

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re :
 : PROMESA
 THE FINANCIAL OVERSIGHT AND : Title III
 MANAGEMENT BOARD FOR PUERTO RICO, :
 :
 as representative of : Case No. 17-BK-3283 (LTS)
 :
 THE COMMONWEALTH OF PUERTO RICO, : (Jointly Administered)
et al.,¹ :
 :
 Debtors. :
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In re :
 : PROMESA
 THE FINANCIAL OVERSIGHT AND : Title III
 MANAGEMENT BOARD FOR PUERTO RICO, :
 :
 as representative of : Case No. 17-BK-4780 (LTS)
 :
 PUERTO RICO ELECTRIC POWER :
 AUTHORITY, :
 :
 Debtor. :
 :
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**RESERVATION OF RIGHTS OF SOLA LTD, SOLUS OPPORTUNITIES FUND 5 LP,
 ULTRA MASTER LTD, AND ULTRA NB LLC TO OMNIBUS MOTION BY THE
 FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,
 ACTING BY AND THROUGH THE MEMBERS OF THE SPECIAL CLAIMS
 COMMITTEE, AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
 TO (I) ESTABLISH LITIGATION CASE MANAGEMENT PROCEDURES AND
 (II) ESTABLISH PROCEDURES FOR THE APPROVAL OF SETTLEMENTS**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy 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).

SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra NB LLC (collectively, “Solus”) respectfully submit this reservation of rights to the *Omnibus Motion by the Financial Oversight Management Board for Puerto Rico, Acting by and Through the Members of the Special Claims Committee, and the Official Committee of Unsecured Creditors to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for the Approval of Settlements* (ECF. No. 7325 in Case No. 17-03283) (the “Motion”).²

Solus reserves all of its rights to object to the application of the Avoidance Action Procedures to any proceeding that may be listed on any supplemental or amended Appendix.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 17th day of June, 2019.

WE HEREBY CERTIFY that on this same date a true and correct copy of this objection and reservation of rights was filed with the Clerk of the Court using the CM/ECF system, which will notify counsel of record.

² Capitalized terms have the same meanings ascribed to them in the Motion.

/s/ Jose L. Ramirez-Coll

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