

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

GOVERNMENT DEVELOPMENT BANK
FOR PUERTO RICO,

Applicant.

PROMESA

Title VI

Case No. 18-1561

Hearing Date: September 7, 2018 at 10:00
a.m. (ET)¹

Objection Deadline: August 24, 2018 at 4:00
p.m. (ET)

MOTION CLARIFYING FILING AND SUBMITTING COVER SHEET

The Government Development Bank for Puerto Rico (“**GDB**”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“**AAFAF**”) hereby submit this motion (the “**Motion**”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “**Procedures Order**”), approving the Approval Procedures (as defined below) in connection with this Court’s consideration of the Qualifying Modification for GDB (the “**Qualifying Modification**”) pursuant to section 601(m)(1)(D) of the Puerto Rico Oversight, Management, and Economic Stability Act (“**PROMESA**”). In support of this Motion, GDB and AAFAF state as follows:

1. Today GDB and AAFAF submitted an Application pursuant to Section 601(m)(1)(D) of the Puerto Rico Oversight, Management, and Economic Stability Act.
2. Along with the Application, GDB and AAFAF filed a Declaration of Suzanne Uhland in support thereof. Such declaration, in turn, has several exhibits (Ex. A-Q). The declaration and exhibits thereto were initially attached to the Application as exhibits and in the inverse order. To correct this matter, GDB and AAFAF have filed the Declaration

¹ The Hearing will be conducted in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007.

with the exhibits thereto as a separate docket entry (Docket Entry 5) and request that the Court and other parties refer to Docket 5 as the correct entry for the Uhland Declaration and exhibits thereto.

3. Attached to this motion is the Cover Sheet for the Application.

Dated: August 10, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/ María D. Trelles Hernández
María D. Trelles Hernández
USDC No. 225106
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ALVAREZ LLC**
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- and -

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*Attorneys for the Puerto Rico Fiscal
Agency and Financial Advisory Authority
and the Government Development Bank
for Puerto Rico*

DPR MODIFIED PROMESA B1040 (FORM 1040) (05/17)

PROMESA COVER SHEET (Instructions on Reverse)		CASE NUMBER (Court Use Only)			
PLAINTIFFS (DEBTOR, if Title III Petition; ISSUER, if Title VI Application) Government Development Bank for Puerto Rico		DEFENDANTS			
ATTORNEYS (Firm Name, Address, and Telephone No.) <small>O'Melveny & Myers LLP/ 7 TIMES SQUARE/NEW YORK, NEW YORK 10036; 212-326-2000 Pietrantoní Méndez & Alvarez/ 208 Ponce de León Ave. Ste. 1901/San Juan, P.R. 00918; 787-274-1212</small>		ATTORNEYS (If Known)			
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> Creditor <input type="checkbox"/> Trustee <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Other		PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> Creditor <input type="checkbox"/> Trustee <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Other			
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) PROMESA Title VI Application					
NATURE OF SUIT					
<input type="checkbox"/> PROMESA Title III Petition <input checked="" type="checkbox"/> PROMESA Title VI Application for Approval of Modifications <input type="checkbox"/> Other Federal Question <input type="checkbox"/> Adversary Proceeding <input type="checkbox"/> Demand \$ _____					
<p style="text-align: center;"><i>If Adversary Proceeding is checked, number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc., below:</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property – other FRBP 7001(2) - Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation </td> <td style="width: 50%; vertical-align: top;"> FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief - imposition of stay <input type="checkbox"/> 72-Injunctive relief - other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case) </td> </tr> </table>				FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property – other FRBP 7001(2) - Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation	FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief - imposition of stay <input type="checkbox"/> 72-Injunctive relief - other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
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TITLE III CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES					
NAME OF DEBTOR		CASE NO.			
DISTRICT IN WHICH CASE IS PENDING	DIVISION OFFICE	NAME OF JUDGE			

DPR MODIFIED PROMESA B1040 (FORM 1040) (05/17)

RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH CASE IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) s/ María D. Trelles Hernández		
DATE 8/10/2018	PRINT NAME OF ATTORNEY (OR PLAINTIFF) María D. Trelles Hernández	

THIS FORM IS TO BE USED EXCLUSIVELY FOR FILINGS RELATING TO THE PUERTO RICO OVERSIGHT MANAGEMENT AND ECONOMIC STABILITY ACT (PROMESA). FOR ADMINISTRATION PURPOSES **ONLY**, THE PUBLIC DOCKETS FOR PROMESA PROCEEDINGS UNDER TITLE III AND ADVERSARY PROCEEDINGS WILL BE MAINTAINED ON THE CASE MANAGEMENT/ELECTRONIC CASE FILING (CM/ECF) SYSTEM OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO. THESE CASES ARE UNDER THE JURISDICTION OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO.