

BAKER & HOSTETLER LLP
Robert A. Julian (admitted *pro hac vice*)
David J. Richardson (admitted *pro hac vice*)
Transamerica Pyramid Center
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
Telephone: 415.659.2600
Facsimile: 415.659.2601

Counsel for William A. Brandt, Jr., former Chapter 11 Trustee

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

In re: : **Chapter 11**
: :
CHINA FISHERIES GROUP LIMITED (CAYMAN), : **Case No.: 16-11895 (JLG)**
et al., : :
: **Debtors.¹** : **(Jointly Administered)**
: :

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

¹ The Debtors 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. Limited (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, Toyama Holdings Limited (BVI), and Pacific Andes Enterprises (Hong Kong) Limited.

SUPPLEMENTAL DECLARATION OF WILLIAM A. BRANDT, JR., RE: REPLY BRIEF IN SUPPORT OF FIRST AND FINAL FEE APPLICATION OF FORMER CHAPTER 11 TRUSTEE WILLIAM A. BRANDT, JR., FOR COMPENSATION FOR SERVICES RENDERED AS CHAPTER 11 TRUSTEE FOR THE PERIOD FROM NOVEMBER 10, 2016 THROUGH AND INCLUDING JUNE 24, 2021, AND SECOND AND FINAL APPLICATION OF FORMER CHAPTER 11 TRUSTEE WILLIAM A. BRANDT, JR., FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD MARCH 1, 2020 THROUGH AND INCLUDING JUNE 24, 2021

I, William A. Brandt, Jr., being duly sworn, depose and say:

1. I am the former chapter 11 trustee (the “Trustee”) of CFG Peru Investments Pte. Limited (Singapore) (“CFG Peru”), subject to entry of an order of discharge, in the above-captioned chapter 11 cases.

2. I am the Executive Chairman and founder of Development Specialists, Inc. (“DSI”), a restructuring and financial advisory firm that specializes in interim management, turnaround consulting, operational due diligence, creditor advisory services, and financial and operational restructuring. DSI maintains offices at 110 E. 42nd Street, Suite 1818, New York, New York 10017.

3. I submit this Supplemental Declaration in support of the *First and Final Fee Application of Former Chapter 11 Trustee William A. Brandt, Jr., for Compensation for Services Rendered as Chapter 11 Trustee for the Period From November 10, 2016 Through and Including June 24, 2021*; and (ii) *Second and Final Application of Former Chapter 11 Trustee William A. Brandt, Jr., for Reimbursement of Expenses for the Period March 1, 2020 Through and Including June 24, 2021* (the “Fee Application”), and the reply brief in support of the Fee Application, filed contemporaneously herewith. Except as otherwise noted, I have personal knowledge of the matters

set forth herein, either directly or through professionals working at my direction, or through my representatives and advisors and, if called as a witness, I would testify competently thereto.²

4. Attached hereto as Exhibit 1 is a true and correct copy of an email that I received on October 29, 2018, from Liz Downing of Skadden, Arps, Slate, Meagher & Flom LLP (“Skadden”), minus the Rule 408 settlement proposal that had been attached. As the email does not request or transmit legal advice, I do not consider this to be a privileged document.

5. Attached hereto as Exhibit 2 is a true and correct copy of an email that I received on May 22, 2017, from Zachary Lewis of Monarch Alternative Capital LP (“Monarch”).

6. Attached hereto as Exhibit 3 is a true and correct copy of an email that I received on December 24, 2018, from Lisa Laukitis of Skadden, minus the Rule 408 settlement proposal that had been attached. As the email does not request or transmit legal advice, I do not consider this to be a privileged document.

7. Attached hereto as Exhibit 4 is a true and correct copy of an email chain that I exchanged with Andrew Herenstein of Monarch, between January 19-20, 2021, and which originated with the first email in the chain, to me, from Allan Liu, on January 19, 2021.

8. Attached hereto as Exhibit 5 is a true and correct copy of an email that I received from Andrew Herenstein of Monarch on July 4, 2020.

9. Attached hereto as Exhibit 6 is a true and correct copy of an email that I received from Andrew Herenstein of Monarch on July 8, 2020.

10. Attached hereto as Exhibit 7 is a true and correct copy of an email that I received from Andrew Herenstein of Monarch on July 15, 2020.

² Any capitalized term not defined herein carries the meaning ascribed to it in the Fee Application.

11. Attached hereto as Exhibit 8 is a true and correct copy of an email that I received from Andrew Herenstein of Monarch on July 22, 2020.

12. Attached hereto as Exhibit 9 is a true and correct copy of an email that I sent to Lisa Laukitis at Skadden on December 30, 2018.

13. Attached hereto as Exhibit 10 is a true and correct copy of an email that I sent to Andrew Herenstein and others on January 19, 2021.

14. Attached hereto as Exhibit 11 is a true and correct copy of an email that I received from Andrew Herenstein on December 17, 2020, and forwarded to Lisa Laukitis and Liz Downing at Skadden.

15. Attached hereto as Exhibit 12 is a true and correct copy of an email that I sent to Greg Pesce on November 12, 2018.

16. Attached hereto as Exhibit 13 is a true and correct copy of an email exchange that I had with Brad Jordan of Houlihan Lokey on December 11, 2018.

17. Attached hereto as Exhibit 14, for the convenience of the Court, is a true and correct copy of the Dkt. 2542, Declaration of Bradley Jordan in Support of the Creditor Plan Proponents' Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore), filed June 4, 2021 in the CFG Peru case.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, information, and belief, the foregoing is true and correct.

Dated: November 29, 2021



William A. Brandt, Jr., in his capacity as
the former Chapter 11 Trustee of CFG
Peru Investments Pte. Ltd.