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

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

APPELLANT'S STATEMENT OF ISSUES TO BE PRESENTED AND DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Ad Hoc Group of Financial Creditors (the "**Appellant**") hereby submits the following statement of issues and designation of items to be included in the record on appeal in connection with its appeal of this Court's *Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding* [Docket No. 208] and the incorporated *Memorandum Opinion Granting Debtors' Motion for (I) Recognition of Foreign Main Proceeding and (II) Motion to Suspend the Chapter 11 Case* [Docket No. 203].

Materials filed under seal or otherwise subject to restricted access are designated in their existing restricted form. This designation does not seek to unseal any item or authorize public disclosure. Any public description or restricted schedule shall be conformed to the applicable orders and the reviewing court's procedures before filing or transmission.

[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.

Statement of Issues Presented on Appeal

The Appellant presents the following issues on appeal:

1. Whether the Bankruptcy Court's determination that venue in the Chapter 15 Cases is proper for each of the Debtors, including three of the five Debtors that indisputably lack a place of business or assets in the relevant district, based solely on a procedural rule permitting joint administration of the estates of a debtor and its affiliate, constitutes reversible error.

2. Whether the Bankruptcy Court exceeded its authority under section 1529 of the Bankruptcy Code in determining that Ambipar Emergency Response, a debtor in a pending case under chapter 11, would receive all of the relief and protections automatically provided to a chapter 15 debtor upon recognition of a foreign main proceeding under section 1520 of the Bankruptcy Code, despite also recognizing in footnote 2 of the Recognition Order that "section 1520 does not apply to Debtor Ambipar Emergency Response", and without clarifying what if any protections Ambipar Emergency Response continues to have in the Chapter 11 Case following the Suspension Order.

Designation of Items to be Included in the Record

1. **Filings in Case No. 26-90709 (ARP) (Bankr. S.D. Tex.)**

The Appellant respectfully designates the following items filed on the docket of Case No. 26-90709 (ARP) (Bankr. S.D. Tex.) to be included in the appellate record pursuant to Bankruptcy Rule 8009(a):[2]

Date	Docket No.	Description
07/09/2026	1	Chapter 15 Petition for Ambipar Emergency Response
07/09/2026	2	Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative and (III) Related Relief Under Chapter 15 of the Bankruptcy Code
07/09/2026	3	Declaration of Gustavo Salgueiro Pursuant to 28 U.S.C. § 1746 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
07/09/2026	5	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)
07/09/2026	7	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
07/10/2026	11	Order Directing Joint Administration of Chapter 15 Cases
07/13/2026	45	Supplemental 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
08/14/2026	126	Caixa Economica Federal's Objection to Debtors' 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 Joinder to Ad Hoc Group of Financial Creditors' Objection

[2] Unless otherwise specified, designated pleadings include their supporting exhibits and attachments. Designation of a witness or exhibit list includes the list itself only and does not designate every underlying exhibit or exhibit compilation. Sealed documents are identified without disclosing confidential information and will be transmitted only in accordance with Bankruptcy Rule 8009(f), including an order of the appellate court accepting the documents under seal.

Date	Docket No.	Description
08/14/2026	128	Joinder of Deutsche Bank S.A. - Banco Alemao to the Ad Hoc Group's Objections to the Debtor Parties' Suspension and Recognition Motions
08/14/2026	129	The Ad Hoc Group of Financial Creditors' Objection to the Recognition Motion [**Filed under Seal**].
08/14/2026	130	Declaration of Andrew Costello in Support of the Ad Hoc Group of Financial Creditors' Objection to the Recognition Motion
08/16/2026	132	Opportunity's Limited Objection to: Motion for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative and (III) Related Relief Under Chapter 15 of the Bankruptcy Code [**Filed under Seal**]
08/16/2026	134	Declaration of Andrew L. Poplinger in Support of Opportunity's Objections to 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 (IV) the Debtor Parties' Motion to Suspend the Chapter 11 Case [**Filed under Seal**]
08/16/2026	135	Declaration of Sergio Savi in Support of Opportunity's Objections to 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 the Debtors Parties' Motion to Suspend the Chapter 11 Case
08/16/2026	137	Declaration of Andrew Costello in Support of the Ad Hoc Group of Financial Creditors' Objection to the Recognition Motion [**Filed under Seal**].
08/20/2026	153	The Ad Hoc Group of Financial Creditors Witness and Exhibit List and Exhibits
08/20/2026	154	The Ad Hoc Group's (1) Omnibus Reply to Objections to (A) Debtor Parties' Motion to Suspend the Chapter 11 Case and (B) 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 (2) Joinder to Debtors' Omnibus Reply to Objections to the Chapter 15 Recognition Motion and Chapter 11 Suspension Motion
08/20/2026	156	Debtors' Witness List and Exhibit List for the Hearing Scheduled on August 21, 2026
08/20/2026	157	The Ad Hoc Group of Financial Creditors Witness and Exhibit List for the Hearing Scheduled for August 21, 2026, at 9:00 A.M. (Prevailing Central Time)
08/20/2026	158	Opportunity's Witness and Exhibit List

Date	Docket No.	Description
08/20/2026	159	Debtors' Omnibus Reply to Objections to the Chapter 15 Recognition Motion and the Chapter 11 Suspension Motion **[Filed under Seal]**.
08/20/2026	160	The Ad Hoc Group of Financial Creditors Witness and Exhibit List **[Filed under Seal]**.[3]
08/20/2026	163	Joint Notice of the Objectors' Deposition Designations [**Filed under Seal**].
08/20/2026	165	Notice of the Ad Hoc Group's Deposition Counter-Designations and Objections [**Filed under Seal**].
08/20/2026	171	The Debtors' Deposition Designation **[Filed under Seal]**
08/20/2026	172	The Debtors' Counter-Designations and Objections **[Filed under Seal]**
08/20/2026	173	Opportunity's Transcript Counter-Designations for the Deposition of Sergio Savi
08/20/2026	175	Debtors' Witness and Exhibit List **[Filed under Seal]**
08/21/2026	181	The Debtors' Amended Deposition Designations **[Filed under Seal]**
08/28/2026	189	Stipulated Order and Agreement to the Admission into Evidence of Certain Exhibits
09/28/2026	203	Memorandum Opinion Granting Debtors' Motion for (I) Recognition of Foreign Main Proceeding and (II) Motion to Suspend the Chapter 11 Case
10/05/2026	205	Notice of Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding (Debtors)
10/05/2026	206	Notice of Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding (Ad Hoc Group of Financial Creditors)
10/06/2026	207	Opportunity's Notice of Competing Proposed Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding
10/12/2026	208	Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding
10/26/2026	209	Notice of Appeal and Statement of Election
10/29/2026	216	Amended Notice of Appeal and Statement of Election

[3] Each listed exhibit is designated in its complete filed or admitted form, including any constituent exhibits and attachments. Admittance of each exhibit is subject to the *Stipulated Order and Agreement to the Admission into Evidence of Certain Exhibits* [ECF No. 189]. Sealed documents remain subject to Bankruptcy Rule 8009(f) and applicable sealing orders and will be transmitted only in accordance with Bankruptcy Rule 8009(f), including an order of the appellate court accepting the documents under seal.

2. **Filings in Case No. 25-90524 (ARP) (Bankr. S.D. Tex.)**

The Appellant respectfully designates the following items filed on the docket of Case No. 25-90524 (ARP) (Bankr. S.D. Tex.) to be included in the appellate record pursuant to Bankruptcy Rule 8009(a):[4]

Date	Docket No.	Description
10/20/2025	1	Voluntary Petition
05/22/2026	206	Ad Hoc Group of Financial Creditors' Emergency Motion to Permit Filing of Proofs of Claim after Bar Date
06/08/2026	225	Declaration of Sheila Christina Neder Cerezetti Pursuant to 28 U.S.C. § 1746 in Support of the Ad Hoc Group of Financial Creditors' Emergency Motion to Permit Filing of Proofs of Claim After Bar Date
07/09/2026	254	Debtor Parties' Motion to Suspend the Chapter 11 Case
08/16/2026	350	The Ad Hoc Group of Financial Creditors' Objection to the Suspension Motion [**Filed under Seal**]
08/24/2026	400	Transcript of Hearing on 08/21/2026
10/12/2026	433	Order Suspending the Chapter 11 Case
10/26/2026	437	Notice of Appeal and Statement of Election

Transcript Designation and Rule 8009(b) Compliance

Pursuant to Rule 8009(b)(1) of the Federal Rules of Bankruptcy Procedure, the Appellant hereby certifies that it is not ordering any transcripts. All transcripts have been prepared, are on the docket, and are designated in the foregoing designation of the record.

Reservation of Rights

Subject to the applicable rules, deadlines and orders of the bankruptcy court and the court where the appeal is pending, the Appellant reserves the right to seek correction or supplementation of the record under Bankruptcy Rule 8009(e) and to object to an improperly designated item. Any

[4] Unless otherwise specified, designated pleadings include their supporting exhibits and attachments. Designation of a witness or exhibit list includes the list itself only and does not designate every underlying exhibit or exhibit compilation. Sealed documents are identified without disclosing confidential information and will be transmitted only in accordance with Bankruptcy Rule 8009(f), including an order of the appellate court accepting the documents under seal.

amendment, supplementation or objection will be made through the applicable procedure and does not extend a filing deadline or authorize unilateral expansion of the record.

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Dated: November 9, 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 November 9, 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