

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

LEX CLAIMS, LLC, *et al.*,

Plaintiffs,

v.

ALEJANDRO GARCÍA PADILLA, *et al.*,

Defendants.

Case No. 3:16-cv-02374 (FAB)

**RULE 7.1 DISCLOSURE STATEMENT OF THE  
BANK OF NEW YORK MELLON, AS INDENTURE TRUSTEE**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Local Rule 7.1 of the Local Rules of the United States District Court for the District of Puerto Rico, The Bank of New York Mellon, as indenture trustee, through its undersigned counsel, states that it is a wholly owned subsidiary of The Bank of New York Mellon Corp., a Delaware corporation, which is a publicly held company. No publicly held company owns 10% or more of the stock of The Bank of New York Mellon Corp.

Dated: November 23, 2016

Respectfully submitted,

SEPULVADO & MALDONADO, PSC

By: /s/ Albéniz Couret Fuentes  
Lee Sepulvado Ramos  
USDC-PR Bar No. 211912  
Albéniz Couret Fuentes  
USDC-PR Bar No. 222207  
252 Ponce de León Avenue  
Citibank Tower, Suite 1900  
San Juan, PR 00918  
Email: lsepulvado@smlawpr.com  
Email: acouret@smlawpr.com  
Telephone: 787-765-5656  
Facsimile: 787-294-0073

*Counsel for The Bank of New York Mellon,  
as indenture trustee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notification of such filing to all CM/ECF Participants.

Dated: November 23, 2016

*/s/ Albéniz Couret Fuentes* \_\_\_\_\_  
Albéniz Couret Fuentes  
USDC-PR Bar No. 222207  
acouret@smlawpr.com