

Presentment Date & Time: July 12, 2024 at 12:00 p.m.

Objection Deadline: July 8, 2024 at 11:30 a.m.

HOGAN LOVELLS US LLP

Ronald J. Silverman
390 Madison Avenue
New York, New York 10017
Telephone: (212) 918-3000
Facsimile: (212) 918-3100
Email: ronald.silverman@hoganlovells.com

Attorneys for Madison Pacific Trust Limited

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

In re:

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

Debtors.¹

Chapter 11

Case No. 16-11895 (JLG)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF MOTION TO
WITHDRAW AS ATTORNEY OF RECORD AND REQUEST
TO BE REMOVED FROM ELECTRONIC NOTICE AND SERVICE LIST**

PLEASE TAKE NOTICE that upon the annexed motion (the “Motion”) of Ronald J. Silverman of Hogan Lovells US LLP, and Jonathan Leitch and Derrick Lau of Hogan Lovells International LLP (the “Movants”), pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York, for entry of an order withdrawing as attorneys of record for Madison Pacific Trust Limited (“Madison”) in the jointly administered cases of the above-

¹ 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, SuperbChoice International Limited, Toyama Holdings Limited (BVI) and Pacific Andes Enterprises (Hong Kong) Limited.

referenced debtors (collectively, the “Debtors”), the undersigned will present the attached proposed order to the Honorable James L. Garrity, Jr. at One Bowling Greene, New York, New York 10004, for signature **July 12, 2024 at 12:00 noon** (the “Presentment Date”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing and filed with the Bankruptcy Court in accordance with the Local Rules, and served upon undersigned counsel for the Debtor and upon the United States Trustee, so as to be received no later than **July 8, 2024 at 11:30 a.m.** If no objections are timely filed and served, the Motion may be signed by the Bankruptcy Court without a hearing.

PLEASE TAKE FURTHER NOTICE that if objections are timely filed a hearing may be scheduled before the Honorable James L. Garrity, Jr., Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York, at One Bowling Greene, New York, New York 10004. If a hearing is scheduled the moving party will be obligated to notify all other parties entitled to receive notice of the hearing date and time. The moving and objecting parties are required to attend the hearing, and failure to attend may result in relief being granted or denied upon default.

Dated: June 21, 2024
New York, New York

HOGAN LOVELLS US LLP

/s/ Ronald J. Silverman

Ronald J. Silverman
390 Madison Avenue
New York, New York 10017
Telephone: (212) 918-3000
Facsimile: (212) 918-3100
Email: ronald.silverman@hoganlovells.com

Attorneys for Madison Pacific Trust Limited

HOGAN LOVELLS US LLP

Ronald J. Silverman
390 Madison Avenue
New York, New York 10017
Telephone: (212) 918-3000
Facsimile: (212) 918-3100
Email: ronald.silverman@hoganlovells.com

Attorneys for Madison Pacific Trust Limited

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

In re:

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

Debtors.²

Chapter 11

Case No. 16-11895 (JLG)

(Jointly Administered)

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD AND REQUEST
TO BE REMOVED FROM ELECTRONIC NOTICE AND SERVICE LIST**

Pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York, Ronald J. Silverman of Hogan Lovells US LLP, and Jonathan Leitch and Derrick Lau of Hogan Lovells International LLP (the “Movants”) hereby respectfully move for an order withdrawing as attorneys of record for Madison Pacific Trust Limited (“Madison”) in the jointly administered cases (the “Cases”) of the above-referenced debtors (collectively, the “Debtors”).

² 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, SuperbChoice International Limited, Toyama Holdings Limited (BVI) and Pacific Andes Enterprises (Hong Kong) Limited.

Movants further request that their names be removed from all notice and service lists in this case. In support of this Motion, Movants state as follows.

1. On February 23, 2022, the Court entered an order confirming the *Seventh Amended Chapter 11 Plan of Reorganization of Pacific Andes International Holdings Limited (Bermuda) and Certain of its Affiliated Debtors* (“PAIH Plan”) [ECF No. 2977]. On December 23, 2022, the Debtors filed a notice of the occurrence of the effective date of the PAIH Plan [ECF 3109]. On February 23, 2022, the Court entered an order confirming the *Seventh Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda) and Certain of their Affiliated Debtors* (“CFGL-PARD Plan”) [ECF No. 3108]. On December 23, 2022, the Debtors filed a notice of the occurrence of the effective date of the CFGL-PARD Plan [ECF 3108]. On June 10, 2021 this court entered an order confirming the *Creditor Plan Proponents’ Chapter 11 Plan for CFG Peru Investments Pte. Ltd. (Singapore)* (the “CFG Peru Plan,” and together with the PAIH Plan and the CFGL-PARD Plan, the “Plans”) [ECF No. 2569]. On November 7, 2022, the Debtors filed a notice of the occurrence of the effective date of the CFG Peru Plan [ECF 3093].

2. Given that the Plans have gone effective, Madison’s interest in these Cases has substantially ended. Madison no longer requires the legal representation of the Movants in these Cases. Therefore, the Movants file this motion seeking an order approving their request to withdraw as counsel to Madison in these Cases,

3. The Movants further request that they no longer receive electronic notices from the Court’s CM/ECF system with respect to these Cases.

4. Madison agrees with the relief sought in this Motion.

WHEREFORE, for the reasons set forth herein, Movants respectfully request that the Court grant this Motion and order that Movants are withdrawn as counsel of record for Madison so that Movants no longer receive electronic notices from the Court's CM/ECF system.

Dated: June 21, 2024
New York, New York

HOGAN LOVELLS US LLP

/s/ Ronald J. Silverman

Ronald J. Silverman
390 Madison Avenue
New York, New York 10017
Telephone: (212) 918-3000
Facsimile: (212) 918-3100
Email: ronald.silverman@hoganlovells.com

Attorneys for Madison Pacific Trust Limited

Proposed Order

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

In re:

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

Debtors.¹

Chapter 11

Case No. 16-11895 (JLG)

(Jointly Administered)

Related to Dkt. No. ____

**ORDER GRANTING MOTION TO WITHDRAW AS ATTORNEY OF RECORD AND
REQUEST TO BE REMOVED FROM ELECTRONIC NOTICE AND SERVICE LIST**

Upon the motion (the “Motion”) of Ronald J. Silverman of Hogan Lovells US LLP, and Jonathan Leitch and Derrick Lau of Hogan Lovells International LLP (the “Movants”) for entry of an order withdrawing as attorneys of record for Madison Pacific Trust Limited (“Madison”), and for good cause shown therein, it is hereby

ORDERED that Movants are withdrawn as counsel of record for Madison in the above-referenced jointly administered chapter 11 cases; and it is further

ORDERED that Movants no longer receive electronic notices from the Court’s CM/ECF system in this proceeding.

¹ 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, SuperbChoice International Limited, Toyama Holdings Limited (BVI) and Pacific Andes Enterprises (Hong Kong) Limited.

Dated: New York, NY
_____, 2024

UNITED STATES BANKRUPTCY JUDGE