



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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