Docket #0005 Date Filed: 07/09/2026

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

In re: Ambipar Emergency Response,[1] Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90709
In re: Ambipar Participações e Empreendimentos S.A., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90710
In re: Ambipar Lux S.à.r.l., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90711
In re: Environmental ESG Participações S.A., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90712
In re: Emergência Participações S.A., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90713

[1] 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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EMERGENCY MOTION FOR AN ORDER DIRECTING THE JOINT ADMINISTRATION OF THE CHAPTER 15 CASES OF AMBIPAR EMERGENCY RESPONSE AND ITS DEBTOR AFFILIATES PURSUANT TO 11 U.S.C. § 105(a) AND BANKRUPTCY RULE 1015(b)

Emergency relief has been requested. Relief is requested not later than 9:00 a.m. (prevailing Central Time) on July 13, 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.

A hearing will be conducted on this matter on July 13, 2026, at 9:00 a.m. (prevailing Central Time) in Courtroom 400, 4th floor, 515 Rusk Street, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Pérez's conference room number is 282694. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Pérez's homepage. The meeting code is "Judge Pérez." Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Pérez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

Thiago da Costa Silva (the "Foreign Representative"), in his capacity as the authorized foreign representative of the above-captioned debtors (collectively, the "Debtors"), which are the subject of jointly-administered judicial reorganization (*recuperação judicial*) proceedings (the "RJ Proceeding") pursuant to Brazilian Federal Law No. 11.101 of February 9, 2005 (as amended, the "Brazilian Bankruptcy Law"), filed before the Third Business Court of Rio de Janeiro (the "Brazilian Court"), by and through the undersigned counsel, respectfully submits this motion (this "Motion")[2] seeking an order substantially in the form attached hereto (the "Order") directing the

[2] In further support of this Motion, the Foreign Representative relies upon and incorporates by reference: (a) 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* (the "Motion for Recognition") and (b) the *Declaration of Thiago da Costa Silva in Support of 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 and Additional First Day Filings* (the "Foreign Representative Declaration"), both of which were filed concurrently herewith. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion for Recognition.

joint administration of the Debtors' chapter 15 cases, for procedural purposes only, pursuant to section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). In support of this Motion, the Foreign Representative respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P). 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 Motion for Recognition. A description of the RJ Proceeding, the Debtors' activities, business, corporate and capital structures, and the circumstances leading to the commencement of the RJ Proceeding and these chapter 15 cases (the "Chapter 15 Cases") may be found in the Motion for Recognition and in the Foreign Representative Declaration.

BASIS FOR RELIEF

3. Bankruptcy Rule 1015(b) provides that "[t]he court may order joint administration of the estates in . . . two or more cases pending in the court if they are brought by . . . a debtor and an affiliate." Fed. R. Bankr. P. 1015(b)(1)(D). Substantially concurrently herewith, each Debtor filed a *Chapter 15 Petition for Recognition of a Foreign Proceeding* with the Court. Moreover, as described in the Motion for Recognition, the Debtors are "affiliates" as that term is defined in the Bankruptcy Code, as Ambipar Topco directly or indirectly owns seventy percent or more of the voting securities of each other Debtor. *See* 11 U.S.C. § 101(2)(A), (B). Accordingly, the Court has authority to enter the Order and consolidate, for procedural purposes, the Debtors' Chapter 15 Cases.

4. Courts have granted joint administration in chapter 15 cases based solely upon Bankruptcy Rule 1015(b). *See, e.g.*, *In re Just Energy Group Inc.*, No. 21-30823 (MI) (Bankr. S.D. Tex. Mar. 9, 2021), Dkt. No. 26; *In re Calfrac Well Services Corp.*, No. 20-33529 (DRJ) (Bankr. S.D. Tex. July 14, 2020), Dkt. No. 12; *In re Odebrecht Engenharia e Construção S.A. - Em Recuperação Judicial*, Case No. 25-10482 (MG) (Bankr. S.D.N.Y. Mar. 18, 2025), Dkt. No. 10.

5. In addition to Bankruptcy Rule 1015(b), the relief requested herein is available pursuant to section 105(a) of the Bankruptcy Code. Section 105(a), made applicable in chapter 15 cases pursuant to section 103(a), permits this Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a). Section 105(a) "empower[s] the bankruptcy court to exercise its equitable powers—where 'necessary' or 'appropriate'—to facilitate the implementation of other Bankruptcy Code provisions." *In re Rodriguez*, 396 B.R. 436, 457 (Bankr. S.D. Tex. 2008) (quoting *Noonan v. Secretary of Health & Human Servs. (In re Ludlow Hosp. Soc'y, Inc.), 124 F.*3d 22, 27 (1st Cir. 1997); *see In re Fairfield Sentry Ltd.*, 458 B.R. 665, 691–92 (S.D.N.Y. 2011) (observing that bankruptcy courts may exercise "the equitable powers emanating from § 105(a)" to the extent consistent with the Bankruptcy Code and the Bankruptcy Rules (citing *Barbieri v. RAJ Acquisition Corp. (In re Barbieri)*, 199 F.3d 616, 620–21 (2d Cir. 1999))).

6. Joint administration of these cases is warranted because: (a) the Debtors' financial affairs and business operations are closely related; (b) the Debtors are party to a single, jointly administered and substantively consolidated RJ Proceeding in Brazil; and (c) the joint administration of the Chapter 15 Cases will ease the administrative burden on this Court and parties in interest.

7. Moreover, granting the relief requested herein will limit the costs associated with these Chapter 15 Cases, resulting in savings that the Debtors can use for their continued operations and for the preservation of their going concern value. It will also relieve the Court of the burden of entering duplicative orders and maintaining duplicative files for each of the Debtors' cases. Importantly, the joint administration of the Chapter 15 Cases will not affect the rights of creditors, as this Motion requests consolidation for procedural purposes only.

8. Accordingly, the Foreign Representative respectfully requests that the caption of the Chapter 15 Cases be modified to reflect their joint administration as follows:

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

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

[1] 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.

9. The Foreign Representative further requests that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

10. The Foreign Representative also requests that the Court direct that the following statement be entered on the docket of each of the Debtors' Chapter 15 Cases, other than on the docket of Ambipar Emergency Response, to reflect their joint administration:

> An Order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 15 Cases of Ambipar Emergency Response, Ambipar Participações e Empreendimentos S.A., Environmental ESG Participações S.A., Emergência Participações S.A., and Ambipar Lux S.à.r.l. The

docket of Ambipar Emergency Response in Case No. 26-90709 should be consulted in all matters affecting or related to this case.

11. The Foreign Representative also requests that he be authorized to (a) maintain and file the information required by Bankruptcy Rule 1007(a)(4) on a consolidated basis across all Debtors, (b) utilize a combined service list for the Debtors' jointly administered Chapter 15 Cases, and (c) send combined notices to creditors of the Debtors' estates and other parties in interest. As the relief sought in each of these cases is expected to be identical, the Foreign Representative anticipates that the motions, notices, hearings, orders, and other papers filed in these cases will affect all of the Debtors. Accordingly, no interested party will be prejudiced by the filing of consolidated schedules containing the same information as would otherwise be found in separate schedules. Under these circumstances, filing and maintaining separate lists under Bankruptcy Rule 1007(a)(4) would result in unnecessary confusion and a wasteful duplication of efforts and service. Moreover, because the Debtors ultimately expect in these Chapter 15 Cases to seek recognition and enforcement of an order approving the RJ Plan, which may include substantive consolidation of some or all of the Debtors,[3] out of an abundance of caution, the Debtors intend to send combined notices to creditors of other debtors in the RJ Proceeding who are located in the United States.

EMERGENCY CONSIDERATION

12. The Debtors request emergency consideration of this Motion pursuant to Bankruptcy Local Rule 9013-1 and Section G of the Complex Case Procedures. This Motion requests relief from procedural rules and requirements that pertain to matters of immediate significance or which involve deadlines sooner than twenty-one (21) days after the commencement

[3] The Debtors retain the right to propose separate RJ Plans in the RJ Proceeding, which would effectively un-consolidate them.

of these chapter 11 cases. The relief will save costs and avoid undue administrative burden and confusion only if granted immediately. The Debtors therefore request that the Court approve the relief requested in this Motion on an emergency basis.

NOTICE

13. The Foreign Representative requests that the Court grant this Motion without prior notice to creditors, as all material creditors of the Debtors are aware that the RJ Proceeding is jointly administered in Brazil and, as noted above, the entry of the Order will not adversely affect the rights of creditors because it is for procedural purposes only. Nevertheless, in accordance with Bankruptcy Rule 2002(q), the Foreign Representative will provide notice of this Motion to (a) the Debtors; (b) the Office of the United States Trustee for the Southern District of Texas; (c) all parties appearing on the master creditor matrix maintained by the noticing agent for Ambipar Response in its Chapter 11 case; and (d) the parties proposed to receive notice, as set forth in Exhibit 2 to the Order attached to the *Emergency Motion Pursuant to Fed. R. Bankr. 2002 and 9007 Requesting Entry of Order Scheduling Recognition Hearing and Specifying Form and Manner of Service of Notice*, filed contemporaneously herewith.

NO PRIOR REQUEST

14. No previous motion for the relief sought herein has been made by the Foreign Representative to this Court or any other court.

WHEREFORE the Foreign Representative respectfully requests entry of the Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

/s/ Jason S. Brookner

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Co-Counsel to the Foreign Representative

Certificate of Service

I certify that on July 9, 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
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: Ambipar Emergency Response,[1] Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90709
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In re: Environmental ESG Participações S.A., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90712
In re: Emergência Participações S.A., Debtor in a Foreign Proceeding	Chapter 15 Case No. 26-90713

[1] 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.

ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 15 CASES

Upon the Foreign Representative's *Motion for an Order Directing the Joint Administration of the Chapter 15 Cases of Ambipar Emergency Response and its Debtor Affiliates Pursuant to 11 U.S.C. § 105(a) and Bankruptcy Rule 1015(b)* (the "Motion"),[2] in his capacity as Foreign Representative of the above-captioned debtors (collectively, the "Debtors") requesting entry of this order (this "Order") pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 1015(b) for the joint administration of the above-captioned chapter 15 cases (the "Chapter 15 Cases") for procedural purposes only, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and 11 U.S.C. §§ 109 and 1501; and this Court having found that this is a core proceeding within the meaning of 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 of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1410; and this Court having found that the Foreign Representative's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and it appearing that the relief requested in the Motion is necessary and beneficial to the Debtors; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

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

2. The Chapter 15 Cases are hereby consolidated for procedural purposes only and shall be jointly administered by the Court under Case No. 26-90709 (the "Lead Case").

3. Nothing contained in this Order shall be deemed or construed as directing or otherwise affecting the substantive consolidation, in any jurisdiction, of any of the Debtors in the Chapter 15 Cases. The rights of the Debtors and all parties in interest are reserved with respect to any future request to recognize or enforce (or not recognize or enforce) substantive consolidation granted in the RJ Proceeding.

4. All pleadings, papers, and documents, except proofs of claim, lists, schedules, and statements, filed in the jointly administered cases shall bear the caption of the Lead Case, as follows:

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

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

1. 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.

5. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

6. A docket entry shall be made in each of the above-captioned cases, other than the Lead Case, to reflect the joint administration of these cases:

> An Order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 15 Cases of Ambipar Emergency Response, Ambipar Participações e

Empreendimentos S.A., Environmental ESG Participações S.A., Emergência Participações S.A., and Ambipar Lux S.à.r.l. The docket of Ambipar Emergency Response in Case No. 26-90709 should be consulted in all matters affecting or related to this case.

7. Notice of the Motion as provided therein shall be deemed good and sufficient.

8. The Foreign Representative is authorized to (a) file a consolidated list of the information required by Bankruptcy Rule 1007(a)(4); (b) utilize a combined service list for the Debtors' jointly administered cases; and (c) send combined notices to the Debtors' creditors and other parties in interest.

9. The Foreign Representative is authorized to take such actions as may be necessary and appropriate to implement the terms of this Order.

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

Signed: _____, 2026.

Alfredo R. Pérez
United States Bankruptcy Judge