

WHITE & CASE LLP

111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Facsimile: (312) 881-5450
Gregory F. Pesce (admitted *pro hac vice*)

Counsel to the Creditor Plan Proponents

WHITE & CASE LLP

1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Gregory Starmer
Barrett Lingle (admitted *pro hac vice*)

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

In re:

CHINA FISHERY GROUP LIMITED (CAYMAN), *et al.*,¹

Debtors.

)
) Case No. 16-11895 (JLG)
)
) Chapter 11
)
) (Jointly Administered)
) **Docket No. 2852**

In re:

CFG PERU INVESTMENTS PTE. LTD. (SINGAPORE),

Debtor.

)
) Case No. 16-11914 (JLG)
)
) Chapter 11
)
) (Jointly Administered)
) **Docket No. 736**

**NOTICE OF FAILURE TO COMPLY WITH ORDER
GRANTING CREDITOR PLAN PROPONENTS' MOTION FOR ENTRY OF
AN ORDER DIRECTING PRODUCTION OF DOCUMENTS PURSUANT
TO RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

PLEASE TAKE NOTICE that on November 11, 2021, the Creditor Plan Proponents (as defined in the *Creditor Plan Proponents' Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore)* [Docket No. 2564] (as amended, supplemented, or modified from time to time, the "**Chapter 11 Plan**")) filed the *Creditor Plan Proponents' Motion for Entry of an 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), 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. 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).

Directing Production of Documents Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure [Docket No. 2809] (the “**Rule 2004 Motion**”).²

PLEASE TAKE FURTHER NOTICE that on December 16, 2021, the Court entered an order granting the Rule 2004 Motion [Docket No. 2852] (the “**Rule 2004 Order**”). The Rule 2004 Order stated that Sun Securities was directed to provide to the Creditor Plan Proponents all documents responsive to the requests set forth in Schedule A to the Rule 2004 Motion on or before January 12, 2022 (the “**Production Deadline**”).

PLEASE TAKE FURTHER NOTICE that on December 17, 2021, the Creditor Plan Proponents caused the Rule 2004 Order to be served on Sun Securities via overnight mail and email. *See Affidavit of Service* [Docket No. 2858]. On December 20, 2021, a copy of the Rule 2004 Order was hand delivered via messenger service to Sun Securities. *See Supplemental Affidavit of Service* [Docket No. 2864].

PLEASE TAKE FURTHER NOTICE that Sun Securities did not comply with the Rule 2004 Order. As of the Production Deadline, Sun Securities had not provided the Creditor Plan Proponents with documents responsive to the requests set forth in Schedule A to the Rule 2004 Motion.

PLEASE TAKE FURTHER NOTICE that the Creditor Plan Proponents reserve all rights with respect to Sun Securities, including Sun Securities’ failure to comply with the Rule 2004 Order.

² Capitalized terms used in this notice but not defined herein shall have the meanings ascribed to such terms in the Rule 2004 Motion.

Dated: January 14, 2022

/s/ Gregory F. Pesce

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

WHITE & CASE LLP

111 South Wacker Drive, Suite 5100

Chicago, Illinois 60606

Telephone: (312) 881-5400

Facsimile: (312) 881-5450

- and -

Gregory Starnes

Barrett Lingle (admitted *pro hac vice*)

WHITE & CASE LLP

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 819-8200

Facsimile: (212) 354-8113

Counsel to the Creditor Plan Proponents