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– and –

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Counsel for HSBC Bank USA, N.A. as Trustee and Collateral Agent

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

ODN I Perfuracoes Ltda., et al.,¹

Chapter 15

Case No.: 23-10557 (DSJ)

Debtors in a Foreign Proceeding

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

¹ The debtors in these chapter 15 cases (the "<u>Chapter 15 Cases</u>"), along with each debtor's tax identification or corporate registry number, are: ODN I Perfurações Ltda. (CNPJ/ME No. 11.165.868/0001-68) ("<u>ODN I Perfurações</u>"), Odebrecht Drilling Norbe VIII/IX Ltd. (No. MC 245888) ("<u>Norbe VIII/IX</u>"), Odebrecht Drilling Norbe Eight GmbH (No. FN 34216i) ("<u>Norbe Eight</u>"), Odebrecht Drilling Norbe Nine GmbH (No. FN 342214g) ("<u>Norbe Nine</u>"), Odebrecht Offshore Drilling Finance Limited (No. MC 277889) ("<u>OODFL</u>"), ODN I GmbH (No. FN 321008x) ("<u>ODN I</u>"), Odebrecht Drilling Norbe Six GmbH (No. FN 347728s) ("<u>Norbe Six</u>") and ODN Tay IV GmbH (No. FN 353359x) ("<u>Tay IV</u>").

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PLEASE TAKE NOTICE that the undersigned appear in the above-captioned chapter 15 cases as counsel to HSBC Bank USA, N.A., as trustee and collateral agent for the 2022 notes ("<u>HSBC</u>"), and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>") and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "<u>Bankruptcy Code</u>"), respectfully request that all notices, pleadings and other papers served or required to be served in these proceedings, be served upon:

Craig E. Reimer Lisa Holl Chang MAYER BROWN LLP 71 South Wacker Drive Chicago, IL 60606 Tel: (312) 782-0600 Fax: (312) 706-8236 <u>E-mail: creimer@mayerbrown.com</u> Email: lhollchang@mayerbrown.com Dabin Chung MAYER BROWN LLP 1221 Avenue of the Americas New York, NY 10020-1001 Tel: (212) 506-2527 Fax: (212) 849-5570 E-mail: dchung@mayerbrown.com

PLEASE TAKE NOTICE that HSBC intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive (1) its right to have final orders in noncore matters entered only after *de novo* review by a United States District Court Judge, (2) its right to a trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) its right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, recoupments or remedies to which it is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments and remedies it expressly reserves.

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Dated: May 2, 2023 New York, New York

/s/ Dabin Chung

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-and-

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CERTIFICATE OF SERVICE

I herby certify that a true and correct copy of the foregoing was served upon all parties of record in this matter via filing with the Court's CM/ECF system this [•] day of May.

/s/ <u>Dabin Chung</u> Dabin Chung