

Presentment Date and Time: January 19, 2017 at 12:00 p.m.  
Objection Deadline: January 17, 2017 at 4:00 p.m.  
Hearing Date: None, unless objections are filed

Susheel Kirpalani  
James C. Tecce  
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*Proposed Special Litigation Counsel to William A. Brandt Jr.,  
Chapter 11 Trustee for CFG Peru Investments Pte. Ltd. (Singapore)*

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

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In re: : Case No. 16-11895 (JLG)  
: :  
CHINA FISHERY GROUP LIMITED : Chapter 11 (Jointly Administered)  
(CAYMAN), et al., : :  
: :  
Debtors.<sup>1</sup> : :  
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In re: : Case No. 16-11914 (JLG)  
: :  
CFG PERU INVESTMENTS PTE. LTD. : Chapter 11  
(SINGAPORE), : :  
: :  
Debtor. : :  
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**NOTICE OF APPLICATION OF WILLIAM A. BRANDT, JR.,  
CHAPTER 11 TRUSTEE FOR CFG PERU INVESTMENTS PTE. LTD.  
(SINGAPORE), FOR ENTRY OF AN ORDER PURSUANT TO  
11 U.S.C. §§ 327(a), 328(a), AND 330, AUTHORIZING RETENTION  
AND EMPLOYMENT OF QUINN EMANUEL URQUHART &  
SULLIVAN, LLP AS SPECIAL LITIGATION COUNSEL EFFECTIVE  
NUNC PRO TUNC TO DECEMBER 23, 2016**

<sup>1</sup> The Debtors in Case No. 16-11895 (JLG) are China Fishery Group Limited (Cayman) (“CFGL”), Pacific Andes International Holdings Limited (Bermuda) (“PAIH”), N.S. Hong Investment (BVI) Limited (“NS Hong”), South Pacific Shipping Agency Limited (BVI) (“SPSA”), China Fisheries International Limited (Samoa) (“CFIL”), CFGL (Singapore) Private Limited (“CFGLPL”), Chanery Investment Inc. (BVI) (“Chanery”), Champion Maritime Limited (BVI) (“Champion”), Growing Management Limited (BVI) (“Growing Management”), Target Shipping Limited (HK) (“Target Shipping”), Fortress Agents Limited (BVI) (“Fortress”), Ocean Expert International Limited (BVI) (“Ocean Expert”), Protein Trading Limited (Samoa) (“Protein Trading”), CFG Peru Investments Pte. Limited (Singapore) (“CFG Peru Singapore”), Smart Group Limited (Cayman) (“Smart Group”), Super Investment Limited (Cayman) (“Super Investment”), and Pacific Andes Resources Development Ltd. (“PARD”).

**PLEASE TAKE NOTICE** that William A. Brandt, Jr., the Chapter 11 Trustee (the “Trustee”) for the bankruptcy estate of CFG Peru Investments Pte. Ltd. (Singapore) (the “Debtor”), hereby files the *Application Of William A. Brandt., Jr., Chapter 11 Trustee For CFG Peru Investments Pte. Ltd. (Singapore), For Entry Of An Order Pursuant To §§ 327(a), 328(a), And 330, Authorizing Retention And Employment Of Quinn Emanuel Urquhart & Sullivan, LLP As Special Litigation Counsel Effective Nunc Pro Tunc To December 23, 2016* (the “Application”).

**PLEASE TAKE FURTHER NOTICE** that the undersigned will present the proposed *Order Pursuant To 11 U.S.C. §§ 327(a), 328(a), And 330, Granting Application Of William A. Brandt, Jr., Chapter 11 Trustee For CFG Peru Investments Pte. Ltd. (Singapore), To Retain And Employ Quinn Emanuel Urquhart & Sullivan, LLP As Special Litigation Counsel Effective Nunc Pro Tunc To December 23, 2016* (the “**Proposed Order**”) to the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, for signature and entry on January 19, 2017 at 12:00 p.m. (prevailing Eastern Time), at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004-1408 (the “**Presentment Date**”).

**PLEASE TAKE FURTHER NOTICE** that objections to the Proposed Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with two hard copies delivered

directly to Chambers and served so as to be actually received no later than January 17, 2017 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”), upon:

- i. counsel for China Fishery Group Limited (Cayman), *et al.*, Meyer, Suozzi, English & Klein, P.C., 990 Stewart Avenue, Suite 300, Garden City, New York 11530, Attn: Howard B. Kleinberg, Edward J. LoBello, Jil Mazer-Marino
- ii. Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Susan Golden;
- iii. counsel for William A. Brandt, Jr., the Chapter 11 Trustee for the bankruptcy estate of CFG Peru Investments Pte. Ltd., Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036 Attn: Jay M. Goffman, and Skadden, Arps, Slate, Meagher & Flom LLP, One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636, Attn: Sarah E. Pierce; and
- iv. proposed special counsel for William A. Brandt, Jr., the Chapter 11 Trustee for the bankruptcy estate of CFG Peru Investments Pte. Ltd., Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22 Floor, New York, New York 10010 Attn: Susheel Kirpalani, James Tecce.

**PLEASE TAKE FURTHER NOTICE** that if no responses or objections are timely filed and served the Proposed Order may be signed. If an objection is timely filed and served, the Court may schedule a hearing at any time on or after the Presentment Date. Objecting parties are required to attend any such hearing, and failure to appear at any such hearing may result in the relief requested in the Application being granted upon default.

Dated: January 9, 2017  
New York, New York

/s/ Susheel Kirpalani

Susheel Kirpalani  
James C. Tecce  
Jordan Harap  
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SULLIVAN, LLP  
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