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Special Litigation Counsel to CFG Investment, S.A.C., Corporacion Pesquera Inca S.A.C. and Sustainable Fishing Resources S.A.C.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

CHINA FISHERY GROUP LIMITED (CAYMAN), <u>et al</u>.,

**Debtors.** 

Chapter 11

Case No. 16-11895 (JLG) (Jointly Administered)

## NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS AND REQUEST TO BE ADDED TO MASTER SERVICE LIST

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned

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cases as special litigation counsel to CFG Investment S.A.C., Corporacion Pesquera Inca S.A.C.

and Sustainable Fishing Resources S.A.C. Pursuant to Rules 2002 and 9010(b) of the Federal

Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, the undersigned

demand that all notices given or required to be given and all papers served in these cases be

delivered to and served upon the party identified below at the following address and further

requests to be added to the Master Service List:

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James S. Carr Jason R. Adams Kelley Drye & Warren LLP 101 Park Avenue New York, New York 10178 Tel: 212-808-7800 Fax: 212-808-7897 E-mail: <u>KDWBankruptcyDepartment@kelleydrye.com</u> <u>jcarr@kelleydrye.com</u> <u>jadams@kelleydrye.com</u>

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in these case.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive CFG Investment S.A.C.'s, Corporacion Pesquera Inca S.A.C.'s and Sustainable Fishing Resources S.A.C.'s (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which CFG Investment S.A.C., Corporacion Pesquera Inca S.A.C. and Sustainable Fishing Resources S.A.C. are or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York August 5, 2016

## KELLEY DRYE & WARREN LLP

By: <u>/s/ James S. Carr</u>

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