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*Attorneys HSBC North America Holdings Inc.,
HSBC North America Inc., and HSBC USA Inc.*

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

In re:

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

Debtors.

Case No. 16-11895 (JLG)

Chapter 11 (Jointly Administered)

In re:

CFG PERU INVESTMENTS PTE, LTD.
(SINGAPORE),

Debtor.

Case No. 16-11914 (JLG)

Chapter 11

DECLARATION OF NICOLE A. ANNUNZIATA

Nicole A. Annunziata, being of full age, hereby declares as follows:

1. I am a Legal Paper Regulatory Specialist of HSBC Technology Services USA, which provides legal paper processing retrieval and support services to HSBC Bank USA, N.A. and its United States-based affiliates. I have been employed by HSBC Technology Services USA since December 2, 2013. During that time, I have developed familiarity with records maintained by HSBC Bank

USA, N.A and its United States-based affiliates and the efforts undertaken to comply with subpoenas.

2. William A. Brandt, Jr., Chapter 11 Trustee ("Trustee") for CFG Peru Investments Pte. Ltd. (Singapore) ("CFG Peru") served his Motion for Order Authorizing Issuance of Subpoenas to Hongkong and Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses ("Discovery Motion") on HSBC North America Holdings Inc., HSBC North America Inc., and HSBC USA Inc. (collectively, together with United States-based affiliates, referred to as "HSBC US"). The Certificate of Service the Trustee filed also references HSBC Holdings Inc., but that is not an active entity.

3. While the Discovery Motion concerns directing subpoenas to The Hongkong and Shanghai Banking Corporation Limited ("HBAP"), as HSBC US was served with the motion, HSBC US objects to the Discovery Motion to the extent that the Trustee seeks to direct subpoenas to HSBC US.

4. HSBC North America Holdings Inc. and HSBC North America Inc. are incorporated in Delaware and have their principal place of business in New York, and HSBC USA Inc. is incorporated in Maryland and has its principal place of business in New York. The HSBC US entities are indirectly owned by HSBC Holdings plc, a United Kingdom corporation.

5. HBAP is incorporated and headquartered in Hong Kong. HBAP is indirectly owned by HSBC Holdings plc.

6. The HSBC US entities are separate and distinct from HBAP and all other foreign HSBC affiliates.

7. HSBC US has never had a lending or banking relationship with CFG Peru or any of the Debtors set forth in footnote 1 of the Discovery Motion.

8. Through the Discovery Motion, the Trustee seeks to obtain information regarding the CF Group (as defined in footnote 4 of the Discovery Motion). HSBC US has never had any lending or banking relationship with the CF Group.

9. As a result, HSBC US does not have any knowledge, information, or documents concerning the topics upon which the Trustee seeks discovery. *See* Discovery Motion at ¶ 4.

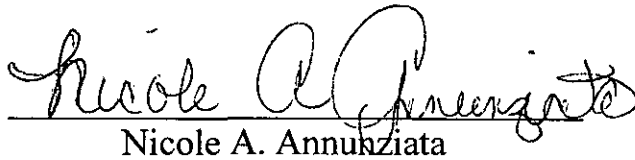
10. Nor can HSBC US obtain the documents sought by the Trustee from HBAP. The HSBC US entities maintain their own computer systems, which are separate and apart from any systems or databases of HBAP or any other foreign HSBC entities. Documents of the type requested in the Discovery Motion do not flow freely between HBAP and HSBC US, and HSBC US does not otherwise access HBAP's documents in the ordinary course of business. The HSBC US entities do not have access to the records and systems of HBAP or any other foreign

HSBC entities, and thus lending and account records, as well as information and documents concerning the items sought by the Trustee, that are maintained by HBAP or any other foreign HSBC entities are not within the possession, custody, or control of HSBC US.

11. HSBC US likewise does not have the practical ability to obtain from HBAP (or any other HSBC foreign entities) information or documents concerning the items sought by the Trustee, as based upon my experience from similar third-party document requests, such information would not be provided to HSBC US upon request.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2017


Nicole A. Annunziata