

Attorney or Party Name, Address, Telephone & FAX Nos.		FOR COURT USE ONLY	
Richard M. Pachulski (CA Bar No. 90073) Jeffrey W. Dulberg (CA Bar No. 181200) Malhar S. Pagay (CA Bar No. 189289) PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Blvd., 13th Floor Los Angeles, California 90067 Telephone: 310/277-6910 Facsimile: 310/201-0760 E-mail: rpachulski@pszjlaw.com jdulberg@pszjlaw.com mpagay@pszjlaw.com			
<input type="checkbox"/> <i>Movant(s) appearing without an attorney</i> <input checked="" type="checkbox"/> <i>Attorney for Movant(s)</i>			
<b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>			
In re:		2:19-bk-24804-VZ	
YUETING JIA, <sup>1</sup>		CASE NO.: <i>(formerly 19-12220 (KBO) in the District of Delaware)</i>	
		CHAPTER: 11	
		<b>DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)</b>	
Debtor(s).		[No Hearing Required]	

1. I am the ☐ Movant(s) or ☒ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (*date*): 1/10/20 Movant(s) filed a motion or application (Motion) entitled: Debtor's Motion for Order Extending the Period to Remove State Court Actions Pursuant to 28 U.S.C. §1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure [Docket No. 201]
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (*date*): 1/10/20 Movant(s), served a copy of ☐ the notice of motion or ☒ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 8972. The Debtor's mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

6. More than 17 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no objection and request for hearing was timely filed.<sup>2</sup>
8. No objection and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.
9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: 1/28/20

/s/ Jeffrey W. Dulberg  
Signature

Jeffrey W. Dulberg  
Printed name

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<sup>2</sup> A response to the Motion was filed by creditor Chongqing Strategic Emerging Industry LeEco Cloud Specialty Equity Investment Fund Partnership [Docket No. 256], however, respondent does not object to the granting of the Motion.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



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[Proposed] Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re:

YUETING JIA<sup>1</sup>,

Debtor.

Case No.: 2:19-bk-24804-VZ  
(formerly 19-12220 (KBO) in the  
District of Delaware)

Chapter 11

**DEBTOR'S MOTION FOR ORDER  
EXTENDING THE PERIOD TO REMOVE  
STATE COURT ACTIONS PURSUANT TO  
28 U.S.C §1452 AND RULE 9027 OF THE  
FEDERAL RULES OF BANKRUPTCY  
PROCEDURE; DECLARATION OF  
JIAWEI (JERRY) WANG IN SUPPORT  
THEREOF**

[No Hearing Required]

**TO THE HONORABLE VINCENT P. ZURZOLO, THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, THE OFFICE OF THE UNITED STATES TRUSTEE AND  
PARTIES REQUESTING SPECIAL NOTICE:**

Yueting Jia, debtor and debtor in possession herein ("YT" or "Debtor"), hereby moves (the  
"Motion") for entry of an order pursuant to 28 U.S.C. §1452 and F.R.B.P. Rules 9006(b) and 9027,  
extending the 90-day period set forth in Bankruptcy Rule 9027(a)(2)(A) during which the Debtor  
may seek to remove actions to federal court by an additional ninety-one (91) days, i.e., through and

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 8972. The Debtor's mailing address is  
91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

including April 13, 2020, without prejudice to the Debtor's right to seek further extensions. In support of the Motion, the Debtor respectfully states as follows:

**I.**

**JURISDICTION AND VENUE**

This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. §157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§1408 and 1409. The statutory and legal predicates for the relief sought herein are 28 U.S.C. 1452 and F.R.B.P. Rules 9006(b) and 9027.

**II.**

**BACKGROUND**

On October 14, 2019 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of title of the United States Code (the "Bankruptcy Code"). The Debtor continues in possession of his property.

The current time period within which the Debtor may file notices to remove actions under Bankruptcy Rule 9027(a)(2) expires on January 13, 2020.

**III.**

**RELIEF REQUESTED**

By this Motion, the Debtor seeks the entry of an order, pursuant to Rule 9006(b) of the Bankruptcy Rules, extending the time by which the Debtor may file notices of removal from January 13, 2020, through and including April 13, 2020, with respect to any proceedings that are eligible for removal under section 28 U.S.C. § 1452. The Debtor requests that the proposed April 13, 2020 deadline to file removal actions apply to all matters specified in Bankruptcy Rules 9027(a)(2) and (3).

**IV.**

**BASIS FOR REQUESTED RELIEF**

28 U.S.C. §1452 provides for the removal of pending civil claims pursuant to which the district courts have jurisdiction under 11 U.S.C. 1334. 28 U.S.C. §1452 provides in pertinent part as follows:

- (a) A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.
- (b) The court to which such claim or cause of action is removed may remand such claim or cause of action on any equitable ground. An order entered under this subsection remanding a claim or cause of action, or a decision to not remand, is not reviewable by appeal or otherwise....

28 U.S.C. 1452.

Bankruptcy Rule 9027 establishes the deadline for filing notices of removal of claims or causes of action. Bankruptcy Rule 9027(a)(2) provides in pertinent part as follows:

If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed [in the bankruptcy court] only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2). With respect to postpetition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Finally, Bankruptcy Rule 9006(b)(1) provides that the Court can extend unexpired time periods, including the removal period in Bankruptcy Rule 9027, without notice, upon a showing of cause:

[W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order....

Fed. R. Bankr. P. 9006(b)(1).

1 It is well settled that this Court is authorized to extend the removal periods provided under  
2 Bankruptcy Rule 9027. *See e.g., Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984)  
3 (stating that under Bankruptcy Rule 9006(b), “it is clear that the court may grant such an extension  
4 [of time to remove]”); *Caperton v. A.T. Massey Coal Co.*, 251 B.R. 322, 325 (S.D. W.Va. 2000)  
5 (explaining that Bankruptcy Rule 9006(b) allows a court to enlarge the time period for removing  
6 actions under Bankruptcy Rule 9027(a)(3)); *In re Lawrence*, 233 B.R. 248, 254-55 (N.D.N.Y. 1999)  
7 (stating that Bankruptcy Rule 9006 can be used to extend the time for removal of state court  
8 litigation to federal court); *Jandous Elec. Constr. Corp. v. City of New York (In re Jandous Elec.*  
9 *Constr. Corp.)*, 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (stating that the removal period may be  
10 extended under Bankruptcy Rule 9006); *Saint Joseph’s Hosp. v. Dep’t of Pub. Welfare of Pa. (In re*  
11 *Saint Joseph’s Hosp.)*, 103 B.R. 643, 648 (Bankr. E.D. Pa. 1989) (extending the 90-day time period  
12 in which to seek removal of pending state court litigation); *In re World Fin. Servs. Ctr. Inc.*, 81 B.R.  
13 33, 39 (Bankr. S.D. Cal. 1987) (stating that the court may enlarge the time period for filing removal  
14 notices under Bankruptcy Rule 9027(a)(3)).

15 The Debtor is a party to several civil lawsuits and proceedings (the “Actions”). Attached  
16 hereto as **Exhibit “A”** is a list of the Actions as reflected in the Debtor’s Statement of Financial  
17 Affairs. The Debtor is evaluating these Actions and, by this Motion, seeks to preserve his ability to  
18 remove any of these Actions. Initially, after the commencement of this chapter 11 case, the Debtor’s  
19 resources were focused on numerous pressing matters associated with (a) transitioning into  
20 bankruptcy, (b) administering his bankruptcy estate, and (c) and negotiating with the Committee and  
21 responding to contested matters. On December 19, 2019, this case was transferred to this Court  
22 from the District of Delaware.

23 The Debtor will continue to analyze any existing Actions and may become aware of  
24 additional Actions in connection with proofs of claim that are filed in this chapter 11 case. Given  
25 the press of the matters asserted with this case’s initiation, the Debtor needs additional time to  
26 determine whether he will seek to remove any Actions.

27 Accordingly, the Debtor seeks an extension of the current deadline under Bankruptcy Rule  
28 9027(a) to protect its right to remove those civil actions for which it may determine that removal is

appropriate. The extension sought will afford the Debtor additional time to determine whether to remove any pending civil action and will ensure that the Debtor does not forfeit valuable rights under 28 U.S.C. § 1452. Critically, the rights of other parties to the relevant litigation will not be prejudiced by the extension, because any party to an action that is removed may seek to have it remanded to the original court pursuant to 28 U.S.C. §1452(b).

The Debtor further requests that the order approving this Motion be without prejudice to (a) any position the Debtor may take regarding whether 11 U.S.C. § 362 of the Bankruptcy Code applies to stay any given civil action pending against the Debtor and (b) the right of the Debtor to seek further extensions of the period in which it may remove civil actions pursuant to Bankruptcy Rule 9027.

Accordingly, the Debtor submits that the relief requested herein is in the best interests of his estate and respectfully requests an extension of time by which the Debtor may file notices of removal through and including April 13, 2020 with respect to any proceedings that are eligible for removal under 28 U.S.C. §1452. The Debtor further reserves its right to seek additional extensions of this time period.

Dated: January 10, 2020

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Malhar S. Pagay

Richard M. Pachulski  
Jeffrey W. Dulberg  
Malhar S. Pagay

Proposed Attorneys for Debtor and Debtor  
in Possession



**DECLARATION OF JIAWEI (JERRY) WANG**

I, Jiawei (Jerry) Wang, declare and state as follows:

1. I am Vice President - Global Capital Markets at Faraday Future and in addition I am one of the Debtor's consultants with respect to his restructuring. I am readily familiar with the Debtor's financial affairs and matters concerning his chapter 11 case.

2. I make this declaration in support of the *Debtor's Motion for Order Extending the Period to Remove State Court Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* (the "Motion"). All capitalized terms not otherwise defined herein shall have the same meaning as set forth in the Motion.

3. The current deadline for the Debtor to remove actions to federal court expires on January 13, 2020 (the "Removal Deadline").

4. The Debtor is a party to several civil lawsuits and proceedings (the "Actions"). Attached hereto as **Exhibit "A"** is a list of the Actions as reflected in the Debtor's Statement of Financial Affairs. The Debtor is evaluating these Actions and, by this Motion, seeks to preserve his ability to remove any of these Actions.

5. Initially, after the commencement of this chapter 11 case, the Debtor's resources were focused on numerous pressing matters associated with (a) transitioning into bankruptcy, (b) administering his bankruptcy estate, and (c) and negotiating with the Committee and responding to contested matters.

6. Accordingly, the Debtor seeks to extend the Removal Deadline by an additional ninety-one (91) days, i.e., to April 13, 2020 to determine whether he will seek to remove any actions, and reserves his right to seek additional extensions of this time period.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10 day of January 2020, at Gardena, California.

  
\_\_\_\_\_  
Jiawei (Jerry) Wang



# EXHIBIT A

Yeuting, Jia  
SOFA Attachment 9  
Litigation

Case Title: Han's San Jose Hospitality LLC v. Jia Yueting, et al.,  
Case Number: Case No. 19 CV342187 (Consolidated with Han's San Jose Hospitality LLC v. Le Holdings (Beijing) Co., LTD, et al. Case No. 17CV317221).  
Nature of the case: Unlawful detainer/ alter ego.  
Court or agency: Santa Clara Superior Court, 191 North 1st Street, San Jose, California, 95113  
Status of the case: Pending

Case Title: Shanghai Lan Cai Asset Management Co., Ltd. v. Jia Yueting  
Case Number: No. 2: 18-cv-10255-SJO (MRWx)  
Nature of Case: Petition to confirm and enforce a foreign judgment  
Court or Agency: U.S. District Court for the Central District of California  
Address: 350 W. 1st Street, Los Angeles, California 90012  
Status of Case: Judgment entered. Appeal and enforcement proceedings pending.

Case Title: Shanghai Lan Cai Asset Management Co., Ltd. v. Jia Yueting  
Case Number: 19-55509  
Nature of Case: Appeal from final judgment granting petition to confirm and enforce a foreign judgment  
Court or Agency: U.S. Court of Appeals for the Ninth Circuit  
Address: P.O. Box 193939, San Francisco, California 94119  
Status of Case: Pending.

Case Title: Shanghai Qichengyueming Investment Partnership Enterprise (Limited Partnership) v. Jia Yueting  
Case Number: No. 2: 18-cv-07723-SJO (JPRx)  
Nature of Case: Petition to confirm and enforce a foreign judgment  
Court or Agency U.S. District Court for the Central District of California  
Address: 350 W. 1st Street, Los Angeles, California 90012  
Status of Case: Judgment entered. Enforcement proceedings pending.

Case Title: Jinan Rui Si Le Enterprise Management Consulting Partnership v. Yueting Jia  
Case Number: No. 18STCP02594  
Nature of Case: Complaint for enforcement of a foreign judgment  
Court or Agency: Superior Court of the State of California, County of Los Angeles  
Address: 111 North Hill Street, Los Angeles, California 90012  
Status of Case: Pending.

Case Title: Shanghai Lan Cai Asset Management Co, Ltd v Jia Yueting, FF Peak Holding Limited and FF Top Holding Ltd.  
Case Number: BVIHC (COM) 198/2018  
Nature of Case: Enforcement of arbitration award issued by the Beijing Arbitration Commission with freezing orders against the entire issued share capital of FF Peak Holding Limited and FF Top Holding Ltd  
Court or Agency: Eastern Caribbean Supreme Court  
Address: Registry of the High Court, 2nd Floor, SAKAL Building, Wickham's Cay, Road Town Tortola VG1110  
Status of Case: Pending

Case Title: O-Film Global (HK) Trading Ltd. and Nanchang O-Film Photoelectric Technology Co., Ltd. v. Yue-Ting Jia

Case Number: YC072617

Court or Agency: Superior Court of the State of California, County of Los Angeles, Torrance  
Courthouse 825 Maple Ave., Torrance, CA 90503

Nature of the case: Breach of Contract

Status of Case: Pending

Case Title: Oriental Securities Co., Ltd. Vs Yueting Jia

Case Number: 2017 Jing 03 Zhi #644, 2018 Jing 03 Zhihui #82

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature of the case: Contract Disputes

Status: Concluded

Case Title: Ping An Securities Co., Ltd. Vs Yueting Jia

Case Number: 2017 Jing 03 Zhi #753

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: Huafu Securities Co., Ltd. Vs Yueting Jia

Case Number: 2017 Jing 03 Zhi #755

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: Huafu Securities Co., Ltd. Vs Yueting Jia

Case Number: 2017 Jing 01 Zhi #636

Court Name: Beijing First Intermediate People's Court

Court Address: No. 16 Shijingshan Road, Shijingshan District, Beijing 100040

Nature: Contract Disputes

Status: Concluded

Case Title: Guotai Junan Securities Co., Ltd. Vs Yueting Jia

Case Number: 2018 Jing 03 Zhi #60

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: China Minsheng Trust Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2017 Jing 03 Zhi #607, 2018 Jing 03 Zhihui #72

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: China Minsheng Trust Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2017 Jing 03 Zhi #608, 2018 Jing 03 Zhihui #73

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Contract Disputes  
Status: Concluded

Case Title: China Minsheng Trust Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Leshi Zhixin Electronic Technology (Tianjin) Co., Ltd.  
Case Number: 2017 Jing 03 Zhi #788  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Contract Disputes  
Status: Concluded

Case Title: Zhejiang Zhongtai Chuangzhan Enterprise Management Co., Ltd. Vs Yueting Jia & Beijing Dongfang Cheyun Information Technology Co., Ltd. & Leshi Holdings (Beijing) Co., Ltd. & Wei Gan & Beijing Hongcheng Xintai Real Estate Co., Ltd. & Meng Wu  
Case Number: 2017 Jing 03 Zhi #646  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Contract Disputes  
Status: Concluded

Case Title: Nanjing Dejin Investment Management Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & LeTV Mobile Intelligent Information Technology (Beijing) Co., Ltd.  
Case Number: 2018 Su 01 Zhi #1367  
Court Name: Nanjing Intermediate People's Court of Jiangsu Province  
Court Address: No. 35, Guangzhou Road, Gulou District, Nanjing, Jiangsu, China 210000  
Nature: Loan Contract, Guarantee Contract Dispute  
Status: Concluded

Case Title: Beijing Haidian Technology Financial Capital Holding Group Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Hong Liu & Shi Peng  
Case Number: 2017 Jing 03 Zhi #10  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Contract Disputes  
Status: Concluded

Case Title: Shanghai Qicheng Yueming Investment Partnership (Limited Partnership) vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd  
Case Number: 2018 Jing 03 Zhi #672  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Convertible bond purchase agreement dispute  
Status: Concluded

Case Title: Shanghai Lan Cai Asset Management Co., Ltd. Vs Yueting Jia & Leshi Sports Culture Industry Development (Beijing) Co., Ltd.  
Case Number: 2019 Jing 03 Zhi #30  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes  
Status: Concluded

Case Title: Shanghai Leyi Venture Capital Management Center (Limited Partnership) vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & LeTV Mobile Intelligent Information Technology (Beijing) Co., Ltd.

Case Number: 2018 Hu 01 Zhi #1626

Court Name: Beijing First Intermediate People's Court

Court Address: No. 16 Shijingshan Road, Shijingshan District, Beijing 200336

Nature: Private lending dispute

Status: Concluded

Case Title: Western Securities Co., Ltd vs Yueting Jia & Wei Gan

Case Number: 2019 Shan 71 Zhi #4

Court Name: Shaanxi Highe People's Court

Court Address: No. 80, Yanta 5th Road, Xi'an, Shaanxi, China 710061

Nature: Contract Disputes

Status: Concluded

Case Title: Wuhan Credit Small Loan Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Wei Gan & Yuemin Jia

Case Number: 2019 E 01 Zhi #291

Court Name: Wuhan Intermediate People's Court of Hubei Province

Court Address: No.156, Changqing Road, Jiangnan District, Wuhan, Hubei, China 430024

Nature: Loan contract dispute

Status: Concluded

Case Title: Wuhan Credit Small Loan Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Wei Gan & Yuemin Jia

Case Number: 2019 E 01 Zhi #289

Court Name: Wuhan Intermediate People's Court of Hubei Province

Court Address: No.156, Changqing Road, Jiangnan District, Wuhan, Hubei, China 430024

Nature: Loan contract dispute

Status: Concluded

Case Title: Wuhan Credit Small Loan Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Wei Gan & Yuemin Jia

Case Number: 2019 E 01 Zhi #290

Court Name: Wuhan Intermediate People's Court of Hubei Province

Court Address: No.156, Changqing Road, Jiangnan District, Wuhan, Hubei, China 430024

Nature: Loan contract dispute

Status: Concluded

Case Title: Wuhan Credit Small Loan Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Wei Gan & Yuemin Jia

Case Number: 2019 E 01 Zhi #292

Court Name: Wuhan Intermediate People's Court of Hubei Province

Court Address: No.156, Changqing Road, Jiangnan District, Wuhan, Hubei, China 430024

Nature: Loan contract dispute

Status: Concluded

Case Title: Changjiang Securities (Shanghai) Asset Management Co., Ltd. Vs Yueting Jia & Wei Gan

Case Number: 2019 E 96 Zhi #52

Court Name: Hubei High People's Court

Court Address: No. 9 Gongyi Road, Wuchang District, Wuhan, Hubei, China 433000

Nature: Securities repurchase contract dispute

Status: Concluded

Case Title: Changjiang Securities (Shanghai) Asset Management Co., Ltd. Vs Yueting Jia & Wei Gan

Case Number: 2019 E 96 Zhi #53

Court Name: Hubei High People's Court

Court Address: No. 9 Gongyi Road, Wuchang District, Wuhan, Hubei, China 433000

Nature: Securities repurchase contract dispute

Status: Concluded

Case Title: Changjiang Securities (Shanghai) Asset Management Co., Ltd. Vs Yueting Jia & Wei Gan

Case Number: 2019 E 96 Zhi #51

Court Name: Hubei High People's Court

Court Address: No. 9 Gongyi Road, Wuchang District, Wuhan, Hubei, China 433000

Nature: Securities repurchase contract dispute

Status: Concluded

Case Title: Tianjin Nuode Investment Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2019 Jing 03 Zhi #301

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: Jinan Ruisile Enterprise Management Consulting Partnership (Limited Partnership) vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & LeTV Mobile Intelligent Information Technology (Beijing) Co., Ltd.

Case Number: 2019 Lu 01 Zhi Hui #92

Court Name: Intermediate People's Court of Jinan City, Shandong Province

Court Address: No.1, Jinger Road, Shizhong District, Jinan City, Shandong Province, China 250001

Nature: Loan contract dispute

Status: Concluded

Case Title: Yuanxin Xu vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2019 Jing 03 Zhi #518

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Loan contract dispute

Status: Concluded

Case Title: Shenzhen Winzhongtong Non-Financing Guarantee Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. &



Beijing Hongcheng Xintai Real Estate Co., Ltd.

Case Number: 2019 Jing 03 Zhi #531

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: China Merchants Bank Co., Ltd. Shanghai Chuanbei Branch vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & LeTV Mobile Intelligent Information Technology (Beijing) Co., Ltd. & Lefeng Mobile Hong Kong Limited & Wei Gan

Case Number: 2019 Hu Zhi #44

Court Name: Shanghai Higher People's Court

Court Address: No. 308, Zhaojiabang Road, Shanghai, China 200031

Nature: Financial loan contract dispute

Status: Concluded

Case Title: Huarong Securities Co., Ltd. Vs Yueting Jia

Case Number: 2019 Jing 03 Zhi #446

Court Name: Zhejiang High People's Court

Court Address: No. 5, Majing Road, Hangzhou, Zhejiang, China 310012

Nature: Pledged repurchase contract dispute

Status: Concluded

Case Title: Ping An Securities Co., Ltd. Vs Yueting Jia

Case Number: 2019 Jing 03 Zhi #631

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: LeTV Film (Beijing) Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2019 Jing 03 Zhi #501

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Pledge contract dispute

Status: Concluded

Case Title: Chongqing Strategic Emerging Industry Leshiyun Special Equity Investment Fund Partnership (Limited Partnership) vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.

Case Number: 2018 Jing 03 Zhi Bao #315, 2018 Jing 03 Cai Bao #235

Court Name: Beijing Third Intermediate People's Court

Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012

Nature: Contract Disputes

Status: Concluded

Case Title: Beijing Siwei Equity Investment Management Center (Limited Partnership) vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & Lean Yingyun (Tianjin) Cultural Communication Partnership (Limited Partnership) & Le Zhengrong (Tianjin) Cultural Communication Partnership (Limited Partnership) &

Lepu Shadow (Tianjin) Cultural Communication Partnership (Limited Partnership)

Case Number: 2018 Jing 03 Cai Bao #135

Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: Contract Disputes  
Status: Concluded

Case Title: Xinyu Dingfeng Yingtong Investment Management Center (Limited Partnership) vs  
Yueting Jia & Leshi Holdings (Beijing) Co., Ltd.  
Case Number: 2017 Jing 0105 Minchu #53620  
Court Name: Beijing Chaoyang District People's Court  
Court Address: No. 2, Chaoyang Park South Road, Chaoyang District, Beijing 100026  
Nature: Equity transfer dispute  
Status: Concluded

Case Title: Shenzhen Chengcheng  
Commercial Factoring Co., Ltd. Vs Yueting Jia & Leshi Holdings (Beijing) Co., Ltd. & LeTV  
Mobile Intelligent Information Technology (Beijing) Co., Ltd.  
Case Number: 2017 Jing 03 Zhibao #89  
Court Name: Beijing Third Intermediate People's Court  
Court Address: No. 81, Laiguangying West Road, Chaoyang District, Beijing, China 100012  
Nature: No cause management, unjust enrichment dispute  
Status: Concluded

Case Title: China CITIC Bank Co., Ltd. Head Office Sales Department vs Yueting Jia & Leshi  
Holdings (Beijing) Co., Ltd. & Beijing Fortune Times Real Estate Co., Ltd. & Beijing Baiding New  
Century Business Management Co., Ltd. & LeTV Information Technology (Beijing) Co., Ltd.  
Case Number: 2017 Jin Min Chu #86  
Court Name: Beijing High People's Court  
Court Address: No. 10, Jianguomen South Street, Chaoyang District, Beijing 100022  
Nature: Financial loan contract dispute  
Status: On appeal

Case Title: Ping An Bank Co., Ltd. Beijing Branch vs Yueting Jia & Yuemin Jia  
Case Number: 2017 Jing Min Chu #63  
Court Name: Beijing High People's Court  
Court Address: No. 10, Jianguomen South Street, Chaoyang District, Beijing, China 100022  
Nature: Guarantee contract dispute  
Status: Concluded

Case Title: Ping An Bank Co., Ltd. Shenzhen Branch vs Yueting Jia & Leshi Holdings (Beijing)  
Co., Ltd. & Leshi Sports Culture Industry Development (Beijing) Co., Ltd.  
Case Number: 2018 Yue Min Chu #125  
Court Name: Guangdong High People's Court  
Court Address: No. 9, Yiheng Road, Yuancun, Tianhe District, Guangzhou, China 510655  
Nature: Financial loan contract dispute  
Status: Pending

Case Title: Zheshang Bank Co., Ltd. Beijing Branch vs Yueting Jia & Leshi Holdings (Beijing)  
Co., Ltd & Leshi Sports Culture Industry Development (Beijing) Co., Ltd. & Xiamen Octopus  
Interactive Network Technology Co., Ltd.  
Case Number: 2018 Jing 04 Min Chu #316  
Court Name: Beijing No. 4 Intermediate People's Court

Court Address: No. 3 Sanjingdi, Fengtai District, Beijing, China 100040  
Nature: Financial loan contract dispute  
Status: Concluded

Case Title: BOE Technology (Hong Kong) Co., Ltd. Vs Yueting Jia & LeTV Mobile Intelligent Information Technology (Beijing) Co., Ltd. & LeSai Mobile Technology (Beijing) Co., Ltd. & Leshi Holdings (Beijing) Co., Ltd.  
Case Number: 2017 Jing Min Chu #54  
Court Name: Beijing High People's Court  
Court Address: No. 10, Jianguomen South Street, Chaoyang District, Beijing, China 100022  
Nature: Sale contract dispute  
Status: Pending

Case Title: Yizhuang International Holdings (Hong Kong) Co., Ltd. Vs Yueting jia & Leshi Holdings (Beijing) Co., Ltd.  
Case Number: 2018 Jing Min Chu #72  
Court Name: Beijing High People's Court  
Court Address: No. 10, Jianguomen South Street, Chaoyang District, Beijing, China 100022  
Nature: Guarantee contract dispute  
Status: Pending

Case Title: Beijing Century Ruike System Technology Co., Ltd. Vs Yueting Jia & Leshi Sports Culture Industry Development (Beijing) Co., Ltd. & Leshi Holdings (Beijing) Co., Ltd.  
Case Number: 2018 Jing 0108 Min Chu #51312  
Court Name: Beijing Haidian District People's Court  
Court Address: 12 Danling Street, Haidian District, Beijing, China 100080  
Nature: Sale contract dispute  
Status: Pending

Case Title: Jiangsu Red Earth Venture Capital Management Co., Ltd. Vs Yueting Jia  
Case Number: Unknown  
Court Name: Ningbo Intermediate People's Court, Zhejiang Province  
Court Address: No. 746 Zhongxing Road, Jiangdong District, Ningbo, Zhejiang, China 315040  
Nature: Contract Disputes  
Status: Pending

Case Title: Yueting Jia v. Yingqiong Gu  
Case Number: No.17-2-27517-4KNT  
Nature of Case: YT brought a claim against Mr. Gu for defamation.  
Court Name: Superior court of Washington for king country  
Address: 516 3rd Ave, Seattle, WA 98104  
Status of Case: The case has been settled in 10/24/2018.

Case Title: Shenzhen Leshi Xingen Second Investment Management Enterprise (LLP) etc. v. Yueting Jia etc.  
Case Number: No.HKIAC/A18039.  
Nature of Case: The plaintiffs have withdrawn their claims against all defendants.  
Court Name: Hong Kong International Arbitration Centre  
Address: 38th Floor Two Exchange Square, 8 Connaught Place, Central, Hong Kong  
Status of Case: Concluded

Case Title: Dispute relating to: (1) the Amended and Restated Shareholders Agreement dated 30 November 2017; and (2) the Amendment and Consent dated 18 July 2018

Case Number: HKIAC/A18176

Nature of the case: Dispute between Evergrande, Faraday Future and YT

Court Name: Hong Kong International Arbitration Center

Address: 38/F Two Exchange Square B Connaught Place Hong Kong

Status of Case: Concluded

Case Title: VIZIO, Inc. and LeEco V. LTD., LeEco Global Group, Ltd., Lele Holding, LTD., Yueting Jia

Case Number: 8:17-cv-01175-DOC-JDE

Nature of Case: Breach of Contract

Court Name: UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

Address: Ronald Reagan Federal Building, United States Courthouse, 411 West Fourth Street, Courtroom 9D, Santa Ana, CA, 92701-4516

Status of Case: Concluded

Case Title: Gan Wei v. Yueting Jia

Nature of Case: Divorce Proceeding

Court Name: Chengdu Jinjiang District People's Court

Address: No. 90, Longzhou Road, Gongnongyuan Street, Jinjian District, Chengdu, Sichuan, China

Date: 11 October 2019 (Beijing time)

Status of Case: Pending

Case Title: Director of Taxation Department of Revenue v. Jia Yueting

Nature of Case: Wage Garnishment

Case Number: 2018-ST-010829

Court Name: Third Judicial District Court

Address: 200 SE 7<sup>th</sup> St., Topeka, Kansas 66003

Status of Case: Pending

Case Title: Director of Taxation Department of Revenue v. Jia Yueting

Nature of Case: Tax Warrant

Case Number: 2018-ST-010835

Court Name: Third Judicial District Court

Address: 200 SE 7<sup>th</sup> St., Topeka, Kansas 66003

Status of Case: Unknown

Richard M. Pachulski (CA Bar No. 90073)  
Jeffrey W. Dulberg (CA Bar No. 181200)  
Malhar S. Pagay (CA Bar No. 189289)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, California 90067  
Telephone: 310/277-6910  
Facsimile: 310/201-0760  
E-mail: rpachulski@pszjlaw.com  
jdulberg@pszjlaw.com  
mpagay@pszjlaw.com

[Proposed] Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re:

YUETING JIA<sup>1</sup>,

Debtor.

Case No.: 2:19-bk-24804-VZ  
(formerly 19-12220 (KBO) in the  
District of Delaware)

Chapter 11

**NOTICE OF FILING OF DEBTOR'S  
MOTION FOR ORDER EXTENDING  
PERIOD TO REMOVE STATE COURT  
ACTIONS PURSUANT TO 28 U.S.C  
§1452 AND RULE 9027 OF THE  
FEDERAL RULES OF BANKRUPTCY  
PROCEDURE**

[No Hearing Required]

**TO THE HONORABLE VINCENT P. ZURZOLO, THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, THE OFFICE OF THE UNITED STATES TRUSTEE AND  
PARTIES REQUESTING SPECIAL NOTICE:**

**PLEASE TAKE NOTICE** that Yueting Jia, debtor and debtor in possession herein ("YT" or  
"Debtor"), has filed a motion with this Court (the "Motion") for entry of an order pursuant to 28  
U.S.C. §1452 and F.R.B.P. Rules 9006(b) and 9027, extending the 90-day period set forth in

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 8972. The Debtor's mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

1 Bankruptcy Rule 9027(a)(2)(A) during which the Debtor may seek to remove actions to federal court  
2 by an additional ninety-one (91) days, i.e., through and including April 13, 2020, without prejudice  
3 to the Debtor's right to seek further extensions.

4 **PLEASE TAKE FURTHER NOTICE** that, pursuant Local Rule 9013-1(o)(1), any  
5 objection to the proposed Motion and request for hearing must be filed with the Court and served on  
6 the Committee, its proposed counsel, and the Office of the United States Trustee no later than  
7 fourteen (14) days from the date of service of this notice. A true and correct copy of the Motion can  
8 be obtained by contacting Beth Dassa, Paralegal, at Pachulski Stang Ziehl & Jones LLP, 10100  
9 Santa Monica Blvd, 13<sup>th</sup> Floor, Los Angeles, California 90067, telephone: (310) 277-6910; email:  
10 bdassa@pszjlaw.com.

11 Dated: January 10, 2020

PACHULSKI STANG ZIEHL & JONES LLP

12  
13 By /s/ Malhar S. Pagay

14 Richard M. Pachulski  
15 Jeffrey W. Dulberg  
16 Malhar S. Pagay

17 Proposed Attorneys for Debtor and Debtor  
18 in Possession  
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EPIQ CORPORATE RESTRUCTURING, LLC  
777 Third Avenue, 12th Floor  
New York NY, 10017  
Phone: (646) 282-2500  
Fax: (646) 282-2501  
Email: [ProjectR@epiqglobal.com](mailto:ProjectR@epiqglobal.com)  
Debtor's Noticing and Claims Agent

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

IN RE

YUETING JIA

DEBTOR,

) CASE NO.: 2:19-BK-24804-VZ  
) (FORMERLY 19-12220 (KBO) IN THE  
) DISTRICT OF DELAWARE)  
)  
) Chapter 11  
)  
) PROOF OF SERVICE OF:  
) (1) DEBTOR'S MOTION FOR ORDER  
) EXTENDING THE PERIOD TO  
) REMOVE STATE COURT ACTIONS  
) PURSUANT TO 28 U.S.C. §1452 AND  
) RULE 9027 OF THE FEDERAL  
) RULES OF BANKRUPTCY  
) PROCEDURE; DECLARATION OF  
) JIAWEI (JERRY) WANG IN  
) SUPPORT THEREOF [DOCKET NO.  
) 201]  
) (2) NOTICE OF FILING OF  
) DEBTOR'S MOTION FOR AN  
) ORDER EXTENDING PERIOD TO  
) REMOVE STATE COURT ACTIONS  
) PURSUANT TO 28 U.S.C §1452 AND  
) RULE 9027 OF THE FEDERAL  
) RULES OF BANKRUPTCY  
) PROCEDURE [DOCKET NO. 202]  
)  
) JUDGE: HON. VINCENT P. ZURZOLO  
)

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

777 Third Avenue, 12<sup>th</sup> Floor, New York, NY 10017

True and correct copies of the foregoing documents entitled (*specify*):

**See Attached Affidavit of Service**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

(NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 10, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Tanya Behnam [tbehnam@polsinelli.com](mailto:tbehnam@polsinelli.com), [tanyabehnam@gmail.com](mailto:tanyabehnam@gmail.com)

Kelly L Morrison [kelly.l.morrison@usdoj.gov](mailto:kelly.l.morrison@usdoj.gov)

Randy B Soref [rsoref@polsinelli.com](mailto:rsoref@polsinelli.com), [ccripe@polsinelli.com](mailto:ccripe@polsinelli.com); [ladocketing@polsinelli.com](mailto:ladocketing@polsinelli.com)

United States Trustee (LA) [ustpregion16.la.ecf@usdoj.gov](mailto:ustpregion16.la.ecf@usdoj.gov)

☒ Service information

continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On **January 10, 2020**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**See attached Affidavit of Service**

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**

**TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) January 20, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

01/13/2020  
*Date*

Cassandra Murray  
*Printed Name*

/s/Cassandra Murray  
*Signature*

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**F 9013-3.1.PROOF.SERVICE**

# EXHIBIT A

Claim Name	Address Information
AUSTRIA LEGAL, LLC	COUNEL TO (THE CLIENTS) ATTN: MATTHEW P. AUSTRIA 1007 N. ORANGE STREET, 4TH FLOOR WILMINGTON DE 19801
BALLON STOLL BADER & NADLER PC	COUNSEL TO (CLIENTS) ATTN: VINCENT J. ROLDAN 729 SEVENTH AVENUE -17TH FLOOR NEW YORK NY 10019
DELAWARE SECRETARY OF STATE	DIVISION OF CORPORATIONS, TAX DIVISION 401 FEDERAL STREET P.O. BOX 898 DOVER DE 19903
DELAWARE SECRETARY OF THE TREASURY	ATTN: OFFICE, MANAGING AGENT OF GENERAL AGENT 820 SILVERLAKE BLVD, SUITE 100 DOVER DE 19904
DENTONS US LLP	COUNSEL TO SHANGHAI QICHENGYUEMING ATTN: JOHN A. MOE, II, ESQ, JINSHU "JOHN"ZHANG, ESQ 601 S. FIGUEROA STREET, SUITE 2500 LOS ANGELES CA 90017-5704
DORSEY & WHITNEY (DELAWARE) LLP	COUNSEL TO CHONQING ATTN: ERIC LOPEZ SCHNABEL ALESSANDRA GLORIOSO 300 DELAWARE AVENUE SUITE 1010 WILMINGTON DE 19801
DORSEY & WHITNEY LLP	COUNSEL TO CHONQING ATTN: RAY LIU TWIN TOWERS (WEST), SUITE 1503-1505 B12 JIANGUOMENWAI AVENUE CHAOYANG DISTRICT, BEIJING 100022 CHINA
DORSEY & WHITNEY LLP	COUNSEL TO CHONQING ATTN: ERIC LOPEZ SCHNABEL 51 WEST 52 STREET NEW YORK NY 10019
GRANDALL & PARTNERS CONSULTING LLC	COUNSEL TO (THE CLIENTS) ATTN: WENJIE SUN 729 SEVENTH AVENUE - 17TH FLOOR NEW YORK NY 10019
INTERNAL REVENUE SERVICE	CENTRALIZED INSOLVENCEY OPERATION PO BOX 7346 PHILADELPHIA PA 19101-7346
LAW OFFICES OF DAVID W. MEADOWS	DAVID W. MEADOWS 1801 CENTURY PARK EAST, SUITE 1235 LOS ANGELES CA 90067
LOWENTEN Sandler LLP	COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS ATTN: JEFFREY D. PROL, ESQ., ANDREW D. BEHLMANN, ESQ., JEREMY D. MERKIN, ESQ. ONE LOWENSTEIN DRIVE ROSELAND NJ 07068
MORRIS JAMES LLP	COUNSEL TO WEIDONG ZHU ATTN: BRYA M.KEILSON ESQ. 500 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
MORRIS JAMES LLP	COUNSEL TO CHINA CONSUMER CAPTAL FUND II ATTN: BRYA M. KEILSON, ESQ. 500 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
MORRIS JAMES LLP	COUNSEL TO NINGBO HANGZHOU BAY NEW AREA LERAN INVESTMENT MANAGEMENT PARTNERSHIP ATTN: BRYA M. KEILSON, ESQ. 500 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
MORRIS JAMES LLP	COUNSEL TO CAHIN SOFT GROWING INVESTMENT (WUXI) PARTNERSHIP ATTN: BRYA K.KEILSON, ESQ 500 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
MORRIS JAMES LLP	COUNSEL TO LINFEN INVESTMENT GROUP, LTD ATTN: BRYA KEILSON, ESQ.` 500 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
OFFICE OF THE UNITED STATES TRUSTEE	ATTN: KELLY L. MORRISON 915 WILSHIRE BLVD., STE 1850 LOS ANGELES CA 90017
PACHULSKI STANG ZIEHL & JONES LLP	ATTN: JEFF W. DULBERG 10100 SANTA MONICA BLFD, 13TH FLR LOS ANGELES CA 90067
PACHULSKI STANG ZIEHL & JONES LLP	ATTN: MAHAR S. PAGAY 10100 SANTA MONICA BLVD. 13TH FLOOR LOS ANGELES CA 90067
POLSINELLI LLP	ATTN: TANYA BEHNAM 2049 CENTURY PARK EAST, SUITE 2900 LOS ANGELES CA 90067
POLSINELLI LLP	ATTN: RANDYE B. SOREF 2049 CENTURY PARK EAST, SUITE 2900 LOS ANGELES CA 90067
POTTER ANDERSON & CORROON LLP	COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS ATTN: CHRISTOPHER M. SAMISL L KATHERINE GOOD, AARON H. STULMAN 1313 N. MARKET STREET, 6TH FLOOR WILMWILMINGTON DE 19801-3700
SECURITIES AND EXCHANGE COMMISSION	NEW YORK REGIONAL OFFICE ANDREW CALAMARI, REGIONAL DIRECTOR 200 VESEY STREET, SUITE 400 NEW YORK NY 10281-1022
SECURITIES AND EXCHANGE COMMISSION	ATTN: BANKRUPTCY COUNSEL 444 SOUTH FLOWER STREET, SUITE 900 LOS ANGELES CA 90071-9591
SECURITIES AND EXCHANGE COMMISSION	100 F STREET, NE WASHINGTON DC 20549
SEITZ, VAN CGTROP & GREEN , P.A.	COUNSEL TO HANS SAN JOSE ATTN: JARED T. GREEN 222 DELAWARE AVENUE, SUITE 1500 WILMINGTON DE 19801
THE ROSNERS LAW GROUP	COUNSEL TO SHANGHAI QICHENGYUEMING INVESTMENT ATTN: FREDERICK B. ROSNER, ESQ.; ZHAO (RUBY) LIU, ESQ. 824 MARKET STREET, SUITE 810 WILMINGTON DE 19801
U.S. ATTORNEY GENERAL	ATTN DAVID C WEISS HERCULES BUILDING 1313 N. MARKET STREET WILMINGTON DE 19801
UNITED STATES BANKRUPTCY COURT	ATTN: VINCENT ZURZOLO 255 EAST TEMPLE ST, SUITE 1360 LOS ANGELES CA 90012

## EXHIBIT B



**MSL-EMAIL**

abehlmann@lowenstein.com  
astulman@potteranderson.com  
benjamin.rhode@kirkland.com  
bkeilson@morrisjames.com  
david@davidwmeadowslaw.com  
kelly.l. Morrison@usdoj.gov  
kgood@potteranderson.com  
csamis@potteranderson.com  
DAVID.L.BUCHBINDER@USDOJ.GOV  
dpacitti@klehr.com  
DOSDOC\_WEB@STATE.DE.US  
glorioso.alessandra@dorsey.com  
jdulberg@pszjlaw.com  
jmerkin@lowenstein.com  
john.moe@dentons.com;  
john.zhang@dentons.com  
jprol@lowenstein.com;;  
jtgreen@svglaw.com  
liu.ray@dorsey.com  
liu@teamrosner.com  
maustria@austriallc.com  
mbranzburg@klehr.com  
mpagay@pszjlaw.com  
rsoref@polsinelli.com  
schnabel.eric@dorsey.com  
STATETREASURER@STATE.DE.US  
sunwenjie@grandall.com.cn  
sveghte@klehr.com  
tbehnam@polsinelli.com  
voldan@ballonstoll.com  
yfrench@kirkland.com

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10100 Santa Monica Boulevard, Suite 1300, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION [LBR 9013-1(o)(3)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 1/28/20, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 1/28/20, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY**

United States Bankruptcy Court  
Central District of California  
Attn: Hon. Vincent Zurzolo  
Edward R. Roybal Federal Bldg./Courthouse  
255 East Temple Street, Suite 1360  
Los Angeles, CA 90012

**VIA EMAIL**

Alexandra Krasovec krasovec.alexandra@dorsey.com  
Eric Lopez Schnabel Schnabel.eric@dorsey.com  
Alessandra Glorioso glorioso.alessandra@dorsey.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>1/28/20</u>	<u>Nancy H. Brown</u>	<u>/s/ Nancy H. Brown</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**SERVICE INFORMATION FOR CASE NO. 2:19-bk-24804-VZ**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**

- Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com
- Jeffrey W Dulberg jdulberg@pszjlaw.com
- Alexandra N Krasovec krasovec.alexandra@dorsey.com, claridge.vanessa@dorsey.com
- David W. Meadows david@davidwmeadowslaw.com
- Kelly L Morrison kelly.l.morrison@usdoj.gov
- Malhar S Pagay mpagay@pszjlaw.com, bdassa@pszjlaw.com
- Christopher E Prince cprince@lesnickprince.com, jmack@lesnickprince.com; cprince@ecf.courtdrive.com
- Randy B Soref rsoref@polsinelli.com, ccripe@polsinelli.com; ladocketing@polsinelli.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Emily Young pacerteam@gardencitygroup.com, rjacobs@ecf.epiqsystems.com; ECFInbox@epiqsystems.com

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.