

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

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

ALONSO DEL VAL-ECHEVERRIA,
SOLELY IN HIS CAPACITY AS FOREIGN
REPRESENTATIVE OF PERFORADORA
ORO NEGRO, S. DE R.L DE C.V. AND
INTEGRADORA DE SERVICIOS
PETROLEOS ORO NEGRO, S.A.P.I. DE
C.V.,

Plaintiff,

-against-

AMA CAPITAL PARTNERS, LLC; ORO
NEGRO PRIMUS PTE. LTD.; ORO NEGRO
LAURUS PTE. LTD.; ORO NEGRO
FORTIUS PTE. LTD.; ORO NEGRO DECUS
PTE. LTD.; ORO NEGRO IMPETUS PTE.
LTD.; JOHN DOES 1-20

Defendants.

Adv. Pro. No. _____

**MOTION FOR AN EX PARTE TEMPORARY RESTRAINING ORDER AND ORDER
TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED**

The Foreign Representative,¹ by and through his undersigned counsel, hereby moves for an ex parte temporary restraining order and order to show cause why a preliminary injunction should not be issued to enjoin the (1) Oro Negro Primus Pte. Ltd.; (2) Oro Negro Laurus Pte. Ltd.; (3) Oro Negro Fortius Pte. Ltd.; (4) Oro Negro Decus Pte. Ltd.; (5) Oro Negro Impetus Pte. Ltd. (these entities together, the “Singapore Rig Owners”); (6) AMA Capital Partners, LLC (“AMA”); and (7) John Does 1-20 (collectively, the “Defendants”) from taking any action directly or indirectly to take over Oro Negro’s Jack-Up Rigs, including their ongoing attempts to board and abscond with the Jack-Up Rigs.

¹ Alonso Del Val-Echeverria (“Mr. Del Val”) is the Foreign Representative (the “Foreign Representative”) of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. (“Integradora Oro Negro”) and Perforadora Oro Negro, S. de R.L. de C.V. (“Perforadora Oro Negro”) and, together with Integradora Oro Negro, “Oro Negro” or the “Debtors”).

Dated: October 22, 2018
New York, New York

Respectfully submitted,

/s/ Gabriel F. Soledad

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