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as Petitioner and Foreign Representative*

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

In re:)	
)	
Oi S.A., <i>et al.</i> , ¹)	Case No. 23-10193 (JPM)
)	
Debtors in a Foreign Proceeding.)	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 February 8, 2023, Antonio Reinaldo Rabelo Filho (the “**Petitioner**” or “**Foreign Representative**”), in his capacity 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

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: Oi S.A. (01-43 – Brazil), Oi Brasil Holdings Coöperatief U.A. (8447 – Netherlands), Portugal Telecom International Finance B.V. (5023 – Netherlands).

“**Chapter 15 Cases**”) by filing the *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), 1509, 1515, 1517, 1520, and 1521* [ECF No. 3] (the “**Verified Petition**”) and the forms of voluntary petition (collectively, the “**Voluntary Petition**,” together with the Verified Petition, the “**Petition**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) seeking recognition of the jointly administered judicial preliminary injunction proceeding (the “**Brazilian Preliminary Proceeding**”) in preparation of a judicial reorganization (*recuperação judicial*) proceeding (the “**Brazilian RJ Proceeding**,” together with the Brazilian Preliminary Proceeding, the “**Brazilian Proceeding**”) pursuant to Federal Law No. 11.101 of February 9, 2005 of the laws of the Federative Republic of Brazil pending before the Seventh Business Court of Rio de Janeiro.²

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 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, with respect to Oi Brasil Holdings Coöperatief U.A. and Portugal Telecom International Finance B.V., as a “foreign nonmain proceeding”); (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 Petition for **March 29, 2023 at 10:00 a.m. (New York time)** before the Honorable John P. Mastando III.

PLEASE TAKE FURTHER NOTICE that, 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 through Zoom for Government videoconference. Parties wishing to appear at the Recognition Hearing must make an electronic appearance through the “eCourtAppearances” tool on the Court’s website (<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>) on or before 4:00 p.m. (New York Time) the business day before the Recognition Hearing (the “**Appearance Deadline**”) and not by emailing or otherwise contacting the Court. Following the Appearance Deadline, the Court will circulate by email the Recognition Hearing’s Zoom link to those parties who have made an electronic appearance. Additional information regarding the Court’s Zoom and hearing procedures can be found on the Court’s website.

² Capitalized terms not otherwise defined herein shall carry the meaning ascribed to such term in 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**”) [ECF No. 13].

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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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 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 Chambers of the Honorable John P. Mastando III, setting forth the basis therefor with specificity. Any such response or objection must be filed electronically with the Court on the Court's electronic case filing system in accordance with 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) and (ii) served upon counsel to the Petitioner, White & Case LLP, 1221 Avenue of the Americas, 44th floor, New York, NY 10020-1095 (Attn: 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. (New York Time) on or before March 22, 2023**, with two copies served upon the Chambers of the Honorable John P. Mastando III, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 501, New York, New York 10004-1408.

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.

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: February 13, 2023

Respectfully submitted,

WHITE & CASE LLP

By: /s/ Philip M. Abelson
Philip M. Abelson

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