

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA
Title III

No. 17 BK 3566-LTS

**EXHIBIT LIST OF THE
COMMITTEE OF RETIRED
EMPLOYEES OF THE
COMMONWEALTH OF PUERTO
RICO IN ADVANCE OF JULY 2,
2019 HEARING ON THE MOTION
OF CERTAIN SECURED
CREDITORS OF THE EMPLOYEES
RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE
COMMONWEALTH OF PUERTO
RICO FOR RELIEF FROM THE
AUTOMATIC STAY**

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

The Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “**Retiree Committee**”) hereby files this Exhibit List in Advance of July 2, 2019 Hearing on the Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay (Case No. 17-bk-3283, Dkt. 6904; Case No. 17-bk-3566, Dkt. 289) (the “**ERS Lift Stay Motion**”) filed by certain holders of bonds (the “**Movants**”) issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”). The Retiree Committee may introduce the exhibits listed on Exhibit A, other than for impeachment or rebuttal. The Retiree Committee reserves the right to revise this exhibit list as hearing preparations continue, and to identify additional exhibits as may be necessary at the hearing.

Dated: June 21, 2019

Respectfully submitted,

JENNER & BLOCK LLP

BENNAZAR, GARCÍA & MILIÁN, C.S.P.

By:

/s/ Robert Gordon

Robert Gordon (admitted *pro hac vice*)

Richard Levin (admitted *pro hac vice*)

919 Third Ave

New York, NY 10022-3908

rgordon@jenner.com

rlevin@jenner.com

212-891-1600 (telephone)

212-891-1699 (facsimile)

Catherine Steege (admitted *pro hac vice*)

Melissa Root (admitted *pro hac vice*)

Landon Raiford (admitted *pro hac vice*)

353 N. Clark Street

Chicago, IL 60654

csteege@jenner.com

mroot@jenner.com

lraiford@jenner.com

312-222-9350 (telephone)

312-239-5199 (facsimile)

By:

/s/ A.J. Bennazar-Zequeira

A.J. Bennazar-Zequeira

Héctor M. Mayol Kauffmann

Francisco del Castillo Orozco

Edificio Union Plaza,

1701 Avenida Ponce de León #416

Hato Rey, San Juan

Puerto Rico 00918

ajb@bennazar.org

hector.mayol@bennazar.com

787-754-9191 (telephone)

787-764-3101 (facsimile)

*Counsel for The Official Committee of Retired
Employees of Puerto Rico*

Exhibit A

Ex. No.	Date	Description	Begin Bates	End Bates	Dep. Ex. No.
A	7/10/2018	<i>Objection Of The Official Committee Of Retired Employees Of The Commonwealth Of Puerto Rico To The ERS Bondholders' Motion For Relief From The Automatic Stay (Case No. 17-bk-3283, Dkt. 3468)</i>			
		<i>Objection Of The Official Committee Of Retired Employees Of The Commonwealth Of Puerto Rico To The ERS Bondholders' Motion For Relief From The Automatic Stay (Case No. 17-bk-3566, Dkt. 293)</i>			
B	1/31/2008	Bond Resolution			
C	1/31/2008	\$1,588,810,799.60 Employees Retirement System of the Government of the Commonwealth of Puerto Rico Senior Pension Funding Bonds, Series A	BH-ERS-C-002670	BH-ERS-C-002956	Rodriguez 37 Highley 7
D	8/23/2017	Act No. 106			Yassin 10
E	6/6/2017	House Joint Resolution 188			Yassin 8
F	6/4/2019	Excerpts from the deposition testimony of Luis Rodriguez			
G	6/30/2017	Puerto Rico Government Employees Retirement System, June 30, 2017 Actuarial Valuation Report	BH-ERS-EX-001727	BH-ERS-EX-001795	

H	5/30/2019	Excerpts from the deposition testimony of Francisco Jose Peña Montañez			
I	3/13/2017	Board Resolution Adopted on March 13, 2017 (Fiscal Plan Certification)			Montañez 23
j	5/31/2017	Banco Popular Puerto Rico Government Employees ASR Depositos Operacionales	ERS_LS0002187	ERS_LS0002197	
J	5/31/2017	Banco Popular Puerto Rico Government Employees ASR Pago de Beneficios	ERS_LS0002570	ERS_LS0002570	
J	5/31/2017	Banco Popular Puerto Rico Government Employees Employer Contribution Segregated Account	ERS_LS0002875	ERS_LS0002876	
J	7/31/2017	Banco Popular Puerto Rico Government Employees ASR Post Petition Segregated Account	ERS_LS0003543	ERS_LS0003543	
J	5/31/2017	Statement of Account: Adm Sistemas de Retiro de los Empleados del Gobierno	ERS_LS0003813	ERS_LS0003813	
K	7/25/2017	Letter to Sr. Carlos Garcia Alvira from Luis M. Callazo Rodriguez re transferring \$190,480,000.000.	ERS-AAFAF-LS0001506	ERS-AAFAF-LS0001507	Rodriguez 41
L	5/29/2019	Excerpts from the deposition testimony of Mohammad Saleh Yassin-Mahmud			

M	5/30/2019	Declaration of Gaurav Malhotra in Connection with Motion for Relief from the Automatic Stay			Malhorta 1
N	6/12/2019	Rebuttal Declaration of Gaurav Malhotra in Response to Expert Report of Faten Sabry in Connection with Motion for Relief from the Automatic Stay			Malhorta 7
O	6/12/2019	Rebuttal Expert Report of Faten Sabry, Ph.D.			Sabry 2
P	5/30/2019	Expert Report of Faten Sabry, Ph.D.			Sabry 1
Q	6/16/2019	FOMB Press Release			
R	6/20/19	Excerpts from the Deposition of Faten Sabry, Ph.D.			
S		Chart Summarizing ERS Bond Debt Service			
T	6/2/2008	\$1,058,634,613.05 Employees Retirement System of the Government of the Commonwealth of Puerto Rico Senior Pension Funding Bonds, Series B			
U	6/30/2008	\$300,202,930 Employees Retirement System of the Government of the Commonwealth of Puerto Rico Senior Pension Funding Bonds, Series C			
V	5/31/2019	Plan Support Agreement			
W		Analysis Based on Malhorta0000179			
X		Present Value Calculations	Malhorta0000179		Malhorta 8