

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO	:	
RICO,	:	Case No. 17-BK-3283 (LTS)
	:	
as representative of	:	(Jointly Administered)
	:	
THE COMMONWEALTH OF PUERTO	:	
RICO <i>et al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	:	
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THE OFFICIAL COMMITTEE OF	:	
UNSECURED CREDITORS OF THE	:	
COMMONWEALTH OF PUERTO RICO,	:	
	:	
as agent of	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	
MANAGEMENT BOARD FOR PUERTO	:	
RICO	:	
	:	
as representative of	:	Adv. Proc. No. 17-00257-LTS
	:	
THE COMMONWEALTH OF PUERTO	:	
RICO,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
BETTINA WHYTE,	:	
	:	

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) the Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) the Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) the Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.

as agent of	:
	:
THE FINANCIAL OVERSIGHT AND	:
MANAGEMENT BOARD FOR PUERTO	:
RICO	:
	:
as representative of	:
	:
THE PUERTO RICO SALES TAX	:
FINANCING CORPORATION,	:
	:
Defendant.	:
	:
-----	X

**AAFAF’S RESPONSE TO THE JOINT URGENT MOTION OF COMMONWEALTH AGENT AND COFINA AGENT REQUESTING THAT COURT HOLD DECISION ON MOTIONS FOR SUMMARY JUDGMENT IN ABEYANCE FOR 60-DAY PERIOD**

Pursuant to the schedule set by the Court’s Order Scheduling Briefing for Joint Urgent Motion of Commonwealth Agent and COFINA Agent [ECF No. 485], the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) hereby responds to the Joint Urgent Motion of Commonwealth Agent and COFINA Agent Requesting that Court Hold Decision on Motions for Summary Judgment in Abeyance for 60-Day Period [ECF No. 484]. The scheduling of the Court’s decision on the Motions for Summary Judgment filed in the above-captioned adversary proceeding has always been of great importance to the Government of Puerto Rico (the “Government”). The Government does not oppose the Court holding its decision in abeyance for a period of 60 days to allow discussions among all parties regarding the proposed agreement in principle reached by the Commonwealth and COFINA Agents. These discussions must include the Government and various bondholders and other constituents that are not party to the proposed agreement in principle.

The Government is evaluating whether the proposed agreement in principle serves the best interest of Puerto Rico, and will actively work with all parties to reach consensus on a comprehensive restructuring solution.

If consensus is not reached in the next 60 days, decisions on critical issues such as whether the Pledged Sales Taxes are property of the Commonwealth or COFINA should move toward judicial resolution. AAFAF therefore reserves the right to oppose further motions to hold such decisions in abeyance.

Dated: June 11, 2018  
San Juan, Puerto Rico

Respectfully submitted,

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