chapter 15 Case; (iii) granting full force and effect and comity to Olinda's BVI scheme of arrangement and additional relief pursuant to sections 105(a), 1507(a), and 1521(a) of the Bankruptcy Code; and (iv) granting such other and further relief as the Court deems just and proper.

² The Foreign Representative commenced this Chapter 15 Case with respect to Olinda by filing the *Petitioner's Declaration and Verified Petition for Recognition of the BVI Proceeding and Motion for Requesting Additional Relief* (the "**Verified Petition**") [ECF No. 2 and the form of voluntary petition [ECF No. 1] filed concurrently therewith.

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PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition and all accompanying documentation are available to parties in interest on the Bankruptcy Court's Electronic Case Filing System, which can be accessed from the Bankruptcy Court's website at http://www.nysb.uscourts.gov (a PACER login and password are required to retrieve a document) or upon written request to the Petitioner's counsel (including by facsimile or e-mail) addressed to:

White & Case LLPorjcunningham@whitecase.com1221 Avenue of the Americasricardo.pasianotto@whitecase.comNew York, New York 10020-1095kathryn.sutherland.smith@whitecase.comTelephone:(212) 819-8200Facsimile: (212) 354-8113

Attn: John K. Cunningham, Esq.; Ricardo M. Pasianotto, Esq., and Kathryn Sutherland-Smith, Esq.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled an evidentiary hearing (the "**Recognition and Enforcement Hearing**") to consider the relief requested in the Verified Petition for **December 9**, 2022 at 2:00 p.m. (New York Time) in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York.

PLEASE TAKE FURTHER NOTICE that the Recognition and Enforcement Hearing will be held virtually via Zoom for Government, and any party in interest objecting to the Motion or the relief requested therein must appear at the Recognition and Enforcement Hearing at the time set forth above (unless ordered otherwise by the Bankruptcy Court).

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to appear at the Recognition and Enforcement Hearing, whether making a "live" or "listen only" appearance before the Court, must make an electronic appearance through the "eCourtAppearances" tool on the Bankruptcy Court's website (http://www.nysb.uscourts.gov/ecourt-appearances) on or before 4:00 p.m. (prevailing Eastern Time) the business day before the Recognition and Enforcement

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Hearing (the "**Appearance Deadline**") and not by emailing or otherwise contacting the Bankruptcy Court. Following the Appearance Deadline, the Bankruptcy Court will circulate by email a Zoom link to those parties who have made an electronic appearance. Additional information regarding the use of Zoom for Government and hearing procedures can be found on the Bankruptcy Court's website (https://www.nysb.uscourts.gov/zoom-video-hearing-guide)

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Verified Petition or the relief requested therein must do so in writing and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis therefor. Any such response or objection must be (i) filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov) and a hard copy of such response or objection shall be sent to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, and (ii) served upon White & Case LLP, 1221 Avenue of the Americas New York, New York 10020-1095 (Attn: John K. Cunningham, Esq. (jcunningham@whitecase.com); Ricardo M. Pasianotto, Sutherland-Smith, Esq. (ricardo.pasianotto@whitecase.com); Kathryn Esq. and (kathryn.sutherland.smith@whitecase.com), counsel to the Petitioner, so as to be received no later than December 2, 2022 at 4:00 p.m. (New York Time).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Verified Petition or the request for relief contained therein must appear at the Recognition and Enforcement Hearing at the time and place set forth above.

4

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PLEASE TAKE FURTHER NOTICE that, at the Recognition and Enforcement Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the case.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Verified Petition without further notice.

PLEASE TAKE FURTHER NOTICE that the Recognition and Enforcement Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

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Dated: [____], 2022 New York, New York

Respectfully submitted,

WHITE & CASE LLP

By: <u>/s/ John K. Cuningham</u> John K. Cunningham

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Attorneys for Eleanor Fisher, as Petitioner and Foreign Representative

22-11447-mg Doc 4-2 Filed 11/02/22 Entered 11/02/22 21:01:42 Exhibit B - Notice Party List Pg 1 of 10

<u>Exhibit B</u>

Notice Party List

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Via Electronic Mail

Office of the United States	201 Varick Street, Suite 1006	
Trustee for the Southern	New York, New York 10014, USA	
District of New York	Email: USTP.Region02@usdoj.gov	
Milbank, Tweed, Hadley &	28 Liberty Street	
McCloy LLP	New York, New York 10005-1413, USA	
	Attn: Abhilash M. Raval; araval@milbank.com	
	Attn: Mary Doheny; mdoheny@milbank.com	
Dechert LLP	Three Bryant Park	
	1095 Avenue of the Americas	
	New York, New York 10036, USA	
	Attn: Allan S. Brilliant; allan.brilliant@dechert.com	
	Attn: Craig P. Druehl; craig.druehl@dechert.com	
	2929 Arch Street	
	Philadelphia, Pennsylvania 19104-2808, USA	
	Tel: (215) 994-4000	
	Fax: (215) 994-2222	
	Attn: Michael S. Doluisio; michael.doluisio@dechert.com	
Thomaz Bastos, Waisberg,		
Kurzweil Advogados	Itaim Bibi, São Paulo, SP, Brazil	
	04538-133	
	Attn: Bruno Oliveira; bruno@twk.com.br	
	Attn: Carlos Garcia; carlos.garcia@twk.com.br	
	Attn: Giovanna Pignalosa; giovanna.pignalosa@twk.com.br	
	Attn: Herbert Kugler; <u>herbert@twk.com.br</u>	
	Attn: Ivo Waisberg; ivo@twk.com.br	
	Attn: João Pacca; joao.pacca@twk.com.br	
Harney Westwood &	Harney Westwood & Riegels LP	
Riegels LP	Craigmuir Chambers, PO Box 71	
	Road Town, Tortola VG1110	
	British Virgin Islands	
	Attn: Stuart Cullen; stuart.cullen@harneys.com	
Machado Meyer Advogados	Avenida Brigadeiro Faria Lima, n. 3144, 11th Floor	
	São Paulo, SP	
	Brazil	
	Attn: Pedro Henrique Jardim; pjardim@machadomeyer.com.br	
	Attn: Solano Neiva; SNeiva@machadomeyer.com.br	
	Attn: Gisela Mation; <u>GMation@machadomeyer.com.br</u>	

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Norton Rose Fulbright US	1301 Avenue of the Americas	
	New York, New York 10019, USA	
	United States	
	Attn: Andrew Rosenblatt;	
	andrew.rosenblatt@nortonrosefulbright.com	
	Attn: James A. Copeland;	
	jamescopeland@nortonrosefulbright.com	
Walkers	171 Main Street	
	PO Box 92, Road Town	
	Tortola VG1110	
	British Virgin Islands	
	<u>info@walkersbvi.com</u>	
Mattos Filho, Veiga Filho,	Praia do Flamengo, 200 RJ	
Marrey Jr. e Quiroga	Rio de Janeiro 22210-901	
Advogados	Brazil	
	mattosfilho@mattosfilho.com.br	
Pryor Cashman LLP	7 Times Square	
	New York, New York 10036, USA	
	Attn: Seth Lieberman; <u>slieberman@pryorcashman.com</u>	
	Attn: Patrick Sibley; psibley@pryorcashman.com	
	Attn: Andrew S. Richmond; arichmond@pryorcashman.com	
Veirano Advogados	Av. Presidente Wilson, 231 - 25° andar	
	20030-021 – Rio de Janeiro RJ – Brasil	
	Attn: Ricardo Gama; ricardo.gama@veirano.com.br	
	Attn: Camilla Carvalho; camilla.carvalho@veirano.com.br	
Cascione Pulino Boulos	Av. Brig. Faria Lima, 4.440, 14º andar	
Advogados	São Paulo, SP	
	Brazil	
	Attn: Paulo Campana; pcampana@cascione.com.br	
Galdino, Coelho Advogados	Av. Rio Branco 138 / 11º andar	
	Rio de Janeiro – RJ 20040 002	
	Brazil	
	Attn: Flavio Galdino; galdino@gc.com.br	
	Attn: Isabel Picot Franca; <u>ipicot@gc.com.br</u>	
	Attn: Cristina Biancastelli; <u>cbiancastelli@gc.com.br</u>	
	Attn: Vanessa Rodrigues; vrodrigues@gc.com.br	
Loyens & Loeff	P.O. Box 71170, 1008 BD Amsterdam	
Netherlands	Fred. Roeskestraat 100, 1076 ED Amsterdam	
	The Netherlands	
	Attn: Vincent Vroom; Vincent.vroom@loyensloeff.com	
Ogier	Ritter House	
	Wickhams Cay II	
	PO Box 3170	
	Road Town, Tortola	
	British Virgin Islands VG1110	
	Attn: Grant Carroll; grant.carroll@ogier.com	

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Loyens & Loeff	18-20, rue Edward Steichen	
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	Grand Duchy of Luxembourg	
	Luxembourg	
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	Attn: Veronique Hoffeld; veronique.hoffeld@loyensloeff.com	
Ernst & Young	EY Cayman Ltd.	
	62 Forum Lane	
	Camana Bay	
	P.O. Box 510	
	Grand Cayman	
	KY1-1106	
	Cayman Islands	
	Attn: Eleanor Fisher; Eleanor.Fisher@ky.ey.com	
	Attn: Roy Bailey; <u>Roy.Bailey1@vg.ey.com</u>	
Banco Bradesco S.A. Grand	75 Fort Street	
Cayman Branch	Appleby Tower, 5 th Floor	
	Georgetown	
	P.O. Box 1818	
	Grand Cayman	
	Cayman Islands KY1-1109	
	Attn: Márcio Martins Bonilha Neto;	
	marcio.bonilha@bradesco.com.br	
	Attn: Pedro Victor Nascimento Xavier;	
	pedro.xavier@bradesco.com.br	
Moneda S.A., AGF	Isidora Goyenechea 3621	
	8 th Floor	
	Santiago, Chile	
	Attn: Alexander Sideman; asideman@moneda.cl	
	Attn: Fernando Tisne; ftisne@moneda.cl	
	vgarcia@moneda.cl	
	funds-mo@moneda.cl	
Moneda International, Inc.	Isidora Goyenechea 3621	
	8 th Floor	
	Santiago, Chile	
	Attn: Alexander Sideman; asideman@moneda.cl	
	Attn: Fernando Tisne; ftisne@moneda.cl	
РІМСО	Attn: Kofi Bentsi; kofi.bentsi@pimco.com	
	, <u></u>	
Depository Trust Company	conversionsandwarrantsannouncements@dtcc.com	
	amendoza-felix@dtcc.com	
	skaylor@dtcc.com	

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The Norwegian Export	PO Box 1763	
Credit Guarantee Agency	Vika, 0112	
	Oslo	
	Attn: postmottak@giek.no	
	Attn: Inger Marit Borch; inger.marit.borch@giek.no	
	Attn: Johann Linn; Johan.Linn@giek.no	
The Norwegian state,	PO Box 1315	
represented by	Vika, 0112	
Eksportkreditt Norge AS	Oslo	
	Attn: kontakt@eksportkreditt.no	
	Attn: Lisen Kjekshus; LAK@eksportkreditt.no	
	Attn: Jørgen Hauge; JHA@eksportkreditt.no	
BNP Paribas S.A. –	37, Place Du Marché Saint Honoré Aci : Chd03a1 75031	
Shipping & Offshore	Paris Cedex 01	
	relations.actionnaires@bnpparibas.com	
ING Capital Markets LLC	1133 Avenue of the Americas	
	New York, New York 10036, USA	
	wholesale.banking.portal@ing.com	
Citibank, N.A.	388 Greenwich Street	
(Administrative Agent and 14 th Floor		
Collateral Agent)	New York, New York 10013, USA	
	Attn: Kevin.l.vargas@citi.com	
Citibank, N.A.	Citibank , N.A.	
	3800 Citibank Centre Tampa	
	Bldg B 3 rd Fl. Zone 12	
	Tampa, Florida 33610, USA	
	howard.flaxer@citi.com;	
	citiproxyusa@citi.com;	
	karen.j.kelly@citi.com;	
	lateshia.clarke@citi.com;	
	lorenzo.p.billante@citi.com	
Deutsche Bank Trust	c/o Deutsche Bank National Trust Company	
	Trust and Agency Services	
Company Americas	100 Plaza One	
	Mail Stop JCY03-0801	
	Jersey City, New Jersey 07311-3901, USA	
	Attn: rodney.gaughan@db.com	
Universel Investment Fund		
Universal Investment Fund Capinvest Fund Limited	3 Bayside Executive Park, West Bay Street PO Box No. 4875	
	Nassau, The Bahamas	
	Attn: Michael Paton; <u>mpaton@lennoxpaton.com</u>	
Comercial Perfuradora	Ladeira de Nossa Senhora no. 163	
Delba Baiana Ltda.	5 th Floor, Rio de Janeiro, RJ, Brazil	
	Attn: Newton Lins Filho; nicklins@delbabaiana.com.br	

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Interoil Representação Ltda.	Avenida Marechal Floriano no. 19, sala 2201 -16-	
	Rio de Janeiro, RJ, Brazil	
	Attn: Drilmar Jaci Monteiro; drilmar@interoil.com.br	
Capital International 3 Place des Bergues		
Research, Inc.	1201 Geneva, Switzerland	
	Attn: Guilherme Lins; guilherme.lins@cgii.com	
	Attn: Kristine Nishiyama; <u>kristine_nishiyama@capgroup.com</u>	
Samuel Lasry Sitnoveter	50 Riverside Blvd – Apt 4E	
5	New York, NY, 10069, USA	
	(917) 513-5997	
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Gustavo Arechabala	Attn: Gustavo Arechabala; gustavo.arechabala@speedy.com.ar	
Gustavo / Heenabala	Run. Ousuvo meendodid, <u>gasavo.areendodid(a/speedy.com.ar</u>	
Graf & Pitkowitz	Graf & Pitkowitz	
	Stadiongasse 2, 1010 Vienna	
	Attn: Nikolaus Pitkowitz; n.pitkowitz@gpp.at	
	500 C	
Bank of New York Mellon		
	<u>SCLW(<i>a</i>)bnymellon.com</u>	
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	Milwaukee, Wisconsin 53202, USA	
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Brown Brothers Harriman	paul.nonnon@bbh.com;	
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	edwin.ortiz@bbh.com;	
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Bank of New York Mellon BMD Harris Bank NA Brown Brothers Harriman	Stadiongasse 2, 1010 Vienna Attn: Nikolaus Pitkowitz; <u>n.pitkowitz@gpp.at</u> 500 Grant Street, RM 2700 Pittsburgh, Pennsylvania 15258-0001, USA Attn: Chelsey Ezell; <u>Chelsey.Ezell@bnymellon.com</u> SCLW@bnymellon.com 111 E Kilbourn Ave Milwaukee, Wisconsin 53202, USA Cyntha.Hammerel@fisglobal.com Jenny.Xiong@fisglobal.com WOS_MKE_Corporate.Actions@fisglobal.com paul.nonnon@bbh.com; njvoluntary@bbh.com; curtis.maffessoli@bbh.com; Michael.Leather@bbh.com; mavis.luque@bbh.com; corporate.actions.proxy@bbh.com;	

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Icaza, Gonzalez-ruis & Aleman Corporation Services Limited	Winterbotham Place, Marlborough & Queen Streets Nassau, Bahamas <u>igracs-amadeus@icazalaw.com</u>
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Evercore Group LLC	55 E. 52 nd Street New York, New York 10055, USA Attn: Stephen Hannan <u>Hannan@Evercore.com</u>
Preferred Bank	9350 Flair Drive, Suite 425 El Monte, California 91731, USA Attn: Ronnia Ching; <u>Ronnia.ching@preferredbank.com</u> Attn: Paul Nazari; <u>Paul.nazari@preferredbank.com</u>
Lennox Patton	Fleming House 4th Floor, Wickhams Cay PO Box 4012 Road Town, Tortola British Virgin Islands VG1110 Attn: Scott M. Cruickshank

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<u>Via First Class Mail</u>

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Association	Suite 1290
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	Andrew Calamari
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D.F. King	48 Wall Street, 22 nd Fl.
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Clearstream Banking S.A.	1155 Avenue of the Americas
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