

United States Bankruptcy Court for the District of Delaware	Your Mail ID is 225558605
Name of Debtor: Terraform Labs Pte. Ltd.	For Court Use Only
Case Number: 24-10070	Claim Number: 0000010163
	File Date: 08/05/2024 10:02:15

Proof of Claim (Official Form 410)

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of 503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

04/22

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim): LAW OFFICE OF GORAN RODIC

Other names the creditor used with the debtor: _____

2. Has this claim been acquired from someone else? No Yes. From whom? _____

3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Name LAW OFFICE OF GORAN RODIC

Address 13TH OF JULY STREET

NO. 6/1

City PODGORICA

State _____ ZIP Code 81000

Country (if International): MONTENEGRO

Phone: +39269320409

Email: advokatrodic@yahoo.com

Where should payments to the creditor be sent? (if different)

Name _____

Address _____

City _____

State _____ ZIP Code _____

Country (if International): _____

Phone: _____

Email: _____

4. Does this claim amend one already filed?

No

Yes.

Claim number on court claims register (if known) _____

Filed on _____

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No

Yes.

Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?

No
 Yes.
 Last 4 digits of the debtor's account or any number you use to identify the debtor:

7. How much is the claim?
 \$ 531,572.36

Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?
 Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.

Other Basis _____
 Invoice 7/24 and 8/24 for legal services

9. Is all or part of the claim secured?
 No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____

Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____
 (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____%
 Fixed Variable

10. Is this claim based on a lease?
 No
 Yes. **Amount necessary to cure any default as of the date of petition.**
 \$ _____

11. Is this claim subject to a right of setoff?
 No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?
 No
 Yes. *Check one:*
 Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).
 Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).
 Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).
 Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).
 Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).
 Other. Specify subsection of 11 U.S.C. § 507 (a) (_____) that applies.

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.
Amount entitled to priority
 \$ _____
 \$ _____
 \$ _____
 \$ _____
 \$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Does this claim qualify as an Administrative Expense under 11 U.S.C. § 503(b)(9)?
 No
 Yes. **Amount that qualifies as an Administrative Expense under 11 U.S.C. § 503(b)(9):** \$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other co-debtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Goran Rodić, attorney at law

08/05/2024 10:02:15

Signature

Date

Provide the name and contact information of the person completing and signing this claim:

Name Goran Rodic

Address 13th of July Street 6/1 81000 Podgorica

City Podgorica

State Zip 81000

Country (in international) Montenegro

Phone +38269320409

Email advokatrodic@yahoo.com

Fill in this information to identify the case or debtor the claim is against:

- Terraform Labs Pte. Ltd. (Case No. 24-10070)
- Terraform Labs Limited (Case No. 24-11481)

To submit your form online please go to <https://eqlworkflow.com/cases/TEF>

LAW OFFICE OF GORAN RODIC
13TH OF JULY STREET
NO. 6/1
PODGORICA 81000
MONTENEGRO

Your Mail ID is as follows: 225558605

Modified Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of claims under 11 U.S.C. § 503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

If your claim is against Terraform Labs Pte. Ltd ("TFL"), fill in all the information about the claim as of January 21, 2024 (i.e., the date of the petition for TFL).

If your claim is against Terraform Labs Limited ("TLL"), fill in all the information about the claim as of July 1, 2024 (i.e., the date of the petition for TLL).

Part 1: Identify the Claim

1. Who is the current creditor? Law office Goran Rodic
Name of the current creditor (the person or entity to be paid for this claim)
Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else? No Yes From whom? _____

3. Where should notices and payments to the creditor be sent? **Where should notices to the creditor be sent?**
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)
Law office Goran Rodic
Name 13th of July Street
Number Street
Podgorica, Montenegro 81000
City State ZIP Code
Contact phone +38269320409
Contact email advokatrodic@yahoo.com

Where should payments to the creditor be sent? (if different)
Name _____
Number Street _____
City State ZIP Code _____
Contact phone _____
Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed? No Yes.
Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim? No Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of: (i) January 21, 2024 if the Claim is against Terraform Labs Pte. Ltd. or (ii) July 1, 2024 if the Claim is against Terraform Labs Limited

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 484 000,00 EUR Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.
Invoice #124 and Invoice #124 for legal representation of Do Hyeon Kwon in extradition proceedings in Montenegro

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____
Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the applicable petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under

No

Yes. Check one:

11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ _____

Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Does this claim qualify as an Administrative Expense under 11 U.S.C. § 503(b)(9)?

No

Yes. Amount that qualifies as an Administrative Expense under 11 U.S.C. § 503(b)(9): \$ _____

Sign Below

Part 3:

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP

5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.

18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 08 05 2024
MM / DD / YYYY

Signature

ADVOKAT
Goran Rodić
ul. 13. jula br. 6/I
81000 PODGORICA
tel/fax: 020 239 177

Print the name of the person who is completing and signing this claim:

Name Goran Bogdjuh Rodic
First name Middle name Last name

Title MR

Company Law office Rodic
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 13th of July Street
Number Street

Rodgorica Montenegro 81000
City State ZIP Code

Contact phone +38269320408 Email advocatrodic@yahoo.com

Law office

RODIĆ

Phone/Fax: +382 20 239 177; e-mail: advokatrodic@yahoo.com; 13th of July Street, No. 6/1,
81000 Podgorica, Montenegro

TERRAFORM LABS PTE LTD

1 WALLICH ST. 37-01

SINGAPORE

&

Dentons US LLP

1900 K Street NW

Washington, DC 20006

INVOICE

7/24


On the basis of Article 6 of the Engagement Agreement, for legal representation of client Kwon Do Hyeong, in criminal and extradition proceedings conducted against him in Montenegro, I'm invoicing you for the monthly fee for July 2024: *EUR 200.000,00, plus 21% VAT (amount of EUR 42.000,00);*

TOTAL AMOUNT OF: EUR 242.000,00.

Please pay the stated amount of EUR 242.000,00 within three days from the date of receipt of this invoice, to an account in the name of Law office Goran Rodić, according to the banking instructions that are an integral part of this invoice.

In Podgorica, 5th of July, 2024.

Goran Rodić, attorney at law


ADVOKAT
Goran Rodić
ul. 13. jula br. 6/1
81000 PODGORICA
tel/fax: 020 239 177

Law office

RODIĆ

Phone/Fax: +382 20 239 177; e-mail: goran@rodic.me; 13th of July Street, No. 6, I,
81000 Podgorica, Montenegro

TERRAFORM LABS PTE LTD

1 WALLICH ST. 37-01

SINGAPORE

&

Dentons US LLP

1900 K Street NW

Washington, DC 20006

INVOICE

8/24

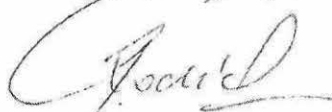
On the basis of Article 6 of the Engagement Agreement, for legal representation of client Kwon Do Hyeong, in criminal and extradition proceedings conducted against him in Montenegro, I'm invoicing you for the monthly fee for August 2024: *EUR 200.000,00, plus 21% VAT (amount of EUR 42.000,00);*

TOTAL AMOUNT OF: EUR 242.000,00.

Please pay the stated amount of EUR 242.000,00 within three days from the date of receipt of this invoice, to an account in the name of Law office Goran Rodić, according to the banking instructions that are an integral part of this invoice.

In Podgorica, 1st of August, 2024.

Goran Rodić, attorney at law


ADVOKAT
Goran Rodić
ul. 13. jula br. 6/I
81000 PODGORICA
tel/fax: 020 239 177

NLB Banka AD Podgorica
Sektor platnih sistema
Odjeljenje platnog prometa

Klasifikacija: Povjerljivo
Datum:

Instrukciju izdao: Tamara Bakic

Kontakt tel.: (00)382-20-402-189

INSTRUCTIONS FOR INFLOW
Nova Ljubljanska Banka /Slovenia

Please effect payment with our standard settlement instructions, as follows:

INTERMEDIARY
(Field 54A or 56A)
Swift code
(name)

██████████
Nova Ljubljanska Banka /Slovenia

ACCOUNT WITH INST.
(Field 57A)

Beneficiary bank

Swift code
Name

██████████
NLB Banka AD Podgorica

BENEFICIARY CUSTOMER
(Field 59)

IBAN CODE: ██████████

NAME: ADVOKATSKA KANCELARIJA GORAN RODIC
Address: 13 jul br 6/I Podgorica

REMITTANCE INFORMATION
(Field 70)