

**UNITED STATES DISTRICT COURT
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.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION REGARDING THE STATUS OF THE
GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO'S
PRODUCTION OF DOCUMENTS TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS AND THE OFFICIAL COMMITTEE OF
RETIRED EMPLOYEES OF THE COMMONWEALTH OF PUERTO RICO**

To the Honorable Judith Gail Dein
United States Magistrate Judge:

The Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF"), through its undersigned counsel, hereby states and prays as follows:

1. On June 6, 2018, this Court held a hearing on the Renewed Motion of Creditors' Committee Seeking Entry of Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program with Respect to Certain Causes of Puerto Rico Financial Crisis Beginning on August 15,

¹ 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 (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).

2018 (Dkt. No. 3066) (the “Renewed Motion”). On June 7, 2018, this Court entered an Order, dated June 6, 2018, which (among other things) ordered AAFAF to file a status report on June 13, 2018, in preparation for the June 18, 2018 continued hearing on the Renewed Motion.

2. On June 8, 2018, AAFAF, on behalf of the Government Development Bank for Puerto Rico (“GDB”), produced 5,768 non-privileged documents to counsel to the Official Committee of Unsecured Creditors (the “UCC”) and the Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “Retiree Committee,” and together with the UCC, the “Committees”). These documents represent the full set of non-privileged documents produced by AAFAF on behalf of GDB and other instrumentalities of the Government of Puerto Rico to the Independent Investigator to date. By written agreement, AAFAF and GDB produced the documents to counsel to the Committees on a Professionals’-Eyes-Only basis pending the execution of a formal Non-Disclosure Agreement (“NDA”). To the extent that AAFAF, on behalf of GDB, produces additional documents to the Independent Investigator, AAFAF will contemporaneously produce any non-privileged documents to the Committees.

3. On June 11, 2018, AAFAF, on behalf of GDB, sent counsel to the Committees a draft NDA between GDB and the Committees.

4. On June 13, 2018, counsel for AAFAF, on behalf of GDB, met and conferred with counsel to the Committees concerning the draft NDA and the form of any privilege log. The Committees agreed to send comments to the draft NDA, and the parties are continuing to negotiate the proper form of a privilege log, among other issues.

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Dated: June 13, 2018
San Juan, Puerto Rico

Respectfully submitted,

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