

Presentment Date: October 4, 2021, at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: September 28, 2021, at 4:00 p.m. (prevailing Eastern Time)

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Co-Counsel to the Creditor Plan Proponents

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CHINA FISHERY GROUP LIMITED
(CAYMAN), *et al.*,¹

Debtors.

)
) Case No. 16-11895 (JLG)
)
) Chapter 11
)
)
) (Jointly Administered)
)

¹ The debtors in these chapter 11 cases are China Fishery Group Limited (Cayman), Pacific Andes International Holdings Limited (Bermuda), N.S. Hong Investment (BVI) Limited, South Pacific Shipping Agency Limited (BVI), China Fisheries International Limited (Samoa), CFGI (Singapore) Private Limited, Chanery Investment Inc. (BVI), Champion Maritime Limited (BVI), Growing Management Limited (BVI), Target Shipping Limited (HK), Fortress Agents Limited (BVI), Ocean Expert International Limited (BVI), Protein Trading Limited (Samoa), CFG Peru Investments Pte. Ltd. (Singapore), Smart Group Limited (Cayman), Super Investment Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), Nouvelle Foods International Ltd., Golden Target Pacific Limited, Pacific Andes International Holdings (BVI) Limited, Zhonggang Fisheries Limited, Admired Agents Limited, Chiksano Management Limited, Clamford Holding Limited, Excel Concept Limited, Gain Star Management Limited, Grand Success Investment (Singapore) Private Limited, Hill Cosmos International Limited, Loyal Mark Holdings Limited, Metro Island International Limited, Mission Excel International Limited, Natprop Investments Limited, Pioneer Logistics Limited, Sea Capital International Limited, Shine Bright Management Limited, Superb Choice International Limited, and Toyama Holdings Limited (BVI).

In re:)	
)	Case No. 16-11914 (JLG)
CFG PERU INVESTMENTS PTE. LIMITED)	
(SINGAPORE))	Chapter 11
)	
Debtor.)	(Jointly Administered)
)	

**NOTICE OF PRESENTMENT OF
CREDITOR PLAN PROPONENT’S OMNIBUS MOTION
FOR ENTRY OF AN ORDER PURSUANT TO THE *CREDITOR
PLAN PROPONENTS’ CHAPTER 11 PLAN FOR CFG PERU INVESTMENTS
PTE. LTD. (SINGAPORE)* AND SECTION 1129(a)(4) OF THE BANKRUPTCY CODE
(I) APPROVING ALL PRE-CONFIRMATION FEES, EXPENSES, COSTS, AND
DISBURSEMENTS INCURRED BY (A) KASOWITZ BENSON TORRES LLP,
COUNSEL TO CERTAIN HOLDERS OF SENIOR NOTES, (B) DLA PIPER HONG
KONG AND DLA PIPER LLC (U.S.), COUNSEL TO CERTAIN CLUB FACILITY
LENDERS, AND (C) MIRANDA & AMADO ABOGADOS SCRL, COUNSEL TO
CERTAIN CLUB FACILITY LENDERS AND (II) AUTHORIZING AND DIRECTING
THE PLAN ADMINISTRATOR TO CAUSE CFG PERU (OR THE PERUVIAN
OPCOS, OR NEWCO ON BEHALF OF CFG PERU) TO PROMPTLY PAY ALL
SUCH PRE-CONFIRMATION FEES, EXPENSES, COSTS, AND DISBURSEMENTS**

PLEASE TAKE NOTICE that on September 14, 2021, the Creditor Plan Proponents (as defined in the *Creditor Plan Proponents’ Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore)* [Docket No. 2564] (as amended, supplemented, or modified from time to time, the “Plan”)) filed the *Creditor Plan Proponent’s Omnibus Motion for Entry of an Order Pursuant to the Creditor Plan Proponents’ Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore) and Section 1129(a)(4) of the Bankruptcy Code (I) Approving All Pre Confirmation Fees, Expenses, Costs, and Disbursements Incurred by (A) Kasowitz Benson Torres LLP, Counsel to Certain Holders of Senior Notes, (B) DLA Piper Hong Kong and DLA Piper LLC (U.S.), Counsel to Certain Club Facility Lenders, and (C) Miranda & Amado Abogados SCRL, Counsel to Certain Club Facility Lenders and (II) Authorizing and Directing the Plan Administrator to Cause CFG*

Peru (or the Peruvian OpCos, or NewCo on Behalf of CFG Peru) to Promptly Pay All Such Pre-Confirmation Fees, Expenses, Costs, and Disbursements (the “Motion”).

PLEASE TAKE FURTHER NOTICE that on **October 4, 2021, at 10:00 a.m. (prevailing Eastern Time)**, the Creditor Plan Proponents will present the proposed order approving the Motion to the Honorable James L. Garrity, Jr. of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that any responses or objections (each, an “Objection”) to the Motion and the relief requested therein shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), shall set forth the basis for the Objection and the specific grounds therefore, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 by registered users of the Bankruptcy Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court), with two hard copies, printed single-sided, delivered directly to chambers pursuant to Local Rule 9070-1 and served so as to be actually received no later than **September 28, 2021, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”), upon the following parties:

- a. Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn: Patrick J. Nash, Jr., P.C. (patrick.nash@kirkland.com) and Heidi M. Hockberger (heidi.hockberger@kirkland.com) and White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (gregory.pesce@whitecase.com), co-counsel for the Creditor Plan Proponents;
- b. Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001, Attn: Lisa Laukitis (lisa.laukitis@skadden.com) and Clark Xue (clark.xue@skadden.com), and Skadden, Arps, Slate, Meagher & Flom LLP, 500 Boylston Street, Boston, Massachusetts 02116, Attn: Elizabeth Downing

(elizabeth.downing@skadden.com), counsel for Michael Foreman, the Plan Administrator of CFG Peru Investments Pte. Ltd. under the Plan; and

- c. the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Richard Morrissey (richard.morrissey@usdoj.gov);

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Creditor Plan Proponents shall, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form annexed as Exhibit A to the Motion, which order the Bankruptcy Court may enter with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion may be obtained free of charge by visiting the website of Epiq Corporate Restructuring, LLC at <https://dm.epiq11.com/case/chinafishery/>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: September 14, 2021
New York, New York

/s/ Patrick J. Nash, Jr.

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)

Heidi M. Hockberger (admitted *pro hac vice*)

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