

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

Tracy L. Klestadt  
John E. Jureller, Jr.  
Brendan M. Scott  
200 West 41st Street, 17th Floor  
New York, New York 10036  
(212) 972-3000

*Attorneys for the Plan Debtors*

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

-----	X	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>CHINA FISHERY GROUP LIMITED</b>	:	<b>Case No. 16-11895 (JLG)</b>
<b>(CAYMAN) <i>et al.</i>,</b>	:	
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
-----	X	

**DECLARATION IN FURTHER SUPPORT OF PAIH PLAN AND DISCLOSURE  
STATEMENT, AND THE PLAN DEBTORS' MOTION FOR ENTRY OF AN ORDER  
APPROVING (I) DISCLOSURE STATEMENT, (II) FORM OF AND MANNER OF  
NOTICES, (III) FORM OF BALLOTS AND (IV) SOLICITATION  
MATERIALS AND SOLICITATION PROCEDURES**

JOHN E. JURELLER, JR., an attorney duly admitted to practice law before this Court,  
hereby declares, under penalties of perjury, as follows:

---

<sup>1</sup> 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, and Toyama Holdings Limited (BVI).

1. I am a partner of the law firm of Klestadt Winters Jureller Southard & Stevens, LLP, counsel to the Plan Debtors (Pacific Andes International Holdings Limited (Bermuda); Pacific Andes International Holdings (BVI) Limited; Nouvelle Foods International Ltd. (BVI); N.S. Hong Investment (BVI) Limited; Clamford Holding Limited (BVI); and Pacific Andes Enterprises (Hong Kong) Limited), and as such I am fully familiar with the facts and circumstances of this matter.

2. This Declaration is submitted in further support of the *Plan Debtors' Motion for Entry of an Order Approving (I) Disclosure Statement, (II) Form of and Manner of Notices; (III) Form of Ballots and (IV) Solicitation Materials and Solicitation Procedures* (the "Motion") [ECF No. 2686].

3. Since the date of the filing of the Motion, the Debtors have made significant progress in resolving material disputes with certain creditors. The Debtors have reached a settlement in principle with the Liquidators and the Liquidator-Controlled Companies, subject to finalizing the terms of the settlement agreement. The Debtors have reached a global settlement in principle with HSBC-HK, subject to finalizing the terms of the proposed Settlement Deed. The Debtors believe that they have resolved any outstanding objections related to the Disclosure Statement including through amendments to the Disclosure Statement and PAIH Plan.

4. Attached hereto as Exhibit A is a true and correct copy of the Disclosure Statement for the Second Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.<sup>2</sup>

---

<sup>2</sup> The Plan Debtors reserve the right to further amend and supplement the Disclosure Statement and Plan, including to incorporate the terms of the settlements with (i) the Liquidators and Liquidator-Controlled Companies and (ii) HSBC-HK once finalized.

5. Attached hereto as **Exhibit B** is a *blacklined* version of the Disclosure Statement for the Second Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

6. Attached hereto as **Exhibit C** is a true and correct copy of the Second Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

7. Attached hereto as **Exhibit D** is a *blacklined* version of the Second Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

8. Attached hereto as **Exhibit E** is the revised liquidation analysis for Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

9. Attached hereto as **Exhibit F** is Schedule 5.2 (Intercompany Claims) to the Second Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

10. Attached hereto as **Exhibits G** is the form of ballot for each of the classes entitled to vote. The ballots will be utilized to solicit votes from Holders of Claims in Class 5 (Maybank PATM Term Loan Claims), Class 6 (Maybank Banking Facility Claims), Class 7 (Rabobank Europaco Trade Facility Claims), Class 8 (Rabobank NFS Facility Claims), Class 9 (Standard Chartered Banking Trade Facility Claims), Class 10 (CITIC Banking Facility Claims), Class 11 (Pickenpack Letters of Comfort Claims), Class 12 (KBC Facility Claims), Class 13 (UOB Banking Facility Claims), Class 14 (Fubon Factoring Facility Claims), Class 15 (Richtown Intercompany Claims), Class 16 (Pacos Trading Intercompany Claims), Class 17 (PAE (BVI) Intercompany

Claims), Class 18 (PAIH General Unsecured Claims), Class 19 (PAE HK Loan Claim), and Class 20 (Teh Hong Eng Loan Claims (collectively, the “Voting Classes”).

11. Attached hereto as **Exhibits H** is the form of *Notification of Non-Voting Status And Notice of Opt Out of Third-Party Release* which shall be served upon all parties not entitled to vote under the PAIH Plan.

Dated: December 15, 2021

/s/John E. Jureller, Jr.  
John E. Jureller, Jr.