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

ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL CORP., and AMBAC ASSURANCE CORPORATION

**Plaintiffs** 

V.

ALEJANDRO GARCÍA PADILLA, JUAN C. ZARAGOZA GÓMEZ, INGRID RIVERA ROCAFORT, MELBA ACOSTA FEBO, LUIS F. CRUZ BATISTA, VÍCTOR A. SUÁREZ MELÉNDEZ, CÉSAR A. MIRANDA RODRÍGUEZ, JUAN FLORES GALARZA, and JOHN DOES 1-40

Defendants

Civil No. 16-1037 (JAF)

## MOTION TO JOIN "NOTICE OF AUTOMATIC STAY"

## TO THE HONORABLE COURT:

**COMES NOW** co-defendant, Alberto Bacó Bagué, in his official capacity as Interim President of the Government Development Bank for Puerto Rico ("Bacó Bagué")<sup>1</sup>, specially appearing and without submitting to the jurisdiction or venue of this Court, through the undersigned attorney, and respectfully states and prays:

1. On October 14, 2016, co-defendants Hon. Alejandro García Padilla, Hon. Juan C. Zaragoza Gómez, Hon. Luis Cruz Batista, Hon. Víctor Suárez Meléndez, Hon. César Miranda Rodríguez, Hon. Melba Acosta Febo, solely in her official capacity as member of the Working

The Complaint in this case names Ms. Melba Acosta Febo, in her official capacity as President of the GDB. However, Ms. Acosta Febo is no longer the President of the GDB. The position of Interim President of the GDB is now held by Mr. Bacó Bagué.

Group for the Fiscal and Economic Restoration of Puerto Rico, and Hon. Juan Flores Galarza, in their respective official capacities, filed a Notice of Automatic Stay. Docket No. 59.

2. The automatic stay applies to the claims asserted against Bacó Bagué, in his official capacity as Interim President of the GDB. Therefore, Bacó Bagué hereby joins, and incorporates by reference, the Notice of Automatic Stay in Docket No. 59.

**WHEREFORE**, Bacó Bagué respectfully requests that the Honorable Court take note that the instant action is automatically stayed as a matter of law by section 405 of PROMESA.

## RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That on this date a true and exact copy of the foregoing document has been filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for all parties.

In San Juan, Puerto Rico, this 17<sup>th</sup> day of October, 2016.

LAW OFFICES OF GISELLE LÓPEZ SOLER

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s/ Giselle López Soler Giselle López Soler USDC No. 224010