



Oscar Pinkas
Tel 212.801.9214
Fax 212.801.6400
pinkaso@gtlaw.com

December 19, 2023

Honorable John P. Mastando III
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: *In re Inversiones Latin America Power, Ltda., et al.*, Case No. 23-11891 (JPM)

Dear Judge Mastando,

Inversiones Latin America Power Ltda., San Juan S.A. and Norvind S.A., the debtors in the above-identified chapter 11 cases (collectively, the “Debtors”), by and through their proposed counsel in these chapter 11 cases, write this letter for a modification to, or relief from, two procedural rules detailed in Your Honor’s Chambers Rules.

First, we respectfully request that Mr. Esteban Moraga Morales, the Chief Executive Officer of the Debtors who is the first day declarant, be permitted to attend the hearing scheduled for January 3, 2024 at 10:00 a.m. (Eastern Time) (the “Hearing”), including any continuation of the Hearing, remotely via Zoom for Government. The Debtors seek such authorization on the grounds that Mr. Moraga is based in Chile, and it would be a more efficient use of estate resources for Mr. Moraga to attend the Hearing remotely; moreover, we anticipate the Hearing will be consensual.

Second, in advance of the Hearing, the Debtors will file a brief (the “Confirmation Brief”) in support of confirmation of the chapter 11 plan filed at ECF No. 11 (as may be amended, the “Plan”) and the adequacy of the disclosure statement related to the Plan filed at ECF No. 12 (as may be amended, the “Disclosure Statement”). Your Honor’s Chambers Rules limit moving briefs to no more than 30 pages in length. We respectfully request an increase of the page limit to 80 pages (exclusive of the table of contents and authorities) such that we can appropriately and completely address the reasons supporting confirmation of the Plan and approval of the Disclosure Statement.

Prior to filing this letter, we reviewed the foregoing requests with the following parties in interest or their counsel: (a) the Office of the United States Trustee for the Southern District of New York; (b) the Ad Hoc Group of Noteholders; (c) UMB Bank, N.A.; and (d) the LC Facility Agent and the Lenders under the LC Facility Agreement. The Debtors submit that none of the aforementioned parties raised any objections to either request.

Honorable John P. Mastando, III
December 19, 2023
Page 2

Accordingly, we respectfully request the authority for (a) Mr. Esteban Moraga Morales to attend the Hearing, including any continuation of the Hearing, remotely via Zoom for Government, and (b) the Debtors to file a Confirmation Brief that exceeds 30 pages, not to exceed 80 pages.

Respectfully Submitted,

/s/ Oscar N. Pinkas

Oscar N. Pinkas
Shareholder, Greenberg Traurig

*Proposed Attorneys for the Debtors and
Debtors in Possession*

The following requests are GRANTED:

- (i) Mr. Esteban Moraga Morales is permitted to attend the Hearing currently scheduled for January 3, 2024, at 10:00 a.m. (Eastern Time), as well as any continuation of that Hearing, remotely via Zoom.
- (ii) The page limit applicable to the briefs supporting the Debtor's proposed Plan and Disclosure Statement is increased to 80 pages, excluding tables of contents and authorities.

SO ORDERED.

Dated: New York, New York
December 28, 2023

/S/ John P. Mastando III
HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE