

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

NATIONAL PUBLIC FINANCE GUARANTEE
CORPORATION,

Plaintiff,

-against-

ALEJANDRO GARCÍA PADILLA, JUAN C. ZARAGOZA
GÓMEZ, and LUIS F. CRUZ BATISTA,

Defendants.

CIVIL NO. 16-cv-2101 (FAB)

**PLAINTIFF'S RESPONSE TO FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD'S MOTION FOR LEAVE TO INTERVENE**

TO THE HONORABLE COURT:

COMES NOW Plaintiff National Public Finance Guarantee Corporation (“National”), by and through its undersigned counsel, and respectfully states and prays as follows:

National does not oppose the Financial Oversight and Management Board’s (the “Oversight Board”) motion for leave to intervene (Dkt. No. 89). National responds to the Oversight Board’s proposed opposition to the motion to lift the stay in the brief attached hereto as **Exhibit A**.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 28th day of October, 2016.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to all counsel of record.

**ADSUAR MUÑIZ GOYCO
SEDA & PÉREZ-OCHOA, P.S.C.**

By: /s/ Eric Pérez-Ochoa
Eric Pérez-Ochoa
USDC-PR No. 206314

/s/ Alexandra Casellas-Cabrera
Alexandra Casellas-Cabrera
USDC-PR No. 301010

208 Ponce de León Avenue, Suite 1600
San Juan, PR 00936
Telephone: 787.756.9000
Facsimile: 787.756.9010
Email: epo@amgprlaw.com
acasellas@amgprlaw.com

WEIL, GOTSHAL & MANGES LLP

By: /s/ Jonathan D. Polkes
Jonathan D. Polkes (*admitted pro hac vice*)
Edward Soto (*admitted pro hac vice*)
Salvatore A. Romanello (*admitted pro hac vice*)
Gregory Silbert (*admitted pro hac vice*)

767 Fifth Avenue
New York, N.Y. 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: jonathan.polkes@weil.com
edward.soto@weil.com
salvatore.romanello@weil.com
gregory.silbert@weil.com

Attorneys for Plaintiff