

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

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

PROMESA  
Title III

No. 17 BK 04780-LTS

Court Filing Relates Only to  
PREPA and Shall Only be Filed in  
Case No. 17 BK 4780-LTS

**MOTION TO FILE UNDER SEAL**

To the Honorable United States District Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, “Assured”) and Syncora Guarantee Inc. (“Syncora”) respectfully submit this motion to file under seal (“Motion to Seal”) and hereby state as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On February 1, 2018, Assured and Syncora filed a public redacted version of *Objection of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. to the Urgent Joint Motion of Financial Oversight and Management Board for Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority for Entry of Interim and Final Orders (a) Authorizing Postpetition Secured Financing, (b) Granting Priming Liens and Providing Superpriority Administrative Expense Claims, (c) Modifying the Automatic Stay, (d) Scheduling a Final Hearing, and (e) Granting Related Relief* (the “Objection”) (Case No. 17 BK 04780-LTS, ECF No. 585). The Objection contained redactions and Exhibit C to the Objection (ECF No. 585-3) was filed under seal.

2. It is necessary to seal and restrict access to the unredacted version of the Objection and Exhibit C because they contain information provided to Assured and Syncora by the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority (the “Movants”) on a confidential basis. As such, Assured and Syncora respectfully request that the unredacted version of the Objection and Exhibit C be sealed.

3. To prevent the unredacted version of the Objection and Exhibit C from being made part of the public record, Assured and Syncora respectfully request that this Court grant this Motion to Seal permitting the parties to make a restrictive filing of the Objection and Exhibit C. Assured and Syncora request that only this Court and the Movants have access to the Objection and Exhibit C unless and until Assured, Syncora, or the Movants inform the Court otherwise.

4. For these reasons, Assured and Syncora respectfully request that this Honorable Court take notice of the above and enter an order, substantially in the form attached hereto as Exhibit A, granting leave to file the Objection and Exhibit C under seal.

Dated: San Juan, Puerto Rico  
February 13, 2018

CASELLAS ALCOVER & BURGOS P.S.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case. Further, I directed that the following counsel of record be served by U.S. Mail:

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At San Juan, Puerto Rico, this 13th day of February, 2018.

/s/ Heriberto J. Burgos Pérez  
Heriberto J. Burgos Pérez  
USDC-PR 204806

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

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The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
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Title III

No. 17 BK 04780-LTS

**[PROPOSED] ORDER GRANTING MOTION TO FILE UNDER SEAL**

The Court has received and reviewed the motion to file under seal (the “Motion”) of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, “Assured”), and Syncora Guarantee Inc. (“Syncora”). Assured and Syncora seek to file under seal an unreacted version of the *Objection of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. to the Urgent Joint Motion of Financial Oversight and Management*

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*Board for Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority for Entry of Interim and Final Orders (a) Authorizing Postpetition Secured Financing, (b) Granting Priming Liens and Providing Superpriority Administrative Expense Claims, (c) Modifying the Automatic Stay, (d) Scheduling a Final Hearing, and (e) Granting Related Relief* (Case No. No. 17 BK 04780-LTS, ECF No. 585) and Exhibit C thereto (ECF No. 585-3). Based on the representations made in the Motion, the Motion is granted pending further order of the Court.

The Clerk of Court will provide Assured, Syncora and the following parties who have appeared in these Title III proceedings access to the sealed materials, through their counsel of record:

1. The Financial Oversight and Management Board for Puerto Rico; and
2. The Puerto Rico Fiscal Agency and Financial Advisory Authority.

This order resolves docket entry no. \_\_\_\_ in Case No. 17-4780.

SO ORDERED.

Dated: February \_\_\_\_, 2018

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LAURA TAYLOR SWAIN  
United States District Judge