

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

GOVERNMENT DEVELOPMENT BANK  
FOR PUERTO RICO

Applicant.

PROMESA  
Title VI

No. 18-1561

**GDB AND AAFAF’S MOTION SUBMITTING TESTIMONIAL MATERIALS IN  
COMPLIANCE WITH ORDER SETTING FURTHER PROCEDURES FOR  
THE QUALIFYING MODIFICATION HEARING (ECF NO. 247)**

COME NOW the Government Development Bank for Puerto Rico (“GDB”) and the Puerto Rico Fiscal Agency & Financial Advisory Authority (“AAFAF”), in this Title VI proceeding, through the undersigned counsel, and in compliance with the Order Setting Further Procedures for the Qualifying Modification Hearing (ECF No. 247), hereby submit with this motion the testimonial materials that GDB and AAFAF submit for the Hearing in connection with the objection filed by Siemens to the proposed Qualifying Modification (ECF No. 192).

The testimonial materials submitted herewith are:

**(A) Testimonial Materials for Mr. Jesús García Rivera (Mr. García), retired GDB employee and a GDB/AAFAF witness.**

- The materials submitted by GDB are:
  - (1) Unsworn Statement Under Penalty of Perjury dated October 31, 2018.
  - (2) Designations of Mr. García’s deposition transcript as re-direct examination.
- Siemens’ designations for this witness may be found at ECF No. 257-2.

**(B) Testimonial Materials for Mr. Javier Hernández Carrera (Mr. Hernández), Auxiliary Executive Director for Administration and Finance for the Puerto Rico**

**Highway (HTA), HTA's Rule 30(b)(6) designee and Transportation Authority, a witness called by Siemens.**

- The materials submitted by GDB are:
  - (1) Designations of Mr. Hernández's deposition transcript as cross-examination.
- Siemens' designations for this witness may be found at ECF No.257-3.

**(C) Testimonial Materials for Mr. Josué Menéndez Agosto (Mr. Menéndez), Siemens' Rule 30(b)(6) designee and a witness called by Siemens.**

- The materials submitted by GDB are:
  - (1) Designations of Mr. Menéndez's deposition transcript as cross-examination.
- Siemens' designations for this witness may be found at ECF No. 257-4.

**(D) Testimonial Materials for Mr. José Santiago Ramos (Mr. Santiago), GDB's Chief Restructuring Officer and Rule 30(b)(6) designee and a GDB/AAFAF witness.**

- The materials submitted by GDB are:
  - (1) Unsworn Statements Under Penalty of Perjury dated October 31, 2018 and October 31, 2017.
  - (2) Designations of Mr. Santiago's deposition transcript as re-direct examination.
- Siemens' designations for this witness may be found at ECF No. 257-5.

**WHEREFORE**, GDB and AAFAF respectfully request that the Court take notice of the foregoing and the attached testimonial materials.

**I HEREBY CERTIFY:** That on this date a true and exact copy of the foregoing document has been filed with the Clerk of the Court using the CM/ECF system, which automatically serves notification of the filing to all attorneys of record.

Respectfully submitted, in San Juan, Puerto Rico, this 4<sup>th</sup> day of November, 2018.

/s/ María D. Trelles Hernández

María D. Trelles Hernández  
USDC No. 225106

/s/ María E. Martínez Casado

María E. Martínez Casado  
USDC No. 305309

**PIETRANTONI MENDEZ & ALVAREZ LLC**

Popular Center – 19th Floor  
208 Ponce de León Avenue  
San Juan, PR 00918  
Tel. 787-274-1212  
Fax. 787-274-1470

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

/s/ Giselle López Soler

Giselle López Soler  
USDC No. 224010

**LAW OFFICES OF GISELLE LÓPEZ SOLER**

PMB 257  
Rd. 19 1353  
Guaynabo, PR 00966  
Tel. (787) 667-0941

*Attorney for the Government  
Development Bank for Puerto Rico*