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

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| In re | : | Chapter 11 |
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| CHINA FISHERY GROUP LIMITED (CAYMAN) et al., | : | Case No. 16-11895 (JLG) |
| | : | |
| Debtors.¹ | : | (Jointly Administered) |
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**SECOND SUPPLEMENTAL DECLARATION IN FURTHER SUPPORT OF CFGL
PLAN DEBTORS' AND PARD PLAN DEBTORS' PLAN AN DISCLOSURE
STATEMENT, AND 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:

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), 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. 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 Debtors, and as such I am fully familiar with the facts and circumstances of this matter.

2. This Second Supplemental Declaration is submitted in further support of the *CFGL Plan Debtors² And PARD Plan Debtors³ 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. 2688].

3. Attached hereto as **Exhibit A** is a true and correct copy of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors.

4. Attached hereto as **Exhibit B** is a *blacklined* version of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors.

² The CFGL Plan Debtors are: China Fishery Group Limited (Cayman), Smart Group Limited (Cayman), Grand Success Investment (Singapore) Private Limited (Singapore), South Pacific Shipping Agency Ltd. (BVI), China Fisheries International Limited (Samoa), Target Shipping Limited (HK), Ocean Expert International Limited (BVI), Toyama Holdings Limited (BVI), Hill Cosmos International Limited (BVI), Chiksano Management Limited (BVI), Gain Star Management Limited (BVI), Chanery Investment Inc. (BVI), Admired Agents Limited (BVI), Excel Concept Limited (BVI), Metro Island International Limited (BVI), Loyal Mark Holdings Limited (BVI), Mission Excel International Limited (BVI), Superb Choice International Limited (BVI), Growing Management Limited (BVI), Sea Capital International Limited (BVI), Shine Bright Management Limited (BVI), Champion Maritime Ltd. (BVI), Pioneer Logistics Ltd. (BVI), CFGL (Singapore) Private Limited (Singapore), Fortress Agents Ltd. (BVI), and Protein Trading Ltd. (Samoa).

³ The PARD Plan Debtors are: Pacific Andes Resources Development Limited (Bermuda), Golden Target Pacific Limited (BVI), Zhonggang Fisheries Limited (BVI), Super Investment Limited (Cayman), and Natprop Investments Limited (Cook Islands).

5. Attached hereto as **Exhibit C** is a true and correct copy of the Fourth Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors.

6. Attached hereto as **Exhibit D** is a *blacklined* version of the Fourth Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors.

7. Attached hereto as **Exhibit E** is the revised liquidation analysis for China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors.

8. Attached hereto as **Exhibit F** is the further revised proposed Order Approving (I) Disclosure Statement, (II) Form and Manner of Notices, (III) Form of Ballots and (IV) Solicitation Materials and Solicitation Procedures.

9. Attached hereto as **Exhibit G** is the revised *Notice of (A) Hearing to Confirm For Fourth Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda), and Certain of Their Affiliated Debtors, and (B) Date By Which to Submit Objections.*

Dated: December 21, 2021

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