

Presentment Date: December 7, 2021 at 12:00 p.m. (prevailing Eastern Time)
Objections Due: December 6, 2021 at 4:00 p.m. (prevailing Eastern Time)

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

In re:)	
)	Case No. 16-11895 (JLG)
CHINA FISHERY GROUP LIMITED (CAYMAN), <i>et al.</i> , ¹)	
)	Chapter 11
Debtors.)	(Jointly Administered)
)	
In re:)	Case No. 16-11914 (JLG)
)	
CFG PERU INVESTMENTS PTE. LTD. (SINGAPORE),)	Chapter 11
)	
Debtor.)	(Jointly Administered)
)	

**NOTICE OF PRESENTMENT OF CREDITOR PLAN PROPONENTS'
FIRST MOTION FOR SANCTIONS IN THE FORM OF COMPENSATORY DAMAGES
AGAINST SUN SECURITIES LIMITED AND CERTAIN AFFILIATED PARTIES FOR
COSTS INCURRED FOR WILLFUL FAILURE TO COMPLY WITH ENFORCEMENT ORDER**

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), CFGL (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).

PLEASE TAKE NOTICE that on November 21, 2021, the Creditor Plan Proponents filed the *Creditor Plan Proponents' First Motion for Sanctions in the Form of Compensatory Damages Against Sun Securities Limited and Certain Affiliated Parties for Costs Incurred for Willful Failure to Comply with Enforcement Order* (the "Motion").

PLEASE TAKE FURTHER NOTICE that on **December 7, 2021, at 12:00 p.m. (prevailing Eastern Time)**, the Creditor Plan Proponents will present the 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, 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 **December 6, 2021, at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"), upon the following parties:

- a. White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (gregory.pesce@whitecase.com), counsel for the Creditor Plan Proponents (as defined in the *Creditor Plan Proponents' Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore)*);
- 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.; 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.

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Dated: November 21, 2021
Chicago, Illinois

/s/ Gregory F. Pesce

Gregory F. Pesce (admitted *pro hac vice*)

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