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

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<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>
	:	
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**SECOND SUPPLEMENTAL 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:

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<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 Supplemental 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. 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 Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.<sup>2</sup>

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 Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors.

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

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<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.

7. Attached hereto as **Exhibit E** is the revised *Notice of (A) Hearing to Confirm For Fourth Amended Joint Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of Its Affiliated Debtors, and (B) Date By Which to Submit Objections.*

Dated: December 21, 2021

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