

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

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)	
)	PROMESA
)	Title III
THE FINANCIAL OVERSIGHT AND)	
MANAGEMENT BOARD FOR PUERTO RICO,)	No. 17 BK 3283-LTS
)	
as representative of)	(Jointly Administered)
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	Re: ECF No. 21902
)	
Debtors. ¹)	
)	
	x	

**URGENT MOTION OF GREENBERG TRAURIG, LLP
FOR EXTENSION OF TIME TO RESPOND TO ORDER TO SHOW
CAUSE REGARDING NON-COMPLIANCE WITH THE PUERTO RICO
RECOVERY ACCURACY IN DISCLOSURES ACT
AND THE COURT’S ORDERS RELATED THERETO**

Greenberg Traurig, LLP (“Greenberg Traurig”) hereby submits the following urgent motion for an extension of time to the Court’s *Order to Show Cause Regarding Non-Compliance with the Puerto Rico Recovery Accuracy in Disclosures Act and the Court’s Orders Related Thereto* dated August 23, 2022 (the “Order to Show Cause”) and respectfully states as follows:

1. In or about July 2017, Greenberg Traurig was engaged by AAFAF as fiscal agent for PREPA to advise AAFAF in respect of various issues associated with PREPA’s ongoing operational and financial restructuring. Greenberg Traurig was replaced as counsel for AAFAF as fiscal agent for PREPA in the fall of 2018 when it was replaced as counsel by O’Melveny & Myers.

2. In or about July 2017, Greenberg Traurig was also engaged by PREPA to advise PREPA in respect of various issues associated with its ongoing operational and financial

restructuring. Greenberg Traurig's contract with PREPA was renewed several times, with the scope of services to be performed by Greenberg Traurig expanding and contracting over time in connection with the terms of such renewals. Greenberg Traurig continued to serve as counsel to PREPA in connection with Cobra Acquisition LLC's motion to compel payment until late 2019. Greenberg Traurig continued to provide additional legal services to PREPA until approximately October 2020.

3. Greenberg Traurig has not performed services on behalf of PREPA since October 2020 and will not be performing any such services for the remainder of these cases.

4. Greenberg Traurig will be filing fee applications to cover the work performed through the conclusion of its PREPA engagement in October 2020.

5. Greenberg Traurig was made aware of this Court's Order to Show Cause by counsel to the Commonwealth of Puerto Rico just this morning, August 30, 2022.

6. By this emergency request, Greenberg Traurig respectfully requests a brief, three-week extension of time until September 20, 2022, to file its response after completing the appropriate conflicts analysis. Greenberg Traurig has conferred with counsel to the Oversight Board, who does not oppose Greenberg Traurig's request for an extension.

7. Greenberg Traurig certifies that: (A) it has carefully examined the matter and has concluded that there is a true need for an extension; (B) has not created the urgency through any lack of due diligence, as Greenberg has not represented PREPA in this matter in nearly two years and just became aware of the Order to Show Cause today; and (C) Greenberg will continue to work with counsel with the Oversight Board to resolve this matter without a hearing.

WHEREFORE, Greenberg Traurig respectfully requests that this Court approve a three-week extension of time to enable Greenberg Traurig to submit a response consist with the disclosure requirements outlined in The Puerto Rico Recovery Accuracy in Disclosures Act of 2021, Pub. L. No. 117-82.

Dated: August 30, 2022
Boston, Massachusetts

/s/ Joseph P. Davis
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Former Attorneys for PREPA

Dated: August 30, 2022
San Juan, PR

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