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*Attorneys for Antonio Reinaldo Rabelo Filho,  
as Petitioner and Foreign Representative*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Americanas S.A., *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding.

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)  
)  
) Case No. 23-10092 (MEW)  
)  
) Chapter 15  
) (Jointly Administered)  
)

**MOTION PURSUANT TO FEDERAL RULES OF BANKRUPTCY PROCEDURE  
2002(m) AND (q) AND 9007 FOR ORDER SCHEDULING HEARING AND  
APPROVING FORM AND MANNER OF SERVICE OF NOTICE**

Antonio Reinaldo Rabelo Filho (the “**Petitioner**” or the “**Foreign Representative**”), the  
duly-authorized foreign representative of Americanas S.A. (“**Americanas**”), JSM Global S.à.r.l.  
 (“**JSM Global**”), and B2W Digital Lux S.à.r.l. (“**B2W Digital**,” together with Americanas and  
JSM Global, the “**Chapter 15 Debtors**”) in the jointly-administered judicial reorganization

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<sup>1</sup> 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: Americanas S.A. (06-60 - Brazil); JSM Global S.à.r.l. (5670 - Grand Duchy of Luxemburg); and B2W Digital Lux S.à.r.l. (8659 – Grand Duchy of Luxemburg).

(*recuperação judicial* or “**RJ**”) proceeding (the “**Brazilian RJ Proceeding**”) of the Chapter 15 Debtors and certain of their affiliated debtors (collectively, the “**RJ Debtors**” or the “**Americanas Group**”) commenced on January 19, 2023 pursuant to Federal Law No. 11.101 of February 9, 2005 (as modified, the “**Brazilian Bankruptcy Law**”), of the laws of the Federative Republic of Brazil (“**Brazil**”), pending before the 4th Business Court of Rio de Janeiro (the “**Brazilian RJ Court**”),<sup>2</sup> by and through his undersigned counsel, respectfully submits this motion (the “**Motion**”) in the above-captioned chapter 15 cases (the “**Chapter 15 Cases**”) for entry of an order substantially in the form annexed hereto as **Exhibit A** (the “**Proposed Order**”) (i) scheduling a hearing on the relief sought in the *Petitioner’s Declaration and Verified Petition for Recognition of the Brazilian RJ Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105(a), 1509, 1515, 1517, 1520, and 1521* (the “**Verified Petition**”)<sup>3</sup> [ECF No. 3] and the forms of voluntary petition [ECF No. 1] (collectively, the “**Forms of Voluntary Petition**” and, together with the Verified Petition, the “**Petition**”) both of which were filed on January 25, 2023, (ii) setting the deadline by which any responses or objections to the Verified Petition must be filed with the Court and received by the Petitioner, (iii) approving the form and manner of service thereof, and (iv) granting such other relief as the Court deems just and proper.

In support of this Motion, the Petitioner relies upon and incorporates by reference the *Declaration of Francisco Satiro Pursuant to 28 U.S.C. § 1746 in Support of the Petitioner’s Declaration and Verified Petition for Recognition of the Brazilian RJ Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105(a), 1509, 1515, 1517, 1520, and 1521* (the “**Brazilian Counsel Declaration**”) filed on January 25, 2023, along with the exhibits thereto.

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<sup>2</sup> The case number for the Brazilian RJ Proceeding before the Brazilian RJ Court is 0803087-20.2023.8.19.0001.

<sup>3</sup> Capitalized terms used but not otherwise defined shall have the meanings ascribed to such them in the Verified Petition.

In further support of the relief requested herein, the Petitioner respectfully represents to the Court as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference from the United States District Court for the Southern District of New York dated January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11*, 12 Misc. 00032 (S.D.N.Y. Feb. 2, 2012) (Preska, C.J.). This is a core proceeding under 28 U.S.C. § 157(b)(2)(P). Venue is proper in this Court pursuant to 28 U.S.C. § 1410.

### **BACKGROUND**

2. The relevant factual background with respect to the relief sought in this Motion is set forth in the Verified Petition. The Court may find therein a description of the Brazilian RJ Proceeding of the Chapter 15 Debtors and of their affiliate, the Chapter 15 Debtors' businesses, corporate and capital structures, and the circumstances leading to the commencement of the Brazilian RJ Proceeding and these Chapter 15 Cases.

### **RELIEF REQUESTED**

3. By this Motion, the Petitioner seeks entry of an order, substantially in the form of the Proposed Order annexed hereto as **Exhibit A**: (i) setting [●], 2023 at [●][●].m. (New York time) as the date (the "**Recognition Hearing Date**") for the hearing (the "**Recognition Hearing**") on the relief sought in the Verified Petition; (ii) setting [●], 2023 at [●] [●].m. (New York time) as the deadline by which any responses or objections to the Verified Petition must be filed with the Court and received by the Petitioner (the "**Objection Deadline**"); (iii) approving the form of notice of the filing of the Verified Petition, the Recognition Hearing Date, and the Objection

Deadline (the “**Recognition Hearing Notice**”) that is attached as Exhibit 1 to the Proposed Order; and (iv) granting related relief as provided herein.

**BASIS FOR RELIEF**

4. Rule 2002(q)(1) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) provides that the parties identified therein and “such other entities as the court may direct” must be given at least 21 days’ notice of a hearing on a petition for recognition of a foreign proceeding. Fed. R. Bankr. P. 2002(q)(1). Bankruptcy Rules 2002(m) and 9007 provide, among other things, that when notice is to be given under the Bankruptcy Rules, the court shall designate the form and manner in which such notice shall be given (provided the Bankruptcy Rules do not otherwise specify the appropriate form and manner of such notice). Fed. R. Bankr. P. 2002(m), 9007.

5. The Petitioner proposes to (i) serve (a) the Recognition Hearing Notice, (b) the Verified Petition, and (c) the Brazilian Counsel Declaration (collectively, the “**Notice Documents**”) by electronic mail to the extent email addresses are available, and otherwise by U.S. mail, first-class postage prepaid (or equivalent service), upon the parties (the “**Notice Parties**”) set forth in Exhibit B annexed hereto (the “**Notice List**”), in accordance with Bankruptcy Rules 2002(k) and (q) and Rules 2002-1, 9006-1(b) and 9013-1(b) of the Local Rules for the Southern District of New York (the “**Local Rules**”), (ii) provide the Notice Documents to Deutsche Bank Trust Company Americas (the “**Indenture Trustee**”) under the Notes Indentures with instructions to forward the Notice Documents on behalf of the Petitioner to the Depository Trust Company (the “**DTC**”), in its capacity as the record holder of the B2W Digital Notes and the JSM Global Notes (collectively, the “**NY Notes**”) and to instruct the DTC to disseminate the same according to the

DTC's customary practices, and (iii) publish the Recognition Hearing Notice on the Chapter 15 Debtors' website (<https://ri.americanas.io/en/investor-information/download-center/>).

6. The Petitioner will complete such notice within two (2) business days of entry of the Proposed Order and respectfully submits that such notice constitutes adequate and sufficient notice of these Chapter 15 Cases, the relief sought in the Petition, the time fixed for filing objections to such relief, and the time, date, and place of the Recognition Hearing.<sup>4</sup>

7. In addition, if any party files a notice of appearance in this case, the Petitioner proposes to serve the Notice Documents and subsequent notices upon such party within three (3) business days of the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

8. Accordingly, the Petitioner respectfully requests that this Court approve the foregoing manner of notice and service of the Notice Documents pursuant to Bankruptcy Rules 2002(m) and (q) and 9007.

9. Bankruptcy Rule 1011(b) provides, among other things, that a party objecting to a chapter 15 petition has 21 days from the date of service of the petition to respond to such petition. *See* Fed. R. Bankr. P. 1011(b). Bankruptcy Rule 1012(b) provides that a party objecting to a petition filed to commence an ancillary proceeding under chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”) has until seven (7) days before the date set for hearing to respond, unless the court orders otherwise. *See* Fed. R. Bankr. P. 1012(b). In light of these requirements, the Petitioner respectfully submits that setting (i) [●], 2023 at [●] [●].m. (New York time) as the Recognition Hearing Date and (ii) [●], 2023 at [●][●].m. (New York time) as the Objection Deadline is appropriate.

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<sup>4</sup> The Petitioner will serve the Recognition Hearing Notice on the Notice Parties once such notice is approved by the Court.

10. Section 1514(c) of the Bankruptcy Code provides that when notice of the commencement of a case under the Bankruptcy Code is given to foreign creditors, such notification shall indicate, *inter alia*, the time period and place for filing proofs of claim as well as whether such filing is necessary for secured creditors. 11 U.S.C. § 1514(c). It is generally accepted, however, that section 1514 does not apply in a chapter 15 case. As explained in Collier on Bankruptcy, section 1514 is the “last in a series of sections dealing with the international aspects of cases under chapters *other than chapter 15* that began with section 1511.” 8 Alan N. Resnick & Henry J. Sommer, *Collier on Bankruptcy* ¶ 1514.01 (16th ed. rev. 2016) (emphasis added). As such, courts routinely find inapplicable and/or waive the requirements of section 1514 in chapter 15 cases. *See, e.g., In re Olinda Star Ltd (In Provisional Liquidation)*, No. 22-11447 (MG) (Bank. S.D.N.Y. November 3, 2022) [ECF 9]; *In re U.S.J. - Açúcar e Alcool S.A.*, No. 22-10320 (DSJ) (Bank. S.D.N.Y. March 18, 2022) [ECF 9]; *In re Universal Enterprises Ltd.*, No. 21-11745 (MG) (Bank. S.D.N.Y. Oct 8, 2021) [ECF No. 7]; *In re Odebrecht Engenharia e Construção S.A.*, No. 20-12741 (MEW) (Bankr. S.D.N.Y. Nov. 25, 2020) [ECF No. 10]; *In re Serviços de Petróleo Constellation S.A.*, No. 18-13952 (MG) (Bankr. S.D.N.Y. Dec. 11, 2018) [ECF No. 26]; *In re Oi S.A.*, No. 16-11791 (SHL) (Bankr. S.D.N.Y. June 22, 2016), [ECF No. 21]; *In re OAS S.A.*, 15-10937 (SMB) (Bankr. S.D.N.Y. Apr. 17, 2015), [ECF No. 24]. Given that section 1514(c) does not apply with respect to these Chapter 15 Cases (as the Petitioner has not sought to commence a case under any other chapter of the Bankruptcy Code), the Petitioner respectfully requests that the requirements contained therein are inapplicable or, alternatively, respectfully requests that such requirements be waived by this Court.

**NOTICE**

11. Notice of this Motion will be provided to the Notice Parties set forth in the Notice List. The Petitioner respectfully submits that no other or further notice is required.

**NO PRIOR REQUEST**

12. No previous request for the relief requested herein has been made by the Petitioner to this Court or any other court.

**CONCLUSION**

13. WHEREFORE, the Petitioner respectfully requests that this Court: (i) enter an order, substantially in the form of the Proposed Order annexed hereto as **Exhibit A**, granting the relief requested herein; and (ii) grant such other and further relief as the Court may deem just and proper.

Dated: January 26, 2023

WHITE & CASE LLP

Respectfully submitted,

By: /s/ John K. Cunningham  
John K. Cunningham

WHITE & CASE LLP

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New York, New York 10020

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*Attorneys for Antonio Reinaldo Rabelo Filho,  
as Petitioner and Foreign Representative*



**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Americanas S.A., *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding.

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)  
)  
) Case No. 23-10092 (MEW)  
)  
) Chapter 15  
) (Jointly Administered)  
)

**ORDER PURSUANT TO FEDERAL RULES OF BANKRUPTCY  
PROCEDURE 2002(m) AND (q) AND 9007 SCHEDULING  
HEARING AND APPROVING FORM AND MANNER OF SERVICE OF NOTICE**

Upon the filing of the *Motion Pursuant to Federal Rules of Bankruptcy Procedure 2002(m) and (q) and 9007 for Order Scheduling Hearing and Approving Form and Manner of Service of Notice* (the “**Motion**”),<sup>2</sup> the Petitioner, as the duly-authorized foreign representative (as such term is defined in section 101(24) of the Bankruptcy Code) in respect of the Brazilian RJ Proceeding, requests entry of this order (this “**Order**”) (i) scheduling a hearing on the relief sought in the Petition, (ii) setting the deadline by which any responses or objections to the Verified Petition must be filed with the Court and received by the Petitioner, (iii) approving the form and manner of service thereof, and (iv) granting such other relief as the Court deems just and proper as provided in the Motion; and the Court having found good cause for granting the relief requested therein; and the Court having found that the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to sections 157 and 1334 of title 28 of the United States Code and the

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<sup>1</sup> 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: Americanas S.A. (06-60 - Brazil); JSM Global S.à.r.l. (5670 - Grand Duchy of Luxembourg); and B2W Digital Lux S.à.r.l. (8659 – Grand Duchy of Luxembourg).

<sup>2</sup> Capitalized terms not otherwise defined herein shall carry the meaning ascribed to such term in the Motion or the Verified Petition, as applicable.

Amended Standing Order of Reference from the United States District Court for the Southern District of New York dated January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11*, 12 Misc. 00032 (S.D.N.Y. Feb. 2, 2012) (Preska, C.J.); and the Court having found that this is a core proceeding pursuant to section 157(b)(2)(P) of title 28 of the United States Code; and the Court having found that venue of this proceeding is proper before this Court pursuant to sections 1409 and 1410 of title 28 of the United States Code; and the Court having found adequate and sufficient notice of the Motion has been provided; and no other or further notice being required; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Recognition Hearing shall be held before this Court on [●], 2023 at [●] [●].m. (prevailing Eastern Time) or as soon thereafter as counsel may be heard, before the Honorable Michael E. Wiles. In accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.), a copy of which may be viewed on the Court's website at <http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>, the Recognition Hearing will be conducted telephonically unless otherwise ordered by the Court. Any parties wishing to participate must do so telephonically by making arrangements through CourtSolutions LLC (<http://www.court-solutions.com>).

2. Responses or objections, if any, to the Verified Petition shall be made in writing and shall set forth the basis therefor. Any such responses or objections must be: (i) filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and (ii) served upon counsel to the Petitioner, White

& Case LLP, 1221 Avenue of the Americas, 44th floor, New York, NY 10020-1095 (Attn: John K. Cunningham, Esq. (jcunningham@whitecase.com); Philip M. Abelson, Esq. (philip.abelson@whitecase.com); and Ricardo M. Pasianotto, Esq. (ricardo.pasianotto@whitecase.com)), so as to be received **by 4:00 p.m. (prevailing Eastern Time) on or before [●], 2023.**

3. The seven (7) day objection period under Bankruptcy Rule 1012(b) and Local Rule 9006-1(b) for the Verified Petition is hereby waived.

4. The form of Recognition Hearing Notice, substantially in the form annexed hereto as Exhibit 1, is hereby approved.

5. The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of these Chapter 15 Cases or, to the extent applicable, are hereby waived.

6. Copies of Notice Documents shall be served by electronic mail to the extent email addresses are available, and otherwise by U.S. mail, first-class postage prepaid (or equivalent service), upon the Notice Parties in the manner set forth in the Motion within two (2) business days of entry of this Order.

7. The Petitioner shall cause the Recognition Hearing Notice to be published on the Chapter 15 Debtors' website (<https://ri.americanas.io/en/investor-information/download-center/>) within two (2) business days of entry of this Order.

8. Copies of the Notice Documents shall be provided to the Indenture Trustee with instructions to forward the Notice Documents on behalf of the Petitioner to DTC and to instruct the DTC, as the case may be, to disseminate the Notice Documents to the holders of the NY Notes according to the DTC's customary practices.

9. If any party files a notice of appearance in these cases, the Foreign Representative shall serve a copy of the Notice Documents on such party or its counsel within three (3) business days following the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

10. Service and notice pursuant to this Order shall be good and sufficient service and adequate notice of the filing of the Petition and the Recognition Hearing.

Dated: \_\_\_\_\_, 2023  
New York, New York

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THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Recognition Hearing Notice**

WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, New York 10020-1095  
(212) 819-8200  
John K. Cunningham  
Philip M. Abelson  
Gregory M. Starner  
Ricardo M. Pasianotto (admitted *pro hac vice*)  
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Livy Mezei (admitted *pro hac vice*)

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(305) 371-2700  
Richard S. Kebrdle (admitted *pro hac vice*)

*Attorneys for Antonio Reinaldo Rabelo Filho,  
as Petitioner and Foreign Representative*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Americanas S.A., *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding.

)  
)  
) Case No. 23-10092 (MEW)  
)  
) Chapter 15  
) (Jointly Administered)  
)

**NOTICE OF FILING AND HEARING ON  
PETITION UNDER CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that on January 25, 2023, Antonio Reinaldo Rabelo Filho (the “Petitioner” or “Foreign Representative”), as the duly-authorized foreign representative (as such term is defined in section 101(24) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”)) of the above-captioned debtors (the “Chapter 15 Debtors”), commenced the above-captioned cases under chapter 15 of the Bankruptcy Code (the “Chapter 15 Cases”) by filing the *Petitioner’s Declaration and Verified Petition for Recognition of the Brazilian RJ Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C. §§ 105(a), 1509, 1515, 1517, 1520, and 1521* [ECF No. 3] (the “Verified Petition”) and the forms of voluntary

<sup>1</sup> 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: Americanas S.A. (06-60 - Brazil); JSM Global S.à.r.l. (5670 - Grand Duchy of Luxembourg); and B2W Digital Lux S.à.r.l. (8659 – Grand Duchy of Luxembourg).

petition [ECF No. 1] (collectively, the “Forms of Voluntary Petition” and, together with the Verified Petition, the “Petition”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”) in furtherance of the jointly-administered judicial reorganization (*recuperação judicial* or “RJ”) proceeding (the “Brazilian RJ Proceeding”) of Americanas S.A. (“Americanas”), JSM Global S.à.r.l. (“JSM Global”), and B2W Digital Lux S.à.r.l. (“B2W Digital,” together with Americanas and JSM Global, the “Chapter 15 Debtors”) commenced on January 19, 2023 pursuant to Federal Law No. 11.101 of February 9, 2005 (as modified, the “Brazilian Bankruptcy Law”), of the laws of the Federative Republic of Brazil (“Brazil”), pending before the 4th Business Court of Rio de Janeiro (the “Brazilian RJ Court”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that, among other things, the Petitioner seeks the entry of an order: (a) granting the Petition in the Chapter 15 Cases and recognizing the Brazilian RJ Proceeding as the “foreign main proceeding” for each of the Chapter 15 Debtors pursuant to section 1517 of the Bankruptcy Code; or in the alternative, as a “foreign nonmain proceeding” and granting appropriate relief; (b) finding that the Petitioner is the duly appointed “foreign representative” of the Chapter 15 Debtors within the meaning of section 101(24) of the Bankruptcy Code and is authorized to act on behalf of each of the Chapter 15 Debtors; and (c) granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled a hearing (the “Recognition Hearing”) to consider the relief requested in the Verified Petition for [●], 2023 at [●] [●].m. (prevailing Eastern Time). The Recognition Hearing will be held before the Honorable Judge Michael E. Wiles. In accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.), a copy of which may be viewed on the Court’s website at <http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>, the Recognition Hearing will be conducted telephonically unless otherwise ordered by the Court. Any parties wishing to participate must do so telephonically by making arrangements through CourtSolutions LLC (<http://www.court-solutions.com>).

**PLEASE TAKE FURTHER NOTICE** that copies of the Verified Petition and all accompanying documentation are available to parties in interest on the Court’s Electronic Case Filing System, which can be accessed from the Court’s website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) or upon written request to the Petitioner’s counsel (including by facsimile or e-mail) addressed to:

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1221 Avenue of the Americas  
New York, New York 10020-1095  
Telephone:(212) 819-8200  
Facsimile: (212) 354-8113

or philip.abelson@whitecase.com  
ricardo.pasianotto@whitecase.com  
lilian.marques@whitecase.com

Attn: Philip M. Abelson, Esq.; Ricardo M. Pasianotto, Esq.; Lilian M. Marques, Esq.

**PLEASE TAKE FURTHER NOTICE** that any party in interest wishing to submit a

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<sup>2</sup> The case number for the Brazilian RJ Proceeding before the Brazilian RJ Court is 0803087-20.2023.8.19.0001.



response or objection to the Verified Petition, or the relief requested therein must do so in writing and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules for the United States Bankruptcy Court for the Southern District of New York, and any rules of the Honorable Michael E. Wiles' Chambers, setting forth the basis therefor with specificity. Any such response or objection must be: (i) filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and (ii) served upon counsel to the Petitioner, White & Case LLP, 1221 Avenue of the Americas, 44th floor, New York, NY 10020-1095 (Attn: John K. Cunningham, Esq. ([jcunningham@whitecase.com](mailto:jcunningham@whitecase.com)); Philip M. Abelson, Esq. ([philip.abelson@whitecase.com](mailto:philip.abelson@whitecase.com)); and Ricardo M. Pasianotto, Esq. ([ricardo.pasianotto@whitecase.com](mailto:ricardo.pasianotto@whitecase.com))), so as to be received **by 4:00 p.m. (prevailing Eastern Time) on or before [●], 2023.**

**PLEASE TAKE FURTHER NOTICE** that if no objection is timely filed and served as provided above, the Court may grant the relief requested in the Verified Petition without a hearing or further notice.

**PLEASE TAKE FURTHER NOTICE** that any party in interest objecting to the Verified Petition or the relief requested therein must appear at the Recognition Hearing at the time set forth above (unless ordered otherwise by the Court).

**PLEASE TAKE FURTHER NOTICE** that, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of these Chapter 15 Cases.

**PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

Dated: January 26, 2023

Respectfully submitted,

WHITE & CASE LLP

By: /s/ John K. Cunningham

John K. Cunningham

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New York, New York 10020

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rkebrdle@whitecase.com

*Attorneys for Antonio Reinaldo Rabelo Filho,  
as Petitioner and Foreign Representative*

**Exhibit B**

**Notice List**

**Via E-mail**

<b>Notice Party Name</b>	<b>Notice Party Address</b>
The Honorable Michael E. Wiles	<a href="mailto:Wiles.chambers@nysb.uscourts.gov">Wiles.chambers@nysb.uscourts.gov</a>
<b>The United States Trustee</b>	
Office of the United States Trustee for the Southern District of New York	<a href="mailto:USTP.Region02@usdoj.gov">USTP.Region02@usdoj.gov</a> <a href="mailto:Annie.wells@usdoj.gov">Annie.wells@usdoj.gov</a>
<b>Indenture Trustees and Related Parties</b>	
Hogan Lovells US LLP (Counsel to Deutsche Bank Trust Company Americas)	<a href="mailto:ronald.silverman@hoganlovells.com">ronald.silverman@hoganlovells.com</a> <a href="mailto:robert.ripin@hoganlovells.com">robert.ripin@hoganlovells.com</a>
<b>Counsel</b>	
Basilio Advogados  Salomão, Kaiuca, Abrahão, Raposo e Cotta Advogados  Helio Oliveira (General Counsel)  (Counsel to the Americanas Group)	<a href="mailto:abasilio@basilioadvogados.com.br">abasilio@basilioadvogados.com.br</a> <a href="mailto:paulo.salomao@salomaoadv.com.br">paulo.salomao@salomaoadv.com.br</a> <a href="mailto:Helio.oliveira@americanas.io">Helio.oliveira@americanas.io</a>
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<b>Others</b>	
Depository Trust Company	<a href="mailto:conversionsandwarrantsannouncements@dtcc.com">conversionsandwarrantsannouncements@dtcc.com</a>

	<a href="mailto:legalandtaxnotices@dtcc.com">legalandtaxnotices@dtcc.com</a>
<b>USD SWAP Counterparties</b>	
	To be included.

**Via First Class Mail**

<b>Notice Party Name</b>	<b>Notice Party Address</b>
<b>The United States Trustee</b>	
Office of the United States Trustee for the Southern District of New York	Attn: Annie Wells 201 Varick Street, Suite 1006, New York, NY 10014
<b>Chapter 15 Debtors</b>	
Americanas S.A. JSM Global S.À.R.L. B2W Digital Lux S.à.r.l. (Chapter 15 Debtors)	Attn: Helio Oliveira Rua Sacadura Cabral, No. 102 20081-902, Rio de Janeiro, RJ, Brasil
<b>Indenture Trustees and Related Parties</b>	
Hogan Lovells US LLP (Counsel to Deutsche Bank Trust Company Americas)	Attn: Ronald Silverman Attn: Robert A. Ripin 390 Madison Avenue New York, NY 10017
<b>Counsel</b>	
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