UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	)	
	)	Case No. 26-11522 (MEW)
Braskem S.A., *et al*.[1]	)	
	)	Chapter 15
Debtors in a Foreign Proceeding.	)	(Jointly Administered)
	)	

REVISED RECOGNITION HEARING
MANAGEMENT AND SCHEDULING ORDER

This Recognition Hearing Management and Scheduling Order[2] is entered by the Court, following a Scheduling Conference held on August 25, 2026, in accordance with the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), as made applicable by Bankruptcy Rule 1018, and the Federal Rules of Civil Procedure ("Civil Rules") 16(b) and 26(f). No objections were filed during the prescribed objection period.

1. All discovery concerning the *Amended Petitioner's Declaration and Verified Petition for Recognition of the Brazilian Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105(a), 1515, 1517, 1520, and 1521* [ECF No. 18] (the "Verified Petition"), and the *Petitioner's Verified Supplement to Verified Petition for Recognition of the Brazilian Proceeding and Motion for Extension of Provisional Relief* [ECF No. 48] (the "Verified Supplement" and, together with the Verified Petition, the "Petition") shall be conducted in accordance with the Civil Rules, Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules")

[1] The debtors in these chapter 15 cases, along with the last four digits of each debtor's tax identification number in their applicable jurisdiction of incorporation, are as follows: Braskem S.A. (01-70 – Brazil); Braskem Netherlands B.V. (6B01 – Netherlands); Braskem Netherlands Inc., B.V. (9B01 – Netherlands); Braskem Netherlands Finance B.V. (5B01 – Netherlands); Braskem Trading & Shipping B.V. (7B01 – Netherlands); and Braskem America Finance Co. (1581 – US).

[2] This Order shall govern only the relief sought in the Petition. For the avoidance of doubt, nothing herein shall be interpreted or construed to govern any future motion to enforce any EJ Plan.

and the Local Rules of the Bankruptcy Court for the Southern District of New York ("Local Bankruptcy Rules").

2. Fact Discovery:[3]

a. Any party-in-interest or parties-in-interest intending to oppose Recognition and participate in discovery[4] (together with the Debtors, the "Participating Party" or "Participating Parties") shall provide notice to the Foreign Representative of such intent on or before Thursday, September 3, 2026.

b. All Participating Parties shall serve written discovery requests, if any, on or before Wednesday, September 9, 2026.

c. All responses and objections to any written discovery shall be served on or before Friday, September 18, 2026.

d. All document productions, if any, shall be completed on or before Friday, October 9, 2026, with document production to commence, on a good faith basis, on a rolling basis at the earliest possible time.

e. All final interrogatories and requests for admission, if any, shall be served on or before Monday, October 19, 2026.

f. All fact discovery, including depositions, shall be completed on or before Monday, November 9, 2026.

3. Expert Discovery:

---

[3] All discovery shall be subject to and conducted in accordance with the terms of the *Stipulated Confidentiality Agreement and Protective Order* [ECF No. 46] (the "Protective Order") and the *Stipulation and Order Regarding Joint Protocol for ESI and Document Production* [ECF No. 45] entered by this Court.

[4] To the extent any party fails to provide such notice and later serves discovery, the Foreign Representative reserves the right to (a) seek modification of this schedule and (b) serve discovery on such party.

a. Any Participating Party proffering expert testimony, other than that contained in the Laquimia Declaration,[5] shall: (i) notice their intent to produce expert testimony and topics no later than September 9, 2026; and (ii) notice their intent to rely on reply experts for topics noticed pursuant to paragraph 3(a)(i) no later than September 11, 2026. To the extent Participating Parties providing notice under paragraphs 3(a)(i) or 3(a)(ii) notice an intent to raise issues of foreign law, such Participating Parties shall file with the Court and serve a statement pursuant to Rule 44.1 of the Civil Rules (a "Rule 44.1 Notice").

b. All Participating Parties who provided notice under paragraphs 3(a)(i) or 3(a)(ii) shall identify the experts, if any, they intend to proffer no later than Friday, September 18, 2026. Such notice identifying experts shall be served on all Participating Parties who have filed a Rule 44.1 Notice.

c. All declarations of expert opinions and qualifications, if any, shall be served on or before Wednesday, September 30, 2026.

d. All expert rebuttal testimony and supporting documents, if any, shall be served on or before Wednesday, October 14, 2026.

e. Depositions of expert witnesses shall be completed no later than Monday, November 9, 2026.

4. The Participating Parties may agree in writing (with email being sufficient) to modify the dates provided in paragraphs 2 or 3 without further order of the Court.

5. Additional Pleadings:

[5] The "Laquimia Declaration" refers to the *Declaration of Ana Elisa Laquimia Pursuant to 28 U.S.C. § 1746 in Support of the Verified Petition for Recognition of the Brazilian Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105(a), 1515, 1517, 1520 and 1521* [ECF No. 4].

a. Any oppositions to the Petition, including any arguments concerning summary judgment and supporting materials, shall be filed on or before 11:59 p.m. Friday, November 20, 2026. All such briefs shall be limited to 40 pages (not including any supporting affidavits, declarations or exhibits).

b. Replies and other pleadings in support of the Petition, including any response to arguments concerning summary judgment, if any, shall be filed on or before 11:59 p.m. Thursday, December 3, 2026. Such pleadings shall be limited to 40 pages (not including any supporting affidavits, declarations or exhibits).

c. Nothing herein shall prejudice or abridge the rights of Participating Parties to file any other or further motion or pleading permitted by the Bankruptcy Rules.

6. All pleadings concerning the Petition shall be served promptly after filing. All pleadings, and courtesy copies of pleadings, shall be double-spaced, 12-point font, with 1" margins and include a table of contents listing all affidavits and exhibits. Affidavits and exhibits shall be clearly identified by tabs on both the original and courtesy copies. Exhibits shall be marked sequentially such that no exhibit number or letter repeats, regardless of the affidavit to which it is attached. Exhibits for the Foreign Representative should be marked by letters; exhibits for Participating Parties other than the Foreign Representative should be marked by numbers.

7. The Participating Parties shall submit a proposed Joint Pretrial Conference Order on or before Thursday, December 3, 2026. The proposed Joint Pretrial Conference Order shall be prepared using the form of order provided on the Court's website at https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nysb.uscourts.gov%2Fsites%2Fdefault%2Ffiles%2Fsample_JPTO.docx&wdOrigin=BROWSELINK. Any witnesses identified to testify at the Recognition Hearing in the Joint Pretrial Conference Order who have

not previously been deposed shall be made available for deposition before the Recognition Hearing, the specific date and time to be mutually agreed upon by the parties.

8. In the event of any discovery dispute in this action, the relevant Participating Parties shall first meet and confer in an effort to resolve the dispute. If the relevant Participating Parties are unable to resolve the dispute, counsel for any Participating Party seeking assistance from the Court shall, before filing any discovery motion, arrange a conference call with the Court with all counsel involved in the dispute and the relevant Participating Parties may each submit to Chambers a letter—not to exceed three single-spaced pages—previewing their respective positions prior to such conference call with the Court. The Court will endeavor to resolve the dispute without the filing of any discovery motions.

9. The Pretrial Conference shall be held on Friday, December 4, 2026 at 11:00 AM (prevailing New York time). Unless the Court provides otherwise, parties wishing to participate in a hearing telephonically must register with Zoom for Government. Information on how to register with Zoom For Government can be found on the Judge's Chambers page at https://www.nysb.uscourts.gov/content/judge-michael-e-wiles#. Parties who wish to (i) participate "live" or (ii) listen only to a hearing telephonically may do so without requesting permission from Chambers. Parties need to register for an eCourtAppearance by 4 PM the business day before the hearing at http://www.nysb.uscourts.gov/ecourt-appearances.

10. The Recognition Hearing shall be held on Tuesday, December 8, 2026 at 11 a.m. (prevailing New York time). Absent further order from the Court, witnesses and counsel for any party wishing to participate must participate in the Recognition Hearing in person. Requests for remote appearance shall be submitted to the Court at least 7 days prior.

11. The Participating Parties agree to be bound by the terms of this Order as of the date it is submitted to the Court.

12. Unless otherwise specified, this Order may not be modified or the dates herein extended, except by further Order of this Court for good cause shown. Any application to modify or extend any deadline established by this Order shall be made in a written application no less than three (3) days prior to the expiration of the date sought to be extended.

Dated: September 30, 2026
New York, New York

s/Michael E. Wiles
THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE