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

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In re:

CHINA FISHERY GROUP LIMITED  
(CAYMAN), *et al.*,<sup>1</sup>

Debtors.

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)  
) Case No. 16-11895 (JLG)  
)  
) Chapter 11  
)  
)  
) (Jointly Administered)  
) **Re: Docket No. 2409**

**CREDITOR PLAN PROPONENTS’  
RESERVATION OF RIGHTS REGARDING THE  
CHAPTER 11 TRUSTEE’S EMERGENCY MOTION FOR AN ORDER  
(I) APPROVING BIDDING PROCEDURES, (II) APPROVING THE FORM AND  
MANNER OF NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF<sup>2</sup>**

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The Creditor Plan Proponents (as defined in the *Creditor Plan Proponents’ Chapter 11  
Plan for CFG Peru Investments Pte. Ltd. (Singapore) and Smart Group Limited (Cayman)*)

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<sup>1</sup> 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. Limited (Singapore), Smart Group Limited (Cayman), and Super Investment Limited (Cayman) (collectively, the “Debtors”).

<sup>2</sup> The notice address of the Creditor Plan Proponents for purposes of these chapter 11 cases is: Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois 60654, Attn.: Patrick J. Nash, Jr., P.C., Gregory F. Pesce, and Heidi M. Hockberger.

[Docket No. 2418] (as amended, supplemented, or modified from time to time, the “Plan”)) have engaged in discussions with the Chapter 11 Trustee (as defined in the Plan) regarding the relief requested in the *Chapter 11 Trustee’s Emergency Motion for an Order (I) Approving Bidding Procedures, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief* [Docket No. 2409] (the “Motion”) and certain other related matters, including the argument set forth in the *Creditor Plan Proponents’ Omnibus Reply to Objections to Approval of the Disclosure Statement for the Creditor Plan Proponents’ Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore) and Smart Group Limited (Cayman)* [Docket No. 2415], which is incorporated by reference herein. Those discussions remain ongoing. Accordingly, the Creditor Plan Proponents reserve all their rights regarding the Motion and their right to be heard at the hearing.

*[Remainder of page intentionally left blank]*

Dated: April 20, 2021  
Chicago, Illinois

/s/ Gregory F. Pesce

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