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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

***In re*:**	:	**Chapter 15**
	:	
	:	**Case No. 24–11982 (MG)**
UNIGEL PARTICIPAÇÕES S.A., ***et al.,***	:	
	:	**(Jointly Administered)**
Debtors in foreign proceedings.[1]	:	
	:	**Re: ECF No. 18**

DEBTORS' REPLY TO LIMITED OBJECTION OF THE UNITED STATES TRUSTEE AND COMMENTS FROM THE SECURITIES AND EXCHANGE COMMISSION WITH RESPECT TO MOTION FOR RECOGNITION OF FOREIGN MAIN PROCEEDINGS AND REQUEST FOR CERTAIN RELATED RELIEF UNDER CHAPTER 15 OF THE BANKRUPTCY CODE

[1] The Debtors in the foreign proceedings and each Debtor's tax identification or corporate registry number are as follows: Unigel Participações S.A. ("**Unigel**") (05.303.439/0001-07); Companhia Brasileira de Estireno ("**CBE**") (61.079.232/0001-71); Proquigel Química S.A. ("**Proquigel**") (27.515.154/0011-44); and Unigel Luxembourg S.A. ("**Unigel Lux**") (2018 22 00949). The location of the Debtors' corporate headquarters is 105 Avenida Engenheiro Luis Carlos Berrini, 11º Andar, Sala Unigel, Cidade Monções, Brooklin, São Paulo (SP) CEP 04571-010 Brasil.

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André Luis da Costa Gaia, in his capacity as the foreign representative (the "**Foreign Representative**") of Unigel Participações S.A. and the above-captioned debtors (collectively, the "**Debtors**"), hereby files this reply ("**Reply**") to the *Limited Objection of the United States Trustee to Motion for Recognition of Foreign Main Proceedings and Request for Certain Related Relief Under Chapter 15 of the Bankruptcy Code* [ECF No. 18] (the "**UST Limited Objection**")[2] and informal comments received from the United States Securities and Exchange Commission (the "**SEC**"). In support of this Reply, the Foreign Representative respectfully represents as follows:

Preliminary Statement

1. The UST Limited Objection focuses exclusively on the exculpation provision (the "**Exculpation Provision**") set forth in paragraph 11 of the Further Revised Proposed Recognition Order (as defined below). This objection ignores the fact that exculpation provisions are standard in chapter 15 recognition orders and here, the proposed relief is narrowly tailored and consistent with the Plan Approval Order entered by the Brazilian Bankruptcy Court. The Exculpation Provision is limited to protecting parties from liability in connection with actions taken in carrying out the EJ Plans and orders of this Court and the Brazilian Bankruptcy Court. This Court and others have granted similar relief in other chapter 15 cases – whether or not exculpation was provided in the relevant foreign proceeding. The Exculpation Provision is consistent with precedent and applicable law, and should be approved.

Background

2. On November 18, 2024, the Foreign Representative filed the *Motion for Recognition of Foreign Main Proceedings and Request for Certain Related Relief Under*

[2] Capitalized terms used but not defined herein have the meanings ascribed to them in the UST Limited Objection and the Recognition Motion.

Chapter 15 of the Bankruptcy Code [ECF No. 5] (the "**Recognition Motion**"), together with a proposed order. On November 26, 2024, the Foreign Representative filed a revised proposed *Order Granting Recognition of Foreign Main Proceedings and Request for Certain Related Relief Under Chapter 15 of the Bankruptcy Code* [ECF No. 16] (the "**Revised Proposed Recognition Order**").

3. On December 3, 2024, the United States Trustee for Region 2 (the "**United States Trustee**") filed the UST Limited Objection. That same day, the Debtors also received informal comments and questions from the SEC with respect to the proposed securities laws exemptions requested in the Recognition Motion.

4. Contemporaneously herewith, the Foreign Representative filed a further revised proposed *Order Granting Recognition of Foreign Main Proceedings and Request for Certain Related Relief Under Chapter 15 of the Bankruptcy Code* (the "**Further Revised Proposed Recognition Order**"), reflecting changes to the Revised Proposed Recognition Order in response to certain points raised in the UST Limited Objection and a clarification requested by the SEC.

Reply

I. Exculpation Is Available Pursuant to Sections 1521(a) and 1507

5. While the United States Trustee is correct that none of the EJ Plans or the Brazilian Orders contain an exculpation provision, that is not relevant. This Court and others have routinely approved exculpation provisions in chapter 15 cases, including for parties who are not estate fiduciaries, in cases where exculpation was not specifically contemplated in the applicable foreign proceeding.[3] Indeed, the United States Trustee cites no case that holds

[3] *See, e.g.*, *In re Casino, Guichard-Perrachon S.A.*, No. 24-10252 (DSJ) (Bankr. S.D.N.Y. Mar. 14, 2024) (ECF No. 15) (exculpating the debtors, foreign representative, trustee, security agent, paying agent, transfer agent,

exculpation must be present in the underlying foreign proceeding to be recognized in a chapter 15 case. This relief is permitted by chapter 15 of the Bankruptcy Code, is consistent with U.S. public policy, and is not inconsistent with the Brazilian Orders.

A. Exculpation Is Appropriate Under 1521(a) of the Bankruptcy Code

6. Section 1521(a) empowers the Court to "grant *any appropriate relief*" (emphasis added) to effectuate the purpose of chapter 15 and protect the debtor and creditors. Specifically, section 1521(a)(7) provides the court with authority to grant "any additional relief that may be available to a trustee, except for relief available under sections 522, 544, 545, 547, 548, 550 and 724(a)." The only governor applicable to section 1521 is that in granting additional relief, the interests of the debtor, creditors, and other interested entities must be sufficiently protected.[4]

7. Moreover, although the enumerated sub-sections of 1521(a) do not explicitly mention exculpation, the list contained therein is not exclusive.[5] Courts have held that "[t]he discretion that is granted [in section 1521(a)] is 'exceedingly broad[.]'"[6] This includes

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common depositary, registrar, and their respective representatives); *In re ODN I Perfurações Ltda.*, No. 23-10557 (DSJ) (Bankr. S.D.N.Y. May 4, 2023) (ECF No. 24) (exculpating DTC, collateral agents, trustees, and other agents and representatives); *In re U.S.J. – Açúcar e Álcool S.A.*, No. 22-10320 (DSJ) (Bankr. S.D.N.Y. Apr. 14, 2022) (ECF No. 21) (exculpating DTC, indenture trustees, and "any other parties necessary to effectuate the relief requested in the [v]erified [p]etition"); *In re OAS S.A.*, No. 15-10937 (SMB) (Bankr. S.D.N.Y. Oct. 5, 2018) (ECF No. 170) (exculpating DTC and indenture trustees); *In re Blue Ocean Res. PTE. Ltd.*, No. 18-22806 (RDD) (Bankr. S.D.N.Y. July 9, 2018) (ECF No. 19) (exculpating "BNYM, DTC, and any and all other entities and individuals"); *In re PT Bumi Res. TBK*, No. 17-10115 (MKV) (Bankr. S.D.N.Y. Mar. 17, 2017) (ECF No. 17) (exculpating DTC, indenture trustees, facility agents, and "any and all other entities and individuals . . . for any action or inaction taken in furtherance of this [o]rder"). In all of these cases there was no exculpation granted in the underlying foreign proceeding. In the *Olinda Star* case, *In re Olinda Star Ltd*. No 22-11447 (MG) (Bankr. S.D.N.Y. Dec. 9, 2022) (ECF No. 16), the court exculpated trustees, agents, custodians, and other parties, even though the underlying foreign scheme did not provide exculpation to such parties.

4 *See* 11 U.S.C. § 1522(a).

5 Section 1521(a) uses the word "including" before listing examples in sub-sections (1) through (7). The Rules of Construction in section 102(3) of the Bankruptcy Code specifically state that the words "'includes' and 'including' are not limiting[.]"

6 *In re Atlas Shipping A/S*, 404 B.R. 726, 739 (Bankr. S.D.N.Y. 2009) (citation omitted); *see also In re Avanti Commc'ns Grp. PLC*, 582 B.R. 603, 612 (Bankr. S.D.N.Y. 2018) (same); *In re Olinda Star Ltd.*, 614 B.R. 28,

discretion to grant exculpation. The United States Trustee's reliance on *In re Vitro S.A.B. de C.V.*[7] to assert the contrary is wrong. The Fifth Circuit in *Vitro* did not assess the availability of exculpation under section 1521(a), but focused on the availability of nonconsensual third-party releases.

8. As noted above, courts routinely exculpate debtors, foreign representatives, indenture trustees, creditors, and other parties from liability to prevent interference with implementation of restructuring plans and related court orders. This is exactly the kind of additional relief necessary to effectuate the purpose of chapter 15 and to protect debtors and creditors, as contemplated by section 1521. Here, the Directed Parties, the Debtors, the Foreign Representative, and the Participating Creditors are tasked with carrying out the terms of the restructuring transactions contemplated by the EJ Plans and the relevant orders of this Court and the Brazilian Bankruptcy Court. They should not be exposed to liability in doing so. In turn, the interests of others have been and will continue to be protected. Creditors received access to information and notice of the Foreign Proceedings and the EJ Plans, and had the opportunity to object and be heard. Such creditors also received notice of these chapter 15 cases and had an opportunity to object to the Recognition Motion. No creditor has objected. Indeed, no one other than the United States Trustee objected. Also, the Exculpation Provision contains a carve out for any action or inaction constituting gross negligence, fraud, bad faith, or willful misconduct[8]. Thus, creditors are sufficiently protected by the Exculpation Provision as required by section 1522 of the Bankruptcy Code.

46 (Bankr. S.D.N.Y. 2020) (same); *In re Markus*, 610 B.R. 64, 76 (Bankr. S.D.N.Y. 2019) (same); *In re Foreign Econ. Indus. Bank Ltd., "Vneshprombank" Ltd.*, 607 B.R. 160, 170 (Bankr. S.D.N.Y. 2019) (same).

7 701 F.3d 1031 (5th Cir. 2012).

8 The Further Revised Proposed Recognition Order applies such carve out to the Participating Creditors, which had previously been omitted in error.

B. Exculpation Is Also Available As Additional Assistance Under Section 1507

9. The Court may also provide additional assistance to a foreign representative under section 1507, provided that such assistance is "consistent with the principles of comity" and will reasonably assure just treatment and protection of creditors and the debtor's assets.[9] Contrary to the United States Trustee's assertion, the reference to comity in section 1507(b) is not to limit the chapter 15 court to only grant relief that a foreign court has granted, but rather ensures the relief granted in a chapter 15 case is not violative of or inconsistent with what the foreign court has ordered. Indeed, the United States Trustee does not cite to a single case holding otherwise.[10]

10. As noted above, the Exculpation Provision is in furtherance of implementation of the EJ Plans, the Brazilian Orders, and this Court's orders. As such, it helps foster fair distribution of the Debtors' property consistent with the EJ Plans, just and equal treatment of creditors, and uniformity in enforcement of the plans and orders across stakeholders and jurisdictions. This is entirely consistent with principles of comity, as it reinforces the Brazilian Bankruptcy Court's orders.

11. Moreover, the Exculpation Provision is explicitly tailored to not violate the Brazilian Bankruptcy Court's Plan Approval Order.[11] The intent here is to comply with the Brazilian Bankruptcy Court's ruling striking from the EJ Plans nonconsensual third-party

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[9] 11 U.S.C. § 1507; s*ee also Avanti*, 582 B.R. at 612; *Atlas Shipping*, 404 B.R. at 737–38; *In re Bear Stearns High-Grade Structured Credit Strategies Master Fund, Ltd.*, 389 B.R. 325, 333 (S.D.N.Y. 2008).

[10] The legislative history of section 1507 is particularly informative, as it provides that, "[section 1507] is intended to permit the further development of international cooperation begun under section 304, but is not the basis for denying or limiting relief otherwise available under this chapter." H.R. REP. NO. 109-31, pt. 1, at 109 (2005).

[11] *See* Further Revised Proposed Recognition Order at ¶ 11 ("The Debtors, the Foreign Representative, the Directed Parties, the Participating Creditors, and each of their respective current and former officers, directors, managers, predecessors, successors, assigns, principals, members, employees, agents, attorneys, consultants, advisors, other professionals, and representatives, to the maximum extent permitted by law and **to the extent not inconsistent with the EJ Plans and the Brazilian Orders**…") (emphasis added).

releases and dismissals of lawsuits against non-debtors[12] by ensuring exculpation of parties other than the Debtors and the Foreign Representative is only effective against parties who consensually granted releases of such non-debtors under the EJ Plans. Given precedent chapter 15 relief, this limitation arguably is not even necessary, but the Foreign Representative deemed it prudent given the Brazilian Bankruptcy Court's specific ruling on nonconsensual releases.

12. Furthermore, the other factors in section 1507(b) either are met or are not implicated. Approval of the Exculpation Provision (1) helps ensure the just and uniform treatment of claim and interest holders by facilitating implementation of the EJ Plans and limiting parties' ability to take action in contravention of such plans; (2) does not implicate the processing of claims; (3) helps prevent preferential or fraudulent dispositions of property of the debtor; and (4) enables the distribution of the Debtors' property consistent with the EJ Plans. In particular, implementation of the plans and orders according to their terms, with the assistance of the exculpated parties, will promote the just treatment of claims and fair distribution of proceeds.

II. The Exculpation Provision is Consistent with U.S. Public Policy

13. Contrary to the United States Trustee's position, exculpation provisions that protect non-estate fiduciaries and exculpate for future conduct are regularly approved and are not contrary to public policy. Not a single decision cited by the United States Trustee stands for the proposition that an exculpation provision violates section 1506 of the Bankruptcy Code.

14. Section 1506 of the Bankruptcy Code provides that, "[n]othing in this chapter prevents the court from refusing to take an action governed by this chapter if the action

[12] The Brazilian Bankruptcy Court held that releases of third parties must be consensual, and thus are only granted by Covered Creditors under the EJ Plans (i.e., creditors who are signatories to the EJ Plans). Accordingly, the Brazilian Bankruptcy Court ruled that sections 11.1, 11.3, 15.10, and 15.11 of the EJ Plans – to the extent they benefit third parties – are only enforceable against such Covered Creditors. *See* Recognition Motion at ¶ 84; Representative Decl. at ¶ 68; Attorney Decl. at ¶ 50.

would be manifestly contrary to the public policy of the United States." Courts have held this provision should be narrowly interpreted.[13]

15. Courts in the United States—in both chapter 11 cases and chapter 15 cases—routinely approve exculpation of parties who are not estate fiduciaries.[14] As recognized by this Court in *In re Wythe Berry Fee Owner LLC*:

> [A] proper exculpation provision is a protection not only of court-supervised fiduciaries, but also of court-supervised and court-approved transactions. If this Court has approved a transaction as being in the best interests of the estate and has authorized the transaction to proceed, then the parties to those transactions should not be subject to claims that effectively seek to undermine or second-guess this Court's determinations.[15]

Non-estate fiduciaries are entitled to benefit from an exculpation provision where such parties "made significant contributions to the success of [the cases]."[16]

16. Here, the non-estate fiduciaries covered by the proposed Exculpation Provision have made, and will continue to make, significant contributions to the success of the Foreign Proceedings and these chapter 15 cases. For example, the Participating Creditors played

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13 *See, e.g.*, *In re Sino-Forest Corp.*, 501 B.R. 655, 665 (Bankr. S.D.N.Y. November 25, 2013) (emphasizing that this public policy exception is narrowly construed) (citing *In re Ephedra Prods. Liab. Litig.*, 349 B.R. 333 (S.D.N.Y. 2006)); *see also Vitro*, 701 F.3d at 1069 ("§ 1506 was intended to be read narrowly…").

14 *See, e.g.*, *In re Wythe Berry Fee Owner LLC*, No. 22-11340 (MG), 2024 Bankr. LEXIS 1254, *38 (Bankr. S.D.N.Y. May 29, 2024) (rejecting objector's argument that the plan exculpation provision could not include non-estate fiduciaries and noting that exculpation provisions are different from non-consensual third-party releases); *In re Genesis Glob. Holdco, LLC*, 660 B.R. 439, 528 (Bankr. S.D.N.Y. May 17, 2024) (rejecting United States Trustee's argument that the exculpation provision should only apply to estate fiduciaries); *In re Evergreen Gardens Mezz, LLC, et al.*, No. 21-10035 (MG) (Bankr. S.D.N.Y. Nov. 5, 2021) (ECF No. 222) (approving plan exculpation provision providing for exculpation for certain non-estate fiduciaries); *In re KG Winddown, LLC, et al.* No. 20-11723 (MG) (Bankr. S.D.N.Y. June 9, 2021) (ECF No. 494) (permitting exculpation of purchaser as non-estate fiduciary); *In re Genco Shipping & Trading Ltd.*, No. 14-11108 (SHL) (Bankr. S.D.N.Y. July 2, 2014) (ECF No. 322) (approving exculpation provision in plan providing exculpation for non-estate fiduciaries); *see supra* footnote 3.

15 *In re Wythe Berry Fee Owner LLC*, No. 22-11340 (MG), 2024 Bankr. LEXIS 1254, *38 (Bankr. S.D.N.Y. May 29, 2024) (citing *Aegean Marine Petroleum Network, Inc.*, 599 B.R. 717, 721 (Bankr. S.D.N.Y. April 8, 2019)).

16 *In re LATAM Airlines Grp. S.A.*, No. 20-11254 (JLG), 2022 Bankr. LEXIS 1725, *159 (Bankr. S.D.N.Y. June 18, 2022).

an important role in negotiating and supporting the restructuring transactions, and are backstopping the injection of new capital.[17] DTC and BNY are tasked with taking steps to effectuate cancellation of the 2026 Notes and distribution of the new securities.[18] Further, Unigel Netherlands Holding Corporation B.V. is acquiring from Cigel 100% of the equity interests in Unigel.[19] The STAK will then issue the HoldCo Depositary Receipts, which represent interests in the HoldCo Class B Shares.[20]

17. The United States Trustee's arguments with regard to needing temporal limits in the exculpation are similarly misguided. It is well-settled by this Court that exculpation provisions protect those authorized by the court to carry out the bankruptcy process, even after the effective date of a plan.[21] It is necessary for the Exculpation Provision to extend to actions that have not occurred yet because the restructuring transactions contemplated by the EJ Plans have yet to be completed. While the bulk of these actions will occur on or before the plans' effective date, there may be some steps that, as a practical matter, follow. But the only actions protected are those taken in furtherance of Court-approved transactions.[22] This is similar to

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[17] Recognition Motion at ¶ 88.

[18] *Id.*

[19] *Id.* at ¶ 87

[20] *Id.*

[21] *See*, *e.g.*, *In re Genesis Glob. Holdco, LLC*, 660 B.R. 439, 528 (Bankr. S.D.N.Y. May 17, 2024) (rejecting the United States Trustee's argument that exculpation clauses cannot extend past the effective date of the plan); *In re Ditech Holding Corp*., No. 19-10412 (JLG), 2021 Bankr. LEXIS 2274, *25 (Bankr. S.D.N.Y. Aug. 20, 2021) (finding that the exculpation provision of the plan shielded the defendants from separate lawsuit because their actions in their official capacities, which occurred after the effective date, fell under the administration of the plan).

[22] The requested Exculpation Provision limits the scope of the covered parties' actions or inactions to those "taken in accordance with this Order, the EJ Plans, and the Brazilian Orders." Further Revised Recognition Order at ¶ 11.

exculpation provisions approved in other chapter 15 proceedings.[23] Therefore, the Exculpation Provision should be approved.

III. Clarifications in Response to the SEC

18. As stated in the Recognition Motion, Regulation S under the Securities Act ("**Regulation S**") provides an exemption from registration requirements in the United States for offers and sales of securities that occur outside the United States. At the SEC's request, the Foreign Representative hereby includes the following additional explanations supporting the exemption request:

- Rule 903 of Regulation S provides the conditions to exemption for a sale by an issuer, a distributor, their respective affiliates or anyone acting on their behalf.
- Rule 904 of Regulation S provides the conditions to exemption for a resale by persons other than those covered by Rule 903.
- In each case, any sale must be completed in an offshore transaction, as that term is defined in Regulation S, and no directed selling efforts, as that term is defined in Regulation S, may be made in the United States and any additional conditions pursuant to clause (b) of Rules 903 and 904, as applicable, of Regulation S must be satisfied.[24]
- Rule 902(h) states, among other things, that the offer of securities is made in an "offshore transaction" if the offer is not made to a person in the United States and at the time the buy order is originated, the buyer is outside the United States, or the seller or any person acting on its behalf reasonably believe that the buyer is outside the United States.
- As a condition to receiving the securities in reliance on Regulation S, creditors will represent to the Debtors that they are outside of the United States and are not United States Persons (as such terms are defined in section 101 of the Bankruptcy Code). Therefore, the offer of the securities

[23] *See, e.g.*, *In re Casino, Guichard-Perrachon S.A.*, No. 24-10252 (DSJ) (Bankr. S.D.N.Y. Mar. 14, 2024) (ECF No. 15) ("…shall be exculpated from any liability for any action or inaction taken in accordance with this Order, the Accelerated Safeguard Plans, and the French Orders…"); *In re ODN I Perfurações Ltda.*, No. 23-10557 (DSJ) (Bankr. S.D.N.Y. May 4, 2023) (ECF No. 24) ("…shall … be exculpated and released from any liability for any action or inaction taken in connection with this Order…"); *In re U.S.J. – Açúcar e Álcool S.A.*, No. 22-10320 (DSJ) (Bankr. S.D.N.Y. Apr. 14, 2022) (ECF No. 21) ("…exculpating and releasing the Directed Parties from any liability for any action or inaction taken in furtherance of, and/or in accordance with, this Order or the Brazilian RJ Plan…"); *In re PT Bumi Res. TBK*, No. 17-10115 (MKV) (Bankr. S.D.N.Y. Mar. 17, 2017) (ECF No. 17) ("…shall be exculpated and released from any liability for any action or inaction taken in furtherance of this Order…").

[24] 17 C.F.R § 230.903.

will be made in an "offshore transaction." For resales, the indentures will require the registrar to register transfers to non-U.S. persons only to the extent they have received transfer certificates including substantially similar representations.

- Furthermore, "directed selling efforts" is defined under Rule 902(c) as "any activity undertaken for the purpose of, or that could reasonably be expected to have the effect of, conditioning the market in the United States for any of the securities being offered in reliance on this Regulation S."[25]
- None of Unigel, its affiliates, the creditors or any person acting on their or any of their behalf has engaged, or expects to engage, in any such directed selling efforts within the meaning of Regulation S for securities being sold in reliance on Regulation S. Additionally, for resales, similar to the above, the indentures will require the registrar to register transfers to non-U.S. persons only to the extent they have received transfer certificates certifying that no directed selling efforts have been made.
- Lastly, under Rule 903(b), no conditions other than those set forth in Rule 903(a) apply to securities if the securities are issued by a foreign issuer that reasonably believes at the commencement of the offering that there is no substantial U.S. market interest in the securities to be offered or sold as outlined in Rule 903(b).
- Each issuer and guarantor is of the new securities, and at closing is expected to be, a foreign issuer and reasonably believes that there is, and at closing will be, no substantial U.S. market interest in the securities. Therefore, no additional conditions apply to such securities under Rule 903. Rule 904(b)(1) is not applicable because the securities at issue are not those specified in Category 2 or 3 of Rule 903.
- Pursuant to Rule 904(b)(2), in the case of an offer or sale of securities by an officer or director of the issuer or a distributor, who is an affiliate of the issuer or distributor solely by virtue of holding such position, no selling concession, fee or other remuneration can be paid in connection with such offer or sale other than the usual and customary broker's commission that would be received by a person executing such transaction as agent.
- To the extent that there will be resales by any such officers or directors, they will have to represent in the transfer certificate that they have complied with these conditions.

Conclusion

19. For the foregoing reasons, the UST Limited Objection should be overruled and the relief provided for in the Further Revised Proposed Recognition Order should be granted.

[25] 17 C.F.R. § 230.902.

Dated: December 6, 2024
New York, New York

/s/ Kelly DiBlasi

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