Presentment Date: November 30, 2020 at 12:00 p.m. (prevailing Eastern Time)

Lynn P. Harrison III, Esq.

**DENTONS US LLP** 

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Counsel for the Pickenpack Group

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

In re:

CHINA FISHERY GROUP LIMITED
(CAYMAN), et al,

Debtors.¹

Case No. 16-11895 (JLG)
(Jointly Administered)

CFG Peru Investments Pte. Limited
(Singapore),

Debtor.

# NOTICE OF PROPOSED STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL

**PLEASE TAKE NOTICE** that a certain *Stipulation and Order for Substitution of Counsel* (the "<u>Stipulation</u>"), annexed hereto as an <u>Exhibit</u>, substituting as the counsel of record the law firm of Dentons US LLP, in the place and stead of the law firm of Curtis, Mallet-Prevost,

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).

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Colt & Mosle LLP, as counsel to Friedrich von Kaltenborn-Stachau, in his capacity as

Insolvency Administrator (*Insolvenzverwalter*) (the "Insolvency Administrator") of Pickenpack

Production Lüneburg GmbH ("Pickenpack Production"), Pickenpack Europe GmbH

("Pickenpack Europe"), Pickenpack Holding Germany GmbH ("Pickenpack Holding") and TST

The Seafood Traders GmbH ("TST", together with Pickenpack Production, Pickenpack Europe

and Pickenpack Holding, the "Pickenpack Group") will be presented to the Honorable James L.

Garrity Jr., United States Bankruptcy Judge for the Southern District of New York, at the United

States Bankruptcy Court, One Bowling Green, Courtroom 601, New York, New York 10004-1408

(the "Court"), for signature on November 30, 2020, at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that copies of the Stipulation, the Order

Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c), 2002(m), and 9007 and all other

documents filed in the chapter 11 cases may be obtained free of charge by visiting the website of

Epiq Bankruptcy Solutions, at https://dm.epiq11.com/case/chinafishery/dockets. You may also

obtain copies of any pleadings by visiting the Court's website at http://www.nysb.uscourts.gov

in accordance with the procedures and fees set forth therein.

Dated: November 20, 2020

/s/ Lynn P. Harrison III

Lynn P. Harrison III, Esq. **DENTONS US LLP** 

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New York, New York 10020

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Counsel to the Pickenpack Group

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#### **EXHIBIT**

### PROPOSED STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL

Lynn P. Harrison III, Esq. **DENTONS US LLP** 

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Counsel for the Pickenpack Group

Peter J. Buenger, Esq.

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

101 Park Ave

New York, NY 10178 Telephone: (212) 696-6000 Facsimile: (917) 368-7349

pbuenger@curtis.com

Former Counsel to the Pickenpack Group

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

CHINA FISHERY GROUP LIMITED (CAYMAN), et al,

Debtors.1

Debtor

CFG Peru Investments Pte. Limited (Singapore),

Debtor.

Chapter 11

Case No. 16-11895 (JLG)

(Jointly Administered)

Chapter 11

Case No. 16-11914 (JLG)

(Jointly Administered)

#### STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND ORDERED, and at the request of the Insolvency

Administrator (defined below) pursuant to Local Bankruptcy Rule 2090-1, that the law firm of

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In re:

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).

Dentons US LLP ("Dentons"), 1221 Avenue of the Americas, 25th Floor, New York, New

York 10022, is hereby substituted as the counsel of record for Friedrich von Kaltenborn-

Stachau, in his capacity as Insolvency Administrator (Insolvenzyerwalter) (the "Insolvency

Administrator") of Pickenpack Production Lüneburg GmbH ("Pickenpack Production"),

Pickenpack Europe GmbH ("Pickenpack Europe"), Pickenpack Holding Germany GmbH

("Pickenpack Holding") and TST The Seafood Traders GmbH ("TST", together with

Pickenpack Production, Pickenpack Europe and Pickenpack Holding, the "Pickenpack

Group"), in the place and stead of the law firm of Curtis, Mallet-Prevost, Colt & Mosle LLP,

101 Park Ave., New York, NY 10178, in the above-referenced chapter 11 cases.

All future pleadings and correspondence in this matter should be directed to Lynn. P.

Harrison III at the following addresses:

Lynn P. Harrison III, Esq. **DENTONS US LLP** 

1221 Avenue of the Americas

New York, New York 10020 Telephone: (212) 768-6700

Facsimile: (212) 768-6800

Email: lynn.harrisoniii@dentons.com

Dentons shall serve as counsel for the Pickenpack Group with respect to all outstanding

and future matters in these chapter 11 cases.

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Curtis, Mallet-Prevost, Colt & Mosle LLP requests that it be removed from the CM/ECF electronic notification service, official mailing matrix, and other service lists in the above-captioned proceedings.

Dated: November 20, 2020

/s/ Lynn P. Harrison III

Lynn P. Harrison III, Esq. DENTONS US LLP 1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 768-6700

Facsimile: (212) 768-6800

Counsel to the Pickenpack Group

/s/ Peter J. Buenger

Peter J. Buenger, Esq. Curtis, Mallet-Prevost, Colt & Mosle LLP 101 Park Ave New York, NY 10178

Telephone: (212) 696-6000 Facsimile: (917) 368-7349

Former Counsel to the Pickenpack Group

SO ORDERED THIS \_\_\_\_ DAY OF NOVEMBER 2020

THE HONORABLE JAMES L. GARRITY, JR. UNITED STATES BANKRUPTCY JUDGE

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