

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

THE GOVERNMENT DEVELOPMENT BANK FOR
PUERTO RICO,

Applicant.

PROMESA
Title VI

Caso No. 18-1561-LTS

**NOTICE OF INTENTION TO OBJECT TO THE QUALIFYING MODIFICATION FOR
THE GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO**

TO THE HONORABLE COURT:

COME NOW, creditor Adsuar Muñiz Goyco Seda & Pérez-Ochoa, PSC (“AMG”), by and through its undersigned representatives, very respectfully avers and prays as follows:

1. On August 10, 2018, the Government Development Bank for Puerto Rico (“GDB”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) submitted for the consideration of this Honorable Court the *Urgent Motion for Entry of an Order Setting the Deadline for (I) Parties to File a Notice of Intention to Object to the Qualifying Modification for the Government Development Bank for Puerto Rico and (II) Parties to File Standing Objections* (“Urgent Motion”), requesting the immediate entry of an order (i) setting August 20, 2018, as the deadline for parties to file a notice of intention to object to the Qualifying Modification for GDB and (ii) setting August 30, 2018, as the deadline for filing any objections related to the standing of a party to object to the Qualifying Modification. *See, Docket No. 3.*

2. On that same day, this Honorable Court entered an order granting the *Urgent Motion*, thereby requesting parties who intend to file an objection to file a *Notice of Intention to Object* by August 20, 2018, and to file any objections related to the standing of a party to object to the Qualifying Modification by August 30, 2018. *See, Docket No. 7.*

3. In accordance with this Honorable Court's order granting the *Urgent Motion*, AMG files this *Notice of Intention to Object* pursuant to its claim against the GDB for attorney's fees and professional services rendered from, approximately, January 2012 to October 2015. Given that the GDB has an unsatisfied debt with AMG for professional services amounting to approximately \$51,103.25, AMG reserves the right to object to the Qualifying Modifications for GDB.

WHEREFORE, AMG respectfully request that this Honorable Court take notice of the foregoing.

RESPECTFULLY SUBMITTED.

Dated: August 20, 2018

ADSUAR MUÑIZ GOYCO
SEDA & PÉREZ-OCHOA, PSC
208 Ponce de León Avenue, Suite 1600
San Juan, PR 00936
787.756.9000 (Phone)
787.756.9010 (Fax)

By: /s/ Alejandro A. Santiago-Martínez
Alejandro A. Santiago-Martínez
(USDC-PR No. 304002)
asantiago@amgprlaw.com

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing notice with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants and attorneys of record and that this Notice will be served on this 20th day of August, 2018 upon the following parties and counsel by hand delivery and/or courier service.

Dated: August 20, 2018

**GOVERNMENT DEVELOPMENT BANK
OF PUERTO RICO**

Minillas Government Center
Avenida de Diego
Parada 22
San Juan, PR 00907
Attn: Belén Fornaris Alfaro
(by hand delivery)

**PUERTO RICO FISCAL AGENCY AND
FINANCIAL AUTHORITY**

Minillas Government Center
Avenida de Diego
Parada 22
San Juan, PR 00907
Attn: Mohammad Yassin Mahmud
(by hand delivery)

O'MELVENY & MYERS LLP

Times Square Tower
Seven Times Square
New York, NY 10036
Attn: John J. Rapisardi, Esq.
Suzanne Uhland, Esq.
Peter Friedman, Esq.
(by postal service)

By: /s/ Alejandro A. Santiago-Martínez
Alejandro A. Santiago-Martínez
USDC-PR Bar. No. 304002