	X	
In re:	: :	Case No. 16-11895 (JLG)
CHINA FISHERY GROUP LIMITED (CAYMAN), et al.,	:	Chapter 11 (Jointly Administered)
Debtors. <sup>1</sup>	:	
In re:	X :	Case No. 16-11914 (JLG)
CFG PERU INVESTMENTS PTE. LTD. (SINGAPORE),	: :	Chapter 11
Debtor.	: : x	

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

# NOTICE OF FEES FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED BY QUINN EMANUEL URQUHART & SULLIVAN LLP FOR THE POST-CONFIRMATION PERIOD AS FORMER SPECIAL LITIGATION COUNSEL TO THE CHAPTER 11 TRUSTEE

PLEASE TAKE NOTICE that on June 10, 2021, the Court entered an order confirming the Creditor Plan Proponents' Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore) (the "Plan") [Docket No. 2569]. Prior to the entry of this order, Quinn Emanuel Urquhart &

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), Smart Group Limited (Cayman) ("Smart Group"), and Super Investment Limited (Cayman) ("Super Investment"); 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).

Sullivan LLP ("Quinn Emanuel") represented William A. Brandt, Jr. in his capacity as the chapter 11 trustee (the "Chapter 11 Trustee"). In the period since the Court entered the order confirming the Plan, Quinn Emanuel has incurred limited fees and expenses in connection with its former representation of the Chapter 11 Trustee.

PLEASE TAKE FURTHER NOTICE that a hearing on the Twelfth Interim and Final Fee Application of Quinn Emanuel Urquhart & Sullivan LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Litigation Counsel to the Chapter 11 Trustee for (I) The Twelfth Interim Period From November 1, 2020 Through June 10, 2021 and (II) The Entire Case Period From December 23, 2016 Through June 10, 2021 (the "Application") will be held telephonically before the Honorable James L. Garrity, Jr., United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004 (the "Bankruptcy Court"), on October 27, 2021 at 11:00 a.m. (Prevailing Eastern Time) (the "Hearing").

PLEASE TAKE FURTHER NOTICE that pursuant to the Application, Quinn Emanuel requested payment of fees and expenses incurred in connection with its former representation of the Chapter 11 Trustee during the post-confirmation period in an amount equal to the lower of \$50,000 or the actual amounts incurred during the post-confirmation period. At the request of the Office of the United States Trustee, Quinn Emanuel submits this notice and the time detail attached as Exhibit A with respect to the Post-Confirmation Fees. Quinn Emanuel's fees and expenses during the post-confirmation period were equal to \$37,050.67, and Quinn Emanuel seeks payment of \$35,341.69, which is equal to its post-confirmation fees and expenses

less \$1,708.98 that Quinn Emanuel has agreed to write-off pursuant to discussions with the United States Trustee.

Dated: October 26, 2021 New York, New York

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ JAMES C. TECCE

James C. Tecce Jordan Harap 51 Madison Avenue, 22<sup>nd</sup> Floor New York, NY 10010 (212) 849-7199

Special Litigation Counsel to William A. Brandt Jr., Chapter 11 Trustee for CFG Peru Investments Pte. Ltd. (Singapore)

### Exhibit A

**Time Detail** 

16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 5 of 11

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865 S. Figueroa Street, 10th Floor Los Angeles, California 90017 LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY |
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October 26, 2021

William A. Brandt, Jr. Development Specialists, Inc. 110 East 42nd Street - Suite 1818 New York, NY 10017

Matter #: 07428-00001

Invoice Number: 101-0000125272

Responsible Attorney: Susheel Kirpalani

#### In re: CFG Peru Investments Pte. Ltd.

For Professional Services through October 26, 2021 in connection with representing William A. Brandt, Jr., as Chapter 11 Trustee for CFG Peru as special counsel.

Fees	\$36,789.00
Expenses	\$261.67
Net Amount	\$37,050.67
Total Due This Invoice	\$37,050.67

# 16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 6 of 11

### quinn emanuel trial lawyers

October 26, 2021 Matter #: 07428-00001
Page 2 Invoice Number: 101-0000125272

#### **Statement Detail**

CF02 Litig	<u>ration</u>			
10/22/21	JH1	Prepare for final fee hearing (1.8).	1.80	1,710.00
10/25/21	JH1	Review comments from UST (.3); call with UST re: fee hearing (0.4); prepare for fee hearing (1.5).	2.20	2,090.00
10/26/21	JH1	Prepare notice (0.8); emails with Skddan re: same (0.1); prepare for fee hearing (1.0).	1.90	1,805.00
		SUBTOTAL	5.90	5,605.00
CF03 Fee	<u>Applications</u>			
07/06/21	CG3	Prepare interim fee application copies for court (0.3).	0.30	106.50
07/13/21	JH1	Emails with Skadden re: fee applications (0.3).	0.30	276.00
07/13/21	CG3	Prepare consolidated monthly fee application (1.4).	1.40	497.00
07/19/21	CG3	Prepare final version of consolidated monthly fee statement (0.2).	0.20	71.00
07/20/21	JH1	Prepare for fee hearing (1.8); attend fee hearing (1.0).	2.80	2,576.00
07/21/21	CG3	Correspond with J. Harap and clerks' office re filing of consolidated monthly fee statement (0.3); review and revise statement as per Skadden (0.2).	0.50	177.50
07/21/21	JH1	Coordinate with C. Garvey re: fee application filing (0.2); emails with Skadden re: same (0.2).	0.40	368.00
07/22/21	CG3	Coordinate filing of consolidated monthly fee statement (0.3).	0.30	106.50
08/31/21	CG3	Prepare draft final fee application and certification (1.6).	1.60	568.00
09/01/21	CG3	Review and revise draft final fee application (0.9).	0.90	319.50
09/05/21	JH1	Prepare twelfth interim and final fee application (2.5).	2.50	2,375.00
09/07/21	CG3	Call with J. Harap re final fee application (0.3); review and revise final fee application (0.9).	1.20	426.00

# 16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 7 of 11

## quinn emanuel trial lawyers

October 26, 2 Page 3	2021		Matter #: 07428-0 nber: 101-000012	
09/08/21	CG3	Review and revise final fee application (8.5).	8.50	3,017.50
09/09/21	ЈН1	Review past interim and monthly fee applications (1.5); attention to reconciliation issues (1.4); review and revise fee application (2.4); review Skadden fee application and related final fee applications (1.4).	6.70	6,365.00
09/09/21	CG3	Review and revise final fee application (3.3).	3.30	1,171.50
09/10/21	JH1	Prepare final fee application (4.5); emails with C. Garvey re: same (0.4); call with C. Garvey re: same (0.3).	5.20	4,940.00
09/10/21	CG3	Review and revise final fee application (3.9).	3.90	1,384.50
09/11/21	JH1	Prepare final fee application (1.4).	1.40	1,330.00
09/13/21	CG3	Review and revise final fee application (2.8); coordinate filing of final fee application (0.6).	3.40	1,207.00
09/13/21	JH1	Emails re: fee app filing (0.2); review document and coordinate filing (0.4).	0.60	570.00
09/13/21	EJ2	E filed the following in SDNY-Bankruptcy NOTICE OF FILING OF TWELFTH INTERIM AND FINAL FEE APPLICATION OF QUINN EMANUEL URQUHART & SULLIVAN, LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED. (.40).	0.40	162.00
09/13/21	JH1	Revise final fee application (0.7); call with J. Tecce re: same (0.1); email with Skadden re: same (0.1); review before filing (0.3).	1.20	1,140.00
09/13/21	JCT	Review final fee application (0.7).	0.70	924.00
09/14/21	CG3	Prepare courtesy and service copies of final fee application (0.3).	0.30	106.50
10/26/21	CG3	Prepare notice of fees (1.0).	1.00	355.00
		SUBTOTAL	49.00	30,540.00
CF07 Claim	s Administra	ntion and Objections		
07/19/21	JH1	Review and revise consolidated monthly fee application (0.7).	0.70	644.00
		SUBTOTAL	0.70	644.00

# 16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 8 of 11

### quinn emanuel trial lawyers

October 26, 2021 Matter #: 07428-00001
Page 4 Invoice Number: 101-0000125272

#### **Fee Summary**

Attorneys	Init.	Title	Hours	Rate	Amount
James C. Tecce	JCT	Partner	0.70	1,320.00	924.00
Jordan Harap	JH1	Associate	23.50	950.00	22,325.00
Jordan Harap	JH1	Associate	4.20	920.00	3,864.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Eugenia Jones	EJ2	Managing Clerk	0.40	405.00	162.00
Caitlin Garvey	CG3	Paralegal	26.80	355.00	9,514.00

#### **Expense Summary**

Description		Amount
Express mail		68.24
Messenger		43.00
Document Services	per page based on market not cost	42.93
Conference Fee		70.00

#### **Litigation Support Costs**

(Charges based on market not cost)

Hosting per GB - 7.50 37.50

Total Expenses \$261.67

#### **Expense Detail**

Date	Code Description	Rate	Amount	Index	Loc	Tax
07/06/21	2077 Document Services - TAX/C. GARVEY/0200695	0.84	0.84	35964362	NY	USO
07/06/21	2059 Document services - PRINTS/C. GARVEY/0200695	0.07	9.52	35964363	NY	USO

# 16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 9 of 11

### quinn emanuel trial lawyers

 October 26, 2021
 Matter #: 07428-00001

 Page 5
 Invoice Number: 101-0000125272

Date	Code	Description	Rate	Amount	Index	Loc	Tax
07/20/21	2058	Jordan Harap - Conference Fee Court Calls - Jordan Harap - Case Name: In re China Fishery Group Ltd Case Number: 16-11895 Judge: James Garrity Date and Time of Hearing: 7/20/2021 11:00 AM EST 07/20/21	70.00	70.00	35987246	NY	USO
07/22/21	2077	Document Services - TAX/C. GARVEY/0200955	0.70	0.70	35994507	NY	USO
07/22/21	2059	Document services - PRINTS/C. GARVEY/0200955	0.07	7.84	35994506	NY	USO
07/28/21	3060	Hosting (Per GB)	7.50	37.50	36026368	NY	USO
07/30/21	1904	FEDERAL EXPRESS CORPORATION - Invoice No: 745248622 Paid to: Fedex per Caitlin Garvey Ship To: Judge James L Garrity, Jr Ship Dt: 07/23/21 Airbill: 281756679300 07428 00001 978223: Most cost efficient method of proof of delivery.	16.90	16.90	36021060	NY	USO
08/05/21	1910	CITY EXPEDITOR, INC - Messenger / From QE to SDNY - 7/6/21	43.00	43.00	36054987	NY	USO
09/10/21	1904	Federal Express (Hong Kong) Limited - Express mail-#07428- 00001/Courier service charge for sending documents to client, Mr William A. Brandt, Jr in New York on 12 August 2021	34.41	34.41	36381047	NY	USO
09/14/21	2059	Document services - PRINTS/C. GARVEY/0202023	0.07	19.81	36275900	NY	USO
09/14/21	2041	Document services - TABS/C. GARVEY/0202023	0.37	2.23	36275899	NY	USO
09/14/21	2077	Document Services - TAX/C. GARVEY/0202023	1.99	1.99	36275898	NY	USO

# 16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 10 of 11

### quinn emanuel trial lawyers

 October 26, 2021
 Matter #: 07428-00001

 Page 6
 Invoice Number: 101-0000125272

Date Code Description Rate Amount Index Loc Tax 09/17/21 1904 FEDERAL EXPRESS 16.93 16.93 36247579 NY USO

CORPORATION - Invoice No: 750347013 Paid to: Fedex per Caitlin Garvey Ship To: Judge James L Garrity, Jr Ship Dt: 09/14/21 Airbill: 283658580185 07428 00001 978223: Most cost efficient method of proof of

delivery.

16-11895-jlg Doc 2782 Filed 10/26/21 Entered 10/26/21 16:34:33 Main Document Pg 11 of 11 pf 11 p

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quinn emanuel urguhart & sullivan. llp

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BRUSSELS | SEATTLE | ZURICH | SHANGHAI | STUTTGART | PERTH |
SALT LAKE CITY |

#### **Current Invoice Summary**

Matter Name: In re: CFG Peru Investments Pte. Ltd.

 Matter #: 07428-00001
 Total Fees
 \$36,789.00

 Bill Date: October 26, 2021
 Expenses
 \$261.67

 Invoice Number: 101 Total Due this Invoice
 \$37,050.67

0000125272 Payment Due By November 27, 2021

#### **Current Account Summary**

Date	Invoice No.	Month of Service	Amount Billed	Payments Applied	Outstanding Amount
08/20/21	101-	July 2021	\$4,965.80	\$0.00	\$4,965.80
	0000122145		•		
09/13/21	101-	August 2021	\$611.00	\$0.00	\$611.00
	0000122837				
10/18/21	101-	September 2021	\$25,513.87	\$0.00	\$25,513.87
	0000124861				
10/26/21	101-	September 2021	\$5,960.00	\$0.00	\$5,960.00
	0000125272				

#### Please reference invoice number and send check to:

#### Quinn Emanuel Urquhart & Sullivan, LLP

865 S. Figueroa St., 10th Floor Los Angeles, CA 90017

Or Wire funds City National Bank

<u>to:</u> 555 South Flower St., 12th Floor

Los Angeles, CA 90071

Account Info: Quinn Emanuel Urquhart & Sullivan, LLP

Bank Account: Deposit Account #210032347

Bank ABA No.: 122016066 Swift Code: CINAUS6L

References: Invoice number and client name / matter number please

Tax ID# 95-4004138