IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CDVCTALLEY INTERNATIONAL CORD	
CRYSTALLEX INTERNATIONAL CORP.,)
Plaintiff,)
v.) Misc. No. 17-151-LPS
BOLIVARIAN REPUBLIC OF VENEZUELA,) Materials Submitted for In Camera Review
Defendant.)

SPECIAL MASTER'S UNOPPOSED MOTION TO UNSEAL AND DISCLOSE PORTIONS OF THE EX PARTE TRANSCRIPT

Robert B. Pincus, in his capacity as special master (the "Special Master") in the above-captioned case, respectfully requests the Court's permission to unseal portions of the transcript from the Special Master's August 29, 2024 ex parte conference with the Court, as well as discussion materials that the Special Master presented to the Court during that meeting, and to produce redacted copies of the transcript and discussion materials to Gramercy Distressed Opportunity Fund LLC ("Gramercy"), G&A Strategic, 1 and Girard Street Investment Holdings, LLC ("Girard Street") (together, the "Alter Ego Claimants"). 2 Proposed redacted copies of the transcript and discussion materials will be submitted *in camera* in connection with this motion. The transcript and discussion materials contain a brief discussion of the Special Master's plan to

¹ G&A Strategic Investments I LLC, G&A Strategic Investments II LLC, G&A Strategic Investments III LLC, G&A Strategic Investments IV LLC, G&A Strategic Investments V LLC, G&A Strategic Investments VI LLC, G&A Strategic Investments VII LLC (collectively, "G&A Strategic").

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sale Procedures Order, D.I. 481 (the "Sale Procedures Order"), or the July 27 Order, D.I. 646.

file a motion to enjoin the Alter Ego Claimants from enforcing claims against the Republic or PDVSA by recovering from PDVH or its direct or indirect subsidiaries in other forums.

After the August 29, 2024 ex parte conference, the Special Master filed his Motion to Enjoin the Alter Ego Claimants from Enforcing Claims Against the Republic or PDVSA by Recovering from PDVH or its Subsidiaries in Other Forums (D.I. 1248) ("Motion to Enjoin"), together with a Motion to Expedite (D.I. 1251). On September 11, 2024, in an order granting the Motion to Expedite, the Court indicated its inclination for the Special Master to provide the Alter Ego Claimants a copy of the transcript of the August 29, 2024 ex parte meeting (D.I. 1259). After consideration of the Court's order, the Special Master has no objection to the Alter Ego Claimants' request to disclose portions of both the transcript and the accompanying discussion materials.

Pursuant to the Court's orders stating that transcripts of *ex parte* conferences "will remain sealed until further order of the Court," the Special Master respectfully requests permission to unseal the portions of the August 29, 2024 transcript and discussion materials referencing the now filed Motion to Enjoin, and to provide the proposed, redacted versions of the transcript and accompanying discussion materials that have been submitted *in camera* to the Alter Ego Claimants and the Sale Process Parties. *See* Memorandum Order (D.I. 643); *see also* Memorandum Order (D.I. 559) (ordering the Special Master to "work with the Court to maintain and preserve such sealed transcripts, so they remain available for review should any further order of this or any reviewing court determine that such disclosure is necessary or warranted"). The Special Master also respectfully requests that the Court decide this unopposed motion on an expedited basis in light of the upcoming briefing deadlines on the Motion to Enjoin.

Pursuant to D. Del. LR 7.1.1, the subject of this motion was raised with counsel for the Alter Ego Claimants and the Sale Process Parties, and no party opposed this motion.

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Respectfully submitted,
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