

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

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:
In re: : Chapter 11
:
HO WAN KWOK *et al.*, : Case No. 22-50073 (JAM)
:
Debtors.¹ : Jointly Administered
:
-----X

NOTICE OF FILING:

(I) SUPPLEMENTAL DECLARATION OF JULIE GRACE BURKE IN SUPPORT OF MOTION OF TRUSTEE, PURSUANT TO BANKRUPTCY CODE SECTIONS 327(a), 328, AND 363(b), BANKRUPTCY RULES 2014(a) AND 2016, AND LOCAL RULE 2014-1, FOR ENTRY OF ORDER (I) AUTHORIZING EMPLOYMENT AND RETENTION OF REAL PROPERTY BROKER, EFFECTIVE AS OF AUGUST 23, 2024, FOR SALE OF GREENWICH PROPERTY, (II) AUTHORIZING TRUSTEE TO FUND EXPENSES RELATED TO GREENWICH PROPERTY AND (III) FOR RELATED RELIEF; AND (II) REVISED PROPOSED ORDER GRANTING MOTION

Luc A. Despins, in his capacity as Chapter 11 Trustee (the “Trustee”) for Ho Wan Kwok, hereby files the *Supplemental Declaration of Julie Grace Burke* in support of the *Motion of Trustee, Pursuant to Bankruptcy Code Sections 327(a), 328, and 363(b), Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, for Entry of Order (I) Authorizing Employment and Retention of Real Property Broker, Effective as of August 23, 2024, for Sale of Greenwich Property, (II) Authorizing Trustee to Fund Expenses Related to Greenwich Property and (III) for Related Relief* [ECF No. 3450], appended hereto as **Exhibit A**, and the Trustee’s revised proposed order granting the Motion, appended hereto as **Exhibit B-1** in clean form and as **Exhibit B-2** in redline form reflecting changes to the original appended to and filed with the Motion.

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

Dated: September 2, 2024
New Haven, Connecticut

LUC A. DESPINS, CHAPTER 11 TRUSTEE

By: /s/ Kari A. Mitchell

Kari A. Mitchell (ct31578)
Douglas S. Skalka (ct00616)
Patrick R. Linsey (ct29437)
NEUBERT, PEPE & MONTEITH, P.C.
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New Haven, Connecticut 06510
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and

G. Alexander Bongartz (admitted *pro hac vice*)
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200 Park Avenue
New York, New York 10166
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Nicholas A. Bassett (admitted *pro hac vice*)
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Washington, D.C., 20036
(202) 551-1902
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Counsel for the Chapter 11 Trustee

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

-----X
:
In re: : Chapter 11
:
HO WAN KWOK *et al.*, : Case No. 22-50073 (JAM)
:
Debtors.² : Jointly Administered
:
-----X

**SUPPLEMENTAL DECLARATION OF JULIE GRACE BURKE IN SUPPORT OF
MOTION OF TRUSTEE, PURSUANT TO BANKRUPTCY CODE SECTIONS 327(a),
328, AND 363(b), BANKRUPTCY RULES 2014(a) AND 2016, AND LOCAL RULE 2014-
1, FOR ENTRY OF ORDER (I) AUTHORIZING EMPLOYMENT AND RETENTION
OF REAL PROPERTY BROKER, EFFECTIVE AS OF AUGUST 23, 2024, FOR SALE
OF GREENWICH PROPERTY, (II) AUTHORIZING TRUSTEE TO FUND EXPENSES
RELATED TO GREENWICH PROPERTY AND (III) FOR RELATED RELIEF**

I, Julie Grace Burke, being duly sworn, state the following under penalty of perjury:

1. I am a real estate agent associated with Compass, Inc. (“Compass”), at its office located at 200 Greenwich Avenue, 3rd Floor, Greenwich, Connecticut 06830, and I am the proposed listing agent with respect to the sale of the Taconic Property.

2. I submit this declaration (the “Declaration”) in support of the *Motion of Trustee, Pursuant to Bankruptcy Code Sections 327(a), 328, and 363(b), Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, for Entry of Order (I) Authorizing Employment and Retention of Real Property Broker, Effective as of August 23, 2024, for Sale of Greenwich Property, (II) Authorizing Trustee to Fund Expenses Related to Greenwich Property and (III) for Related Relief* [ECF No. 3450] (the “Motion”)³ in the chapter 11 case (the “Chapter 11 Case”) of Ho

² The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despina, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

³ Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

Wan Kwok (the “Debtor”), seeking an order approving, among other things, the retention of Compass as broker pursuant to sections 327(a) and 328(a) of the Bankruptcy Code. This Declaration supplements my prior declaration appended to the Motion (the “Original Declaration”) and the supplemental declaration of David Haffenreffer filed August 29, 2024 [ECF No. 3484].

3. In connection with the Motion, I have reviewed the list of parties in interest (the “Parties in Interest”), attached hereto as **Schedule 1**, provided by counsel to the Trustee.

4. Several names of financial institutions listed are familiar to me, and, in fact, I have accounts at both Citibank N.A. and Bank of America N.A. Moreover, I am familiar with several Greenwich- and/or Stamford-based law firms, such as Ivey, Barnum & O’Mara LLC and Whitman Breed Abbott & Morgan LLC, which I have interfaced with on various real estate transactions and which may have referred clients to Compass (but have not referred clients to me individually). I have referred clients to some of these firms in the past.

5. Based on my review and personal knowledge, I am not aware of me or Compass having any connections with the Parties in Interest other than as disclosed in this Declaration or as previously disclosed in my Original Declaration. I certainly believe that Compass and I are not conflicted in any way with respect to the marketing and sale of the Taconic Property. To the extent that I become aware of any conflict and/or connections not disclosed to date, I will promptly submit a further supplemental declaration to that effect to the Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 2, 2024

/s/ Julie Grace Burke
Julie Grace Burke
Listing Agent
Compass, Inc.

Schedule 1

PARTIES IN INTEREST

SCHEDULE OF PARTIES IN INTEREST – IN RE KWOK

20 LARGEST UNSECURED CREDITORS

PACIFIC ALLIANCE ASIA OPPORTUNITY
GOLDEN SPRING NEW YORK
RUI MA
CHENG JIAN WU JIAN SHE
NING YE
GUO BAOSHENG
YAN LAN & WU ZHENG
HONG QI QU
NAN TONG SI JIAN
JIAN GONG
YAN ZHAO
YUA HUA ZHUANG SHI
LIEHONG ZHUANG/XIAO YAN ZHU
WEICAN MENG/BOXUN INC.
SAMUEL NUNBERG
LAMP CAPITAL LLC
JUN CHEN AKA JONATHAN HO
YUE HUA ZHU SHI
XIONG XIAN WEI YE
HUIZEN WANG

DEBTOR, FAMILY MEMBERS, AND CERTAIN RELATED ENTITIES

HO WAN KWOK (A.K.A MILES GWOK, MILES GUO AND WENGUI GUO)
HING CH NGOK/YUE QINGZHI
QIANG GUO (A.K.A. MILESON GUO)
MEI GUO/MEI GUI
HK INTERNATIONAL FUNDS INVESTMENTS (USA) LIMITED, LLC
BRAVO LUCK LIMITED
GENEVER HOLDINGS CORPORATION
GENEVER HOLDINGS LLC

BANKRUPTCY JUDGE AND U.S. TRUSTEE PERSONNEL

HONORABLE JULIE A. MANNING
WILLIAM HARRINGTON
KIM L. MCCABE
HOLLEY CLAIBORN
JOSEPH H. FLAMINI
ERIN HOGAN
STEVEN MACKEY
FRANK MARINO

JENNIFER J. MOREY
NICOLE NEELY
SHARON WARNER
JOHN GERVAIS

OTHER INTERESTED PARTIES

1245 FACTORY PLACE, LLC
12476517 CANADA SOCIETY
1322089 B.C. LTD.
1332156 B.C. LTD
17 MILES, LLC
2 B PACKING LLC
270 W. 39TH ST. CO., LLC
2LAWRENCE RIVER
3 COLUMBUS CIRCLE LLC
5780 SAGUARO LLC
7 NOD HILL LLC,
7 STAR EAST NY LLC
9 EAST 40TH STREET LLC
A.Z. BIGIOTTERIE S.A.S. DI ZANUTTO GABRIELE & C.
AAGV LIMITED
AARON A. MITCHELL
AARON A. ROMNEY
ABRAMS FENSTERMAN, LLP
ACA CAPITAL GROUP LIMITED
ACA CAPITAL LIMITED
ACA INVESTMENT FUND
ACA INVESTMENT MANAGEMENT LTD.
ACASS CANADA LTD.
ACE DECADE HOLDINGS LIMITED
ADAM CHEN NI
AFFILIATED ADJUSTMENT GROUP, LTD.
AGORA LAB, INC.
AI GROUP HOLDINGS INC.,
AIG PROPERTY CASUALTY COMPANY
AKERMAN LLP
ALEX HADJICHARALAMBOUS
ALFA GLOBAL VENTURES LIMITED
ALFONSO GLOBAL LIMITED
ALFONSO GLOBAL VENTURES LIMITED
ALLIED CAPITAL GLOBAL LIMITED
ALPINE FIDUCIARIES SA
AMAZING SKY AVIATION LIMITED
AMAZON WEB SERVICES LLC
AMAZON WEB SERVICES, INC.
AMAZON.COM INC.

AMERICAN ARBITRATION ASSOCIATION, INC.
AMERICAN EXPRESS COMPANY
AMY BUCK
AN HONG
ANA C. IZQUIERDO-HENN
ANDREW CHILDE
ANDREW SULNER/FORENSIC DOCUMENT EXAMINATIONS, LLC
ANN MARIE LEE
ANTHEM HEALTH PLANS, INC.
ANTHONY DIBATTISTA
ANTON DEVELOPMENT LIMITED
APPLE INC.
APPSFLYER INC
APSLEY YACHTS LIMITED
ARETHUSA FORSYTH
ARI CASPER
ARRI AMERICAS INC.
ART WOLFE, INC.
ASAP SRL
ASSETS SINO LIMITED
AUSPICIOUS COAST LIMITED
AVIATION E LLP
AVIATION TRUST COMPANY LLC
AXOS BANK
AXOS FINANCIAL, INC.
B&H FOTO & ELECTRONICS CORP.
BAC CAPITAL LLC
BAIQIAO TANG A/K/A TANG BAIQIAO
BAKER HOSTETLER LLP
BANCO POPULAR DE PUERTORICO
BANK OF AMERICA
BANK OF CHINA – NEW YORK BRANCH AND/OR BANK OF CHINA LIMITED
BANK OF MONTREAL
BANK OF THE WEST
BANNON STRATEGIC ADVISORS, INC.
BARCLAY DAMON LLP
BARCLAYS BANK PLC
BEIJING BI HAI GE LIN YUAN LIN LU HUA, LTD.
BEIJING CHENG JIAN WU JIAN SHE GROUP, LTD.
BEIJING FU LE HONG MA JIAN ZHU ZHUANG SHI GONG CHENG, LTD.
BEIJING PANGU INVESTMENT CO.
BEIJING ZENITH HOLDINGS CO.
BEIJING ZHONG XIAN WEI YE STAINLESS DECORATION CENTER
BEILE LI
BELLERIVE ATTORNEYS AT LAW
BENHAR OFFICE INTERIORS LLC

BENTO TECHNOLOGIES, INC.
BERING YACHTS, LLC
BERKELEY ROWE LIMITED
BERNARDO ENRIQUEZ
BESTVIEW1 PTY LTD
BINGNAN CUI
BINGSHANG JIAO
BLACKTHORN FINANCEN INC.
BLUE CAPITAL
BLUEBERRY BUILDERS, LLC
BNY MELLON, N.A.
BOARDWALK MOTOR IMPORTS, LLC
BOHONNON LAW FIRM
BOIES SCHILLER
BONNIE C. MANGAN
BOOMING SAIL NEW YORK LLC
BOXUN INC.
BRANCH
BRAVO LUCK LIMITED
BRENT PETRO INC.
BRIAN HOFMEISTER
BROWN HARRIS STEVENS
BROWN RUDNICK, LLP
BRUNE LAW PC
BSA STRATEGIC FUND
BSA STRATEGIC FUND I
BSI GROUP LLC
BUCK, ESQ. LLC
BURNETTE SHUTT AND MCDANIEL PA
CAHILL GORDON & REINDEL LLP
CAIYAN LING
CAMERON SMEE
CANADIAN IMPERIAL BANK OF COMMERCE
CAPITAL ONE BANK
CAPITAL ONE, NA
CARIBE CONDADO, LLC
CARMODY TORRANCE SANDAK & HENNESSEY LLP
CAYUSE GOVERNMENT SERVICES, LLC
CEDRIC DUPONT ANTIQUES
CELESTIAL TIDE LIMITED
CESARE ATTOLINI NY LLC
CFG GLOBAL LIMITED
CHAO KANG SUN
CHAO-CHIH CHIU
CHARLES SCHWAB
CHARMOY & CHARMOY LLC

CHASE BANK
CHEN XIN XIN
CHENGLONG WANG
CHENXI WANG
CHI WAI KWOK
CHIESA SHAHINIAN & GIAN TOMASI PC
CHINA GOLDEN SPRING GROUP (HONG KONG) LIMITED
CHOICE FINANCIAL BANK
CHONG SHEN RAPHANELLA
CHRIS LEE (A/K/A NAN LI, CHRIS LI, MEI GUO XIAO LI)
CHRISTIE'S INTERNATIONAL REAL ESTATE NEW
CHRISTINE CHEN
CHRISTINE FROSINI
CHRISTODOULOS G. VASSILIADES & CO. LLC
CHUAN LING YANG
CHUANG XIN LTD.
CHUI KUK WU
CHUNFENG XIA
CHUNGUANG HAN
CHUNHUI SONG
CI CHEN
CIBC INC. (D/B/A CIBC)
CINDY ZHANG
CIRRUS DESIGN CORPORATION (D/B/A CIRRUS AIRCRAFT)
CIRRUS INDUSTRIES, INC.
CITIBANK
CITIZENS FINANCIAL GROUP, INC.
CITY NATIONAL BANK
CLARK HILL PLC
CLAYMAN & ROSENBERG LLP
CLAYMAN ROSENBERG KIRSHNER & LINDER LLP
CLOUDFLARE, INC.
COHN BIRNBAUM & SHEA P.C.
COLDWELL BANKER
COLE SCHOTZ P. C.
COMERICA INCORPORATED (D/B/A COMERICA BANK)
COMMUNITY FEDERAL SAVINGS BANK
COMPASS, INC.
CONSERVATIVE CAMPAIGN TECHNOLOGY, LLC
COTTON CRAFT TEXTILES INTL TRADING
COUNSEL PRESS INC.
COWDERY, MURPHY & HEALY, LLC
CRANE ADVISORY GROUP LLC
CREATIVE APEX INVESTMENTS LIMITED
CROCKER MANSION ESTATE LLC
CRYSTAL BREEZE INVESTMENTS LIMITED

CUI ZHU LI
CURIOSITY CORP. LLC
D&D SOLUTIONS LLC
D.P. TEXTILE & APPAREL, INC.
D4ZERO S.R.L.
DAIHO ZHOU
DANIEL PODHASKIE
DANIEL S. ALTER
DANYU LIN
DARK SHADOWS LLC
DAVID FALLON
DAWN STATE LIMITED
DBS BANK LTD.
DEFENG CAO
DELTEC BANK & TRUST LIMITED
DENG LI
DENG QIAN
DEUTSCHE BANK TRUST COMPANY AMERICA
DEUTSCHE HANDELSBANKEN AG
DIME COMMUNITY BANK
DING “IVAN” LIN
DING G. WANG A/K/A DINGGANG WANG
DING QIANG SHEN
DIRECT PERSUASION LLC
DJD CREATIVE LLC
DNM BEAUTY DISTRIBUTION
DOAA DASHOUSH
DONGNA FANG
DREAM PROJECTS LLC
DU JIAN YI
DWF LLP
E.L.J.M. CONSULTING LLC
EAST WEST BANCORP, INC.
EAST WEST BANK
EASTERN PROFIT CORPORATION LIMITED
EDMISTON AND COMPANY LIMITED
EDUARDO EURNEKIAN
EFICENS SYSTEMS LLC
EHSAN MASUD
EISNER ADVISORY GROUP LLC
ELITE WELL GLOBAL LIMITED
ELIXIR TECHNICAL CONSULTING LLC
ELLIOTT KWOK LEVINE & JAROSLAW LLP
EMILE P DE NEREE
EMPIRE BLUE CROSS BLUE SHIELD
EMPIRE GROWTH HOLDINGS

ENGINEERING OPERATIONS AND CERTIFICATION SERVICES, LLC
EPIQ CORPORATE RESTRUCTURING, LLC
ERIC GOLDSMITH MD, LLC
ERNST & YOUNG LLP
EVOLVE BANK AND TRUST
FAM UNITED LLC
FAN BINGBING
FAN JING
FANGGUI ZHU
FANIA ROOFING COMPANY
FARHAD ZABETI
FARRANT GROUP LIMITED
FAY YE
FEDERAL CORPORATION
FEDERAL EXPRESS CORPORATION
FEIFEI MA
FENG PENG RELLOS
FENG YI
FENG ZHU
FENGGUO LI
FENGJIE MA
FFP (BVI) LIMITED
FIESTA INVESTMENT LTD. F/K/A FIESTA PROPERTY DEVEL
FIONA YU
FIRST ABU DHABI BANK
FIRST COUNTY BANK
FIRST REPUBLIC BANK
FIRSTBANK PUERTO RICO
FLAGSTAR BANK, N.A.
FLAT RATE MOVERS, LTD.
FLYING COLOURS CORP
FORBES HARE
FORBES HARE LLP
FORTNUM INFORMATION SECURITY LIMITED
FOX NEWS NETWORK, LLC
FREEDOM MEDIA VENTURES LIMITED
FUNGWAN TRADING INC.
FUNING ZHANG
FUNKY FOUNDATIONS, INC.
FV BANK INTERNATIONAL INC.
G CLUB HOLDCO I LLC
G CLUB INTERNATIONAL LIMITED
G CLUB ONE
G CLUB OPERATIONS LLC
G CLUB THREE
G CLUB TWO

G CLUB US OPERATIONS INC.
G CLUB US OPERATIONS LLC
G CLUBTHREE
G FASHION
G FASHION (CA)
G FASHION HOLD CO A LIMITED
G FASHION HOLD CO B LIMITED
G FASHION INTERNATIONAL LIMITED
G FASHION LLC
G FASHION MEDIA GROUP INC.
G FASHION US OPERATIONS INC.
G LIVE, LLC
G MUSIC LLC
G NEWS LLC,
G TRANSLATORS PTY LTD
G4S SECURITY SYSTEMS (HONG KONG) LTD.
GALAXY LTD
GANFER SHORE LEEDS & ZAUDERER, LLP
GAO BINGCHEN
GBROADCAST, LLC
G-CLUB
G-CLUB INVESTMENTS LIMITED
GCP INVESTMENT ADVISORS SL
G-EDU INC.
GEORGE L. SU
GEORGIOU PAYNE STEWIEN LLP
GETTR USA, INC.
GF IP, LLC
GF ITALY LLC
GFASHION MEDIA GROUP INC.
GFNY INC.
GINNEL ASSOCIATES, INC. (D/B/A GINNEL REAL ESTATE)
GLADYS CHOW
GLENN MELLOR
GLOBAL GROUP LIMITED
GLOBALIST INTERNATIONAL LIMITED
GM 27 LLC
GMUSIC,
GNEWS LLC,
GNEWS MEDIA GROUP INC.
G-NEWS OPERATIONS, LLC
GOLD LEAF CONSULTING LIMITED
GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP
GOLDEN GATE HIMALAYA FARM LLC
GOLDEN SPRING (NEW YORK) LIMITED
GOLDFARB & HUCK ROTH RIOJAS, PLLC

GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP
GONET & CIE SA
GONG JIANFEN
GORDON & REES SCULLY MANSUKHANI LLP
GPOSTS LLC
GPP SRL
GREAT BOWERY INC. D/B/A CAMILLA LOWTHER MANAGEMENT
GREAT LAKES DRONE COMPANY, LLC
GREEN & SKLARZ LLC
GREENBERG TRAURIG, LLP
GREENWICH LAND LLC
GROCYBER, LLC
GS SECURITY SOLUTIONS INC.
G-SERVICE LLC
G-TRANSLATORS PTY LTD
GTV MEDIA GROUP, INC.
GUI LIN GAO
GUO LIJIE
GUO MEDIA
GUO WENOUN
GUO WENPING
GUOFENG WAN
GUY PETRILLO
GWGPNZ LIMITED
GYPSY MEI FOOD SERVICES LLC
GYPSY MEI PRODUCTIONS LLC
H SHAW ENTERPRISES LLC
HAA GROUP PTY LTD.
HAI YAO
HAIDONG
HAIHONG WANG
HAILING SHENG
HAISONG PENG
HAITHAM KHALED
HALLEY CHEN CPA PROFESSIONAL CORPORATION
HAMILTON CAPITAL HOLDING LIMITED
HAMILTON CAPITAL HOLDINGS INC
HAMILTON DIGITAL ASSETS FUND SP
HAMILTON INVESTMENT MANAGEMENT LIMITED
HAMILTON M&A FUND SP
HAMILTON OPPORTUNITY FUND SPC
HAMILTON PE FUND SP
HAN CHUNGUANG
HANCOCK WHITNEY BANK
HANQIANG LIN
HAO HAIDONG

HAO LI
HAO ZHANG
HAORAN HE
HAOYU WANG
HARCUS PARKER LIMITED
HARNEY WESTWOOD AND RIEGELS LP
HAYASHI MEIOU
HAYMAN HONG KONG OPPORTUNITIES ONSHORE FUND LP
HCHK PROPERTY MANAGEMENT INC.
HCHK TECHNOLOGIES INC.
HCHK TECHNOLOGIES, LLC
HE BEI YUE HUA ZHUANG SHI GONG CHENG LTD.
HEAD WIN GROUP LIMITED
HELEN MANIS
HENAN YUDA
HERBERT SMITH FREEHILLS NEW YORK LLP
HERO GRAND LIMITED
HGA PROPERTY MANAGEMENT
HHS CAPITAL INC.
HIBERNIA NATIONAL BANK
HIDETOSHI FUJIWARA
HILTON MANAGEMENT, LLC
HIMALAYA AUSTRALIA ATHENA FARM INC.
HIMALAYA AUSTRALIA PTY LTD.
HIMALAYA BOSTON MAYFLOWER LLC
HIMALAYA CURRENCY CLEARING PTY LTD.
HIMALAYA EMBASSY
HIMALAYA EXCHANGE
HIMALAYA FEDERAL RESERVE
HIMALAYA INTERNATIONAL CLEARING LIMITED
HIMALAYA INTERNATIONAL FINANCIAL GROUP LIMITED
HIMALAYA INTERNATIONAL PAYMENTS LIMITED
HIMALAYA INTERNATIONAL RESERVES LIMITED
HIMALAYA INVESTMENT LLC
HIMALAYA NEW WORLD INC.
HIMALAYA NEW YORK ROCK
HIMALAYA SHANGHAI FARM LLC
HIMALAYA SUPERVISORY ORGANIZATION
HIMALAYA UK CLUB
HIMALAYA VENTURES LLC
HIMALAYA WORLDWIDE LS
HINCKLEY, ALLEN
HING CHI NGOK
HIU LAAM HAAM
HIU SING CHAN
HML VANCOUVER SAILING FARM LTD.

HODGSON RUSS
HOGAN LOVELLS INTERNATIONAL LLP
HOLY CITY HONG KONG VENTURES, LTD.
HONG KONG INTERNATIONAL FUNDS INVESTMENTS LIMITED
HONG QI QU JIAN SHE GROUP, LTD.
HONG QIU
HONG ZENG
HONGWEI FU
HONGXIA XU
HONGXIN ASH
HOU YUAN CHAN
HOUSER & ALLISON, APC
HOUSTON LITSTAR LLC
HSBC BANK USA,
HSIN SHIH YU
HUA AN XIE
HUANG YAO
HUDSON DIAMOND HOLDING INC.
HUDSON DIAMOND HOLDING LLC
HUDSON DIAMOND LLC
HUDSON DIAMOND NY LLC
HUGGA LLC
HUI JIN
HUK TRADING INC.
ICE24 SRO
IHOTRY LTD
IMMOBILIARA BARBARA 2000 SRL
IMPERIUS INTL. TRADE CO. LTD.
INDIUM SOFTWARE INC.
INFINITE INCREASE LIMITED
INFINITUM DEVELOPMENTS LIMITED
INFINITY TREASURY MANAGEMENT INC.
INSIGHT CAPITAL
INSIGHT PHOENIX FUND
INSIGHT TITLE SERVICES LLC
INTERNATIONAL TREASURE GROUP LLC
INVESTORS BANK
ISRAEL DISCOUNT BANK OF NEW YORK
IVEY, BARNUM & O'MARA LLC
IVY CAPITAL ADVISOR LIMITED
J TAN JEWELRY DESIGN, INC.
JACK S. LIPSON
JAMES PIZZARUSO
JAMESTOWN ASSOCIATES, LLC
JANCO SRL
JANOVER LLC

JAPAN HIMALAYA LEAGUE, INC.
JASON MILLER
JDM STAFFING CORP.
JENNER & BLOCK LLP
JENNIFER FANGFANG DING
JENNIFER MERCURIO
JENNY LI
JERSEY, INC.
JESSE BROWN
JESSICA MASTROGIOVANNI
JETLAW LLC
JIA LI WANG
JIA YANG
JIA YANG LI
JIAHUI LIU
JIALIN QIN
JIAMEI LU
JIAMING LIU
JIAN FAN
JIAN HUA ZHANG
JIAN ZHONG HU
JIANG SU PROVINCE JIAN GONG GROUP LTD BEIJING BRANCH
JIANG YUNFU BE
JIANHAI JIAO
JIANHU YI
JIANHUA ZHENG
JIANMIN HE
JIANSHENGXIE AND JIEFU ZHENG
JIANXIAO CHEN
JIAYAO G
JIE ZHANG
JINFENG WU
JING GENG
JING WU
JINLAN YAN
JIRONG ZHANG
JK CHEF COLLECTIONS LLC
JM BULLION INC.
JNFX LTD.
JOHN B. BERRYHILL
JOHN P. MORGAN
JOHN S LAU
JONATHAN YOUNG
JOSEPH CHEN
JOSHUA I. SHERMAN
JOVIAL CENTURY INTERNATIONAL LIMITED

JOYORD SPORTSWEAR LIMITED
JPMORGAN CHASE BANK, N.A.
JUMBO CENTURY LIMITED
JUN CHEN
JUN LIU
JUN QIAO
JUN YUN ZHANG
JUNE SHI
JUNJIE JIANG
K LEGACY LTD.
KAEN LIU
KAIXIN HONG
KALIXUN TRADING LIMITED
KAMEL DEBECHE
KAN CHAN
KARIN MAISTRELLO
KATHLEEN SLOANE
KEARNY BANK
KERCSMAR FELTUS & COLLINS PLLC
KEYI ZIKLIE
KHALED ASHAFY
KIM THONG LEE
KIN MING JE
KIN MING JE/WILLIAM JE
KROLL, LLC
KUI CHENG
KYLE BASS
KYRGYZ-SWISS BANK CJSC
LA INTERNATIONAL FOUNDATION
LABARBIERA CUSTOM HOMES
LAI LAU
LALIVE SA
LAMP CAPITAL LLC
LAN GU
LAN LIN
LAO JIANG
LAW FIRM OF CALLARI PARTNERS, LLC
LAW OFFICE OF RICHARD E. SIGNORELLI
LAWALL & MITCHELL, LLC
LAX & NEVILLE LLP
LAZARE POTTER GIACOVAS & MOYLE
LEADING SHINE LIMITED
LEADING SHINE NY LTD
LEE CHU
LEE VARTAN
LEEWAYHERTZ TECHNOLOGIES

LEGENDS OWO, LLC
LEICESTER HILL INFROMATICES LLC
LEONARD SCUDDER
LEXINGTON PROPERTY AND STAFFING INC.
LI LIU
LI LONG
LI SHO YO
LI TANG
LI ZHANG
LIANG LIU
LIANYING SU
LIAPULL S.R.L.
LIBERTY JET MANAGEMENT CORP.
LIEHONG ZHUANG
LIHONG “SARA” WEI LAFRENZ
LIHONG WEI LAFRENZ (AKA SARA WEI)
LIMARIE REYES
LIMARIE REYES MOLINARIS
LIN DANG
LIN XIN
LINDA HE CHEUNG
LINWAN “IRENE” FENG
LIU DONGFANG
LLC STZ FUND NO. 1
LOBEL MODERN NYC
LOGAN CHENG (F/K/A SHUIYAN CHENG)
LONG GATE LIMITED
LORO PIANA S.P.A.
LUMINESCENCE CO. LTD
LUXURY CLEANING, INC.
LYZON ENTERPRISES CORPORATION
M&T BANK
MA XINGCHAO
MACARON LIMITED
MACDONALD
MAJOR LEAD INTERNATIONAL LIMITED
MANDELLI USA, INC.
MANHATTAN MOTORCARS, INC.
MANUEL MARTINEZ ANZALDUA
MANUFACTURERS AND TRADERS TRUST COMPANY
MAR-A-LAGO
MAR-A-LAGO CLUB LLC
MARCELLA MONICA FALCIANI
MARCUM LLP
MARINI PIETRANTONI MUNIZ LLC
MARK GUNDERSON

MARTHA JEFFERY
MARY DOWDLE (A/K/A MUFFIN DOWDLE)
MARY FASHION S.P.A.
MARY JIANG
MAUNAKAI CAPITAL
MAX FEI
MAX KRASNER
MAYWIND TRADING LLC
MCDONNELL & WHITAKER LLC
MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
MCMANIMON, SCOTLAND & BAUMANN, LLC
MEDICAL SUPPLY SYSTEM INTERNATIONAL LLC
MEDICI BANK INTERNATIONAL LLC
MEI KUEN KWOK
MEIEN KIKUCHI
MEISTER SEELIG & FEIN PLLC
MELISSA FRANCIS
MELISSA MENDEZ
MENGYAO HE
MERCANTILE BANK INTERNATIONAL CORP.
MERCANTILE GLOBAL HOLDINGS, INC.
MERCEDES-BENZ MANHATTAN, INC.
META PLATFORMS INC.
METROPOLITAN COMMERCIAL BANK AND/OR METROPOLITAN BANK HOLDING
CORP.
MF19 INC.
MI KYUNG YANG
MICHAEL LI & CO.
MICHAEL S. WEINSTEIN
MIHO NISHIMURA
MILES GUO
MILES GWOK
MILLER MOTORCARS INC.
MIMAI NZ LIMITED
MIN YANG
MINDY WECHSLER
MING NI
MING WU
MINGHUA ZHANG
MINGRUI ZHAO
MISHCON DE REYA LLP
MOA-FU
MODSQUAD INC.
MORAN YACHT MANAGEMENT, INC.
MORGAN STANLEY
MORITT HOCK & HAMROFF

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.
MORVILLO ABRAMOWITZ GRAND IASON & ANELLO PC
MOS HIMALAYA FOUNDATION INC.
MOSAICON SHOES SRL
MOUNTAINS OF SPICES INC.
MURTHA CULLINA LLP
MZC FINANCIAL INC.
N.A.R. ENTERPRISES INC.
N87 INC.
NADEEM AKBAR
NAME CORP LLC
NARDELLO & CO., LLC
NATIONAL AUSTRALIA BANK LIMITED
NATIONAL SWEEPSTAKES COMPANY, LLC
NAV CONSULTING INC.
NAV FUND SERVICES (CAYMAN) LTD.
NEALON LAW LLC
NEW DYNAMIC DEVELOPMENT LIMITED
NEW FEDERAL STATE OF CHINA
NEW MULBERRY PTE LTD.
NEW TREASURE LLC
NEW YORK MOS HIMALAYA LLC
NEXBANK
NEXT TYCOON INVESTMENTS LIMITED
NICHOLAS F. SAVIO
NING LI
NING ZHAO
NIUM, INC.
NOBLE FAME GLOBAL LIMITED
NODAL PARTNERS, LLC
NOVELTY HILL LTD.
NRT NEW ENGLAND LLC (D/B/A COLDWELL BANKER RESIDENTIAL BROKERAGE)
NUOXI LIU
NYC DEPT OF FINANCE
O.S.C. ORBIT II SERVICE COMPANY LLC
O.S.C. ORBIT SERVICE COMPANY LLC
O'MELVENY & MYERS LLP
O'NEAL WEBSTER
OASIS TECH LIMITED
OCORIAN CONSULTING LTD
OGIER
OHTZAR SHLOMO SOLOMON TREASURE LLC
OLINA CLEMENS
OLSHAN FROME WOLOSKY LLP
OMICRON NUTRACEUTICAL LLC
ON THE SPOT HOME IMPROVEMENT, INC.

OPEN BANK
ORIENTAL BANK
ORO MONT ALPI SRL
OSC ORBIT SERVICE COMPANY LLC
O'SULLIVAN MCCORMACK JENSEN & BLISS PC
OXFORD VISIONARY LTD.
PACIFIC ALLIANCE ASIA OPPORTUNITY FUND L.P.
PAK SIU LEUNG
PALLAS PARTNER LLP
PARRETT PORTO PARESE & COLWELL, P.C.
PASTORE LLC
PAUL WEISS
PEILUN HU
PEIRU LUO
PELLETTIERI DI PARMA SRL
PENGCHENG ZHANG
PETRILLO KLEIN & BOXER LLP
PHAROS CAPITAL LTD.
PHILLIPS NIZER LLP
PHOENIX CREW IC LIMITED
PICK & ZABICKI LLP
PILLSBURY WINTHROP SHAW PITTMAN LLP
PIXSHOW FILM INC.
PNC BANK
POST OAK MOTOR CARS LLC
POST OAK MOTORS, LLC
PRAGER DREIFUSS AG
PREMIERE ACCOUNTING SOLUTIONS LTD
PRIME TRUST LLC
PROMEMORIA USA INC.
PROMINENT PROPERTIES SOTHEBY'S
PULLMAN & COMLEY, LLC
PUTNAM'S LANDSCAPING LLC
QI YONG
QIANG CHENG
QIANG FU
QIANG GUO
QIANG HU
QIDONG XIA
QIN YU
QING "SERENA" CAI
QINGTIAN YUAN
QIONG BIN FU
QIONGGUI YAN
QIQHUA FAN
QIU YU

QIURIA LI
QU GUOJIAO
QUICK-EQUIP LLC
QUIJU JIA
QUINONES LAW PLLC
RAICH ENDE MALTER CO. LLP (AKA RAICH ENDE MALTER & COMPANY)
RANDAZZA LEGAL GROUP, PLLC
RBB BANCORP AND/OR ROYAL BUSINESS BANK
REACH MANUFACTURING, LLC
RED TEAM PARTNERS
REDFIN CORPORATION
REDIS LAB, INC.
REID AND RIEGE PC
REINHARD PLANK S.R.L.
RENFENG SHI
RESTORATION HARDWARE, INC
REVERENCE CAPITAL PARTNERS OPPORTUNITIES FUND I
RICHARD N. FREETH
RICHMOND STRATEGIC ADVISORS, LLC
RIDWAN MAMODE SAIB
RILIEVI GROUP S.R.L.
RISING SUN CAPITAL LTD.
RIVER VALLEY OPERATIONS LLC
RM AUCTIONS DEUTSCHLAND GMBH
ROADWAY MOVING AND STORAGE, INC. AND/OR ROADWAY MOVING INC.
ROBINSON & COLE LLP
ROGER SMEE
RONG HU
RONG JIANG
RONG ZHANG
RONGLIANG STARKS
RONGRONG LI
ROSCALITAR2
ROSS HEINEMEYER
ROSY ACME VENTURES LIMITED
ROY D. SIMON
RUI HAO
RUIZHENG AN
RULE OF LAW FOUNDATION III INC.
RULE OF LAW SOCIETY IV INC
RUQUIN WANG
RV RETAILER EAST, LLC
RYAN CHENGRAN ZHANG
SAIL VICTORY LIMITED
SAMUEL DAN NUNBERG
SANTANDER BANK, N. A.

SARA WEI (A/K/A LIHONG WEI LAFRENZ)
SARACA MEDIA GROUP INC.
SAVIO LAW LLC
SAXE DOERNBERGER & VITA, P.C.
SCARABAEUS WEALTH MANAGEMENT AG
SCHULMAN BHATTACHARYA, LLC
SCOTT BARNETT
SEACOAST NATIONAL BANK
SEDGWICK REALTY CORP.
SELAS MONTBRIAL AVOCATS
SEVEN MISSION GROUP LLC
SGB PACKAGING GROUP, INC.
SHALOM B. LLC D/B/A ASHER FABRIC CONCEPTS
SHALYEN MUSIC LLC
SHANE D SHOOK
SHAO HONG CHIU
SHAOBING LI
SHAPIRO ARATO BACH LLP
SHAPIRO, DORRY, & MASTERSON LLC
SHENGJIE FU
SHERRY-LEHMANN, INC
SHERRY-NETHERLAND, INC.
SHI JIA ZHUANG ZHEN YUAN JIAN ZHU AN ZHUANG GONG CHENG LTD BEIJING
FIRST
SHIBIN ZHANG
SHIN HSIN YU
SHING SEUNG ANKERITE ENGINEERING LTD
SHINY ACE INNOVATION CO LTD
SHINY ACE LIMITED
SHINY TIMES LTD.
SHIPMAN AND GOODWIN
SHIPMAN, SHAIKEN & SCHWEFEL, LLC
SHIQI WANG
SHIYING LI
SHIYUAN ZHANG
SHIZHONG ZHANG
SHUANG WANG
SHUJUAN MILNE
SHUNJUN LI
SIDLEY AUSTIN LLP
SIGNATURE BANK, N.A.
SILVERGATE BANK
SING TING RONG
SIRIUS NETWORKING INC.
SIU MING JE
SLAUGHTER LAW GROUP, PC

SMARAGDOS MAMZERIS
SOD STONE OFFROAD DESIGN GMBH
SOLAZZO CALZATURE S.R.L.
SOLOMON TREASURE ANTIQUES
SONGYI CHEN
SOTHEBY'S INTERNATIONAL REALTY
SOTHEBY'S INTERNATIONAL REALTY AFFILIATES LLC
SPIRIT CHARTER INVESTMENT LIMITED
SPOTIFY TECHNOLOGY S.A.
SPOTIFY USA, INC.
STANDARD CHARTERED BANK
STANDARD CHARTERED BANK USA
STAPLES, DBA, STAPLES BUILDING SOLUTIONS
STARLING BANK LTD
STEPHEN KINDSETH
STEPHEN WONG
STEPTOE LLP
STERLING NATIONAL BANK
STEVE BANNON,
STEVENSON WONG
STICHTING DUURZAME
STOKES LAWRENCE, PS
STOKESBURY, SHIPMAN & FINGOLD, LLC
STRATEGIC VISION LLC
STROOCK & STROOCK & LAVAN LLP
STRUCTURE DESIGN BUILD LLC
STUDIO CATALDI GROUP SRL
STYLE EYES INC. D/B/A GINGER FINDS
SUPER STAR PROJECT LIMITEDO
SUPREME EBANQ GLOBAL LTD.
SUPREME FINTECH U.S. LLC
SUPREME SG PTE LTD
SWANS TEAM DESIGN INC.
TAIXIN FU
TAKAHASHI HIROYUKI
TALHA ZOBAIR
TAO AN
TAO ZHANG
TAO ZHENG
TARGET ENTERPRISES, LLC
TARTER KRINSKY DROGIN, LLP
TAURUS FUND LLC
TAURUS MANAGEMENT LLC
TAVARES CUTTING INC.
TD AVENUE (THE DIAMOND AVENUE)
TD BANK, N.A.

TELI CHEN
TERIS-PHOENIX, LLC
THE BANCORP BANK
THE BANK OF PRINCETON
THE CASPER FIRM
THE CLEAR CREEK GROUP, LLC
THE CURRENCY CLOUD LIMITED
THE DEPUTY GROUP, LLC
THE FIRST BANK OF GREENWICH
THE FRANCIS FIRM PLLC
THE GERTZ FILE INVESTIGATIVE REPORTING PROJECT INC
THE LAW OFFICES OF RAFAEL A. VARGAS
THE LOST DRAFT LLC
THE QUINLAN LAW FIRM, LLC
THE SHERRY-NETHERLAND HOTEL
THE SHERRY-NETHERLAND, INC.
THERIAULT LAW, P.C.
THOMAS RAGLAND
THREE TREASURE LLC
TIAN LIANG
TIAN SHU HUANG
TINGYI WEI
TM PRIMROSE LIMITED
TOKYOSEIKI CO. LTD.
TONG LE INTERNATIONAL TRADING CO., LTD.
TOP CALIFORNIA BEACH CORP.
TOP TARGET GENERAL TRADING LLC
TRASCO BREMEN GMBH
TRIPLE2 DIGITAL LLC
TROUTMAN PEPPER HAMILTON SANDERS LLP
TROY LAW PLLC
TROY LEGAL, PLLC
TRUSTCO BANK
TT RESOURCES 1 PTY LTD.
TUT CO. LIMITED
U.S. BANK NATIONAL ASSOCIATION
U.S. LEGAL SUPPORT, INC.
UBS AG
UBS AG (LONDON BRANCH)
UK HIMALAYA LTD.
UK IMPORT SERVICES LIMITED
UNA MANYEE WILKINSON
UNITED STATES OF AMERICA
UNITEDLEX
UPDIKE, KELLY & SPELLACY P.C.
URBAN LEGEND MEDIA, INC

US HIMALAYA CAPITAL INC.
US HIMALAYA LTD.
V.X. CERDA & ASSOCIATES P.A.
VALLEY NATIONAL BANK
VANDENLOOM INC.
VERDOLINO & LOWEY
VERITEXT
VERSACE USA, INC.
VFT SOLUTIONS INC.
VICTOR CERDA
VICTOR-OASIS CONSULTANCY LIMITED
VISION KNIGHT CAPITAL (CHINA) FUND
VOICE OF GUO MEDIA, INC.
VX CERDA & ASSOCIATES
WA & HF LLC
WALLEX DIGITAL LLC
WALLEX PAY LLC
WALLEX TECHNOLOGIES PTE LTD.
WANCI JIAO
WANG'S REALTY MANAGEMEMT SERVICE INC.
WARD & BERRY, PLLC
WARREN LAW GROUP
WARROOM BROADCASTING & MEDIA COMMUNICATIONS LLC
WAYCAP S.P.A.
WEATHERTEST COMPANY INC.
WEBSTER FINANCIAL CORPORATION
WEDDLE LAW PPLC
WEDLAKE BELL LLP
WEI HONG XIE
WEI SHE
WEI ZHANG
WEICAN ("WATSON") MENG
WEIGUO SUN
WEIHUA LI
WEIWEI QIAN
WEIXIANG GE
WEIYI WANG
WELL ORIGIN LTD.
WELLS FARGO BANK, N.A.
WEN LIN
WENCONG WANG
WENFENG HU
WENG
WENHUA GONG
WESTY'S STORAGE
WHITECROFT SHORE LIMITED

WHITMAN BREED ABBOTT & MORGAN LLC
WILDES & WEINBERG, P.C.
WILLIAM BRADLEY WENDEL
WILLIAM GERTZ
WILLIAM JE (JE KIN MING)
WILLIAMS & CONNOLLY
WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP
WINGS INSURANCE AGENCY, INC.
WISE CREATION INTERNATIONAL LIMITED
WISE US, INC.
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
WOMBLE BOND DICKINSON (US) LLP
WORLD CENTURY LIMITED,
WORLDWIDE OPPORTUNITY HOLDINGS LIMITED
WU ZHENG
XIA CHUNFENG
XIANHONG ZHANG
XIAO HUANG
XIAO RUI WANG
XIAO YAN ZHU
XIAOBO. HE
XIAODAN WANG
XIAOLAN ZHAO
XIAOLI MA
XIAOLI XU
XIAOMEI ZHAO
XIAOMING LIU
XIAOXIAO LIN
XIAOYAN BA
XILI ZHAI
XIN LI
XINGYU YAN
XINHUI LIAO
XINRONG LI
XIQI ("BOB") FU
XIULING TANG
XUE WANG
XUEBING WANG
XUEHAI LIU
XUN DENG
YA LI
YACHTZOO SARL
YAFAN CHANG
YAN CHUN LIU
YAN GAO
YAN HUANG

YAN LIU
YANCHENG CHEN
YANG HAI
YANG JUN ZHENG
YANG LAN
YANG YANG
YANGPING WANG
YANKWITT LLP
YANMING WANG
YANPING WANG
YANPING YVETTE WANG
YANYUN REN
YAPING ZHANG
YAZ QINGUA
YELIANG XIA
YI LI
YI LIN
YI WEN
YI ZHAO
YI ZHOU
YIELDESTA L.P.
YIMING ZHANG
YING LIU
YINYING WANG (A/K/A XIAO FEI XIANG)
YONG CHUN LI
YONG ZHANG
YONGBING ZHANG
YONGPING YAN (A/K/A SHAN MU)
YOSSI ALMANI
YOUTUBE, LLC
YU XIA LI
YUAN ZHOU
YUANLIN LIU
YUE HUA ZHU SHI
YUE ZHOU
YUECHEN LAN
YUHONG PEI
YUJIA WANG
YUK MOEY MARY YAP
YUKY YUN LIU
YULIN YAO
YUMEI HU
YUNFA WANG
YUNFU JIANG
YUNTENG LU
YUNXIA WU

YUQIANG QIN
YUXIANG CHEN & JIA YOU JT TEN
YVETTE WANG
ZEICHNER ELLMAN & KRAUSE LLP
ZEISLER & ZEISLER, P.C.
ZETA GLOBAL CORP.
ZHANG LIN
ZHANG WEI
ZHENG RUI HE
ZHENG WU (A/K/A BRUNO WA)
ZENGHUA SHEN
ZHENGJUN DONG
ZHENPENG LI
ZHIXUAM LI
ZHIXUAN LI
ZHIZHE “FRANK” DONG
ZHONGYI MA
ZHOU BAOJIN
ZHOU HAI YANG
ZHUOER “JOE” WANG
ZI YE
ZIBA LIMITED
ZIHAN LIU
ZIKUN WANG

EXHIBIT B-1

[REVISED PROPOSED] ORDER (CLEAN)

**DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

-----	X	
	:	
In re:	:	Chapter 11
	:	
HO WAN KWOK <i>et al.</i> ,	:	Case No. 22-50073 (JAM)
	:	
Debtors. ⁴	:	Jointly Administered
	:	
-----	X	

**[REVISED PROPOSED] ORDER, PURSUANT TO BANKRUPTCY CODE SECTIONS
327(a), 328, AND 363(b), BANKRUPTCY RULES 2014(a) AND 2016, AND LOCAL
RULE 2014-1, FOR ENTRY OF ORDER (I) AUTHORIZING EMPLOYMENT AND
RETENTION OF REAL PROPERTY BROKER, EFFECTIVE AS OF AUGUST 23, 2024,
FOR SALE OF GREENWICH PROPERTY, (II) AUTHORIZING TRUSTEE TO FUND
EXPENSES RELATED TO GREENWICH PROPERTY AND
(III) FOR RELATED RELIEF**

Upon the motion (the “Motion”),⁵ filed Luc Despins, in his capacity as the chapter 11 trustee (the “Trustee”) appointed in the chapter 11 case of Ho Wan Kwok (the “Debtor”), pursuant to sections 327(a), 328(a) and 363(b) of title 11 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rule 2014-1, for entry of an order (the “Order”) authorizing the Trustee (i) to employ and retain Compass, Inc. (the “Broker”) as broker to market and sell the property, in accordance with the terms and conditions set forth in the Agreement, and (ii) to fund the reasonable and necessary expenses related to the real property at 373 Taconic Road, Greenwich, Connecticut (inclusive of all improvements and personal property thereon, the

⁴ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

⁵ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

“Greenwich Property”), including, without limitation, payment of the utilities, insurance, any real estate taxes owing with respect to the property, and any cleaning, staging or other expenses necessary to prepare the property to be sold (collectively, the “Greenwich Expenses”), up to the maximum amount of three hundred and fifty thousand dollars (\$350,000) (the “Expenses Cap”), all as further detailed in the Motion; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the District of Connecticut; and it appearing that venue of this chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) on which the Court may enter a final order consistent with Article III of the United States Constitution; and this Court being satisfied based on the representations made in the Motion and in the Burke Declaration that, as more fully disclosed in the Burke Declaration, (a) the Broker does not hold or represent an interest adverse to the Debtors’ estates and (b) the Broker is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code as modified by section 1107(b) of the Bankruptcy Code, and as required by section 327(a) of the Bankruptcy Code; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is approved as set forth herein. All objections to the relief requested in the Motion, whether filed or not, are hereby overruled.

2. The Trustee is authorized to retain and employ the Broker as broker in connection with the sale of the Greenwich Property, on the terms set forth in the Agreement, subject to the terms of this Order.

3. The Broker shall be entitled to a fee of 4.5 percent of the sale price of the Greenwich Property (to be shared 50-50 with the broker for the purchaser), *provided, however*, notwithstanding anything in the Agreement to the contrary, if the Listing Agent brings the purchaser of the Greenwich Property or if the purchaser is not represented by a broker, the Broker's fee shall be reduced to 3 percent of the sale price of the Greenwich Property, *provided, further*, the Broker shall not be entitled to this fee unless the sale of the Greenwich Property is consummated (the "Broker's Fee"). The Broker's Fee and the payment by the Trustee of \$11,000 directly to the staging company for the virtual staging of the Greenwich Property (the "Staging Fee") are hereby approved.

4. The Trustee and the Broker shall not be required to file monthly, interim, or final fee applications pursuant to sections 330 and 331 of the Bankruptcy Code. However, the Trustee shall seek authority to make payment to the Broker's Fee calculated in accordance with the Agreement as modified by this Order as part of the Trustee's motion to approve any sale of the Greenwich Property, *provided, however*, the Trustee may pay the Staging Fee directly to the staging company immediately upon entry of this Order. The Broker shall be compensated for its services solely in accordance with the procedures set forth in this Order and any such other procedures as may be fixed by order of this Court.

5. The Trustee may use property of the Estate to fund the Greenwich Expenses up to the amount of the Expenses Cap.

6. The Expenses Cap shall be subject to increase upon a motion filed by the Trustee with notice to (a) Hing Chi Ngok, (b) Greenwich Land, LLC, (c) the Debtor, (d) the Official Committee of Unsecured Creditors, (e) the United States Trustee, and (f) all parties appearing in the Chapter 11 Case eligible to receive electronic notice, which motion shall be heard upon seven days' notice subject to the schedule of the Court.

7. The Broker has agreed that, notwithstanding anything to the contrary contained in the Agreement, the Seller/Trustee reserves the right to refuse any and all offers, including offers listed at or above the listed price. As such, the certain liens rights pursuant to Conn. Gen. Stat. Ann. Section 20-325a do not apply to the Agreement.

8. To the extent the Motion or the Agreement is inconsistent with this Order, the terms of this Order shall govern.

9. The Trustee and the Broker are authorized and empowered to take all actions necessary to effectuate the relief granted in this Order.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B-2

[REVISED PROPOSED] ORDER (REDLINE)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

-----X
:
In re: : Chapter 11
:
HO WAN KWOK *et al.*, : Case No. 22-50073 (JAM)
:
Debtors.¹ : Jointly Administered
:
-----X

**[REVISED PROPOSED] ORDER, PURSUANT TO BANKRUPTCY CODE SECTIONS
327(a), 328, AND 363(b), BANKRUPTCY RULES 2014(a) AND 2016, AND LOCAL
RULE 2014-1, FOR ENTRY OF ORDER (I) AUTHORIZING EMPLOYMENT AND
RETENTION OF REAL PROPERTY BROKER, EFFECTIVE AS OF AUGUST 23, 2024,
FOR SALE OF GREENWICH PROPERTY, (II) AUTHORIZING TRUSTEE TO FUND
EXPENSES RELATED TO GREENWICH PROPERTY AND
(III) FOR RELATED RELIEF**

Upon the motion (the “Motion”),² filed Luc Despins, in his capacity as the chapter 11 trustee (the “Trustee”) appointed in the chapter 11 case of Ho Wan Kwok (the “Debtor”), pursuant to sections 327(a), 328(a) and 363(b) of title 11 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rule 2014-1, for entry of an order (the “Order”) authorizing the Trustee (i) to employ and retain Compass, Inc. (the “Broker”) as broker to market and sell the property, in accordance with the terms and conditions set forth in the Agreement, and (ii) to fund the reasonable and necessary expenses related to the real property at 373 Taconic Road, Greenwich, Connecticut (inclusive of all improvements and personal property thereon, the

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

“Greenwich Property”), including, without limitation, payment of the utilities, insurance, any real estate taxes owing with respect to the property, and any cleaning, staging or other expenses necessary to prepare the property to be sold (collectively, the “Greenwich Expenses”), up to the maximum amount of three hundred and fifty thousand dollars (\$350,000) (the “Expenses Cap”), all as further detailed in the Motion; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the District of Connecticut; and it appearing that venue of this chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) on which the Court may enter a final order consistent with Article III of the United States Constitution; and this Court being satisfied based on the representations made in the Motion and in the Burke Declaration that, as more fully disclosed in the Burke Declaration, (a) the Broker does not hold or represent an interest adverse to the Debtors’ estates and (b) the Broker is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code as modified by section 1107(b) of the Bankruptcy Code, and as required by section 327(a) of the Bankruptcy Code; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is approved as set forth herein. All objections to the relief requested in the Motion, whether filed or not, are hereby overruled.

2. The Trustee is authorized to retain and employ the Broker as broker in connection with the sale of the Greenwich Property, on the terms set forth in the Agreement, subject to the terms of this Order.

3. The Broker shall be entitled to a fee of 4.5 percent of the sale price of the Greenwich Property, (to be shared 50-50 with the broker for the purchaser), *provided, however*, notwithstanding anything in the Agreement to the contrary, if the Listing Agent brings the purchaser of the Greenwich Property or if the purchaser is not represented by a broker, the Broker's fee shall be reduced to 3 percent of the sale price of the Greenwich Property, *provided, further*, the Broker shall not be entitled to this fee unless the sale of the Greenwich Property is consummated (the "Broker's Fee"). The Broker's Fee and the payment by the Trustee of \$11,000 directly to the staging company for the virtual staging of the Greenwich Property (the "Staging Fee") are hereby approved.

4. The Trustee and the Broker shall not be required to file monthly, interim, or final fee applications pursuant to sections 330 and 331 of the Bankruptcy Code. However, the Trustee shall seek authority to make payment to the Broker's Fee calculated in accordance with the Agreement as modified by this Order as part of the Trustee's motion to approve any sale of the Greenwich Property, *provided, however*, the Trustee may pay the Staging Fee directly to the staging company immediately upon entry of this Order. The Broker shall be compensated for its services solely in accordance with the procedures set forth in this Order and any such other procedures as may be fixed by order of this Court.

5. The Trustee may use property of the Estate to fund the Greenwich Expenses up to the amount of the Expenses Cap.

6. The Expenses Cap shall be subject to increase upon a motion filed by the Trustee with notice to (a) Hing Chi Ngok, (b) Greenwich Land, LLC, (c) the Debtor, (d) the Official Committee of Unsecured Creditors, (e) the United States Trustee, and (f) all parties appearing in the Chapter 11 Case eligible to receive electronic notice, which motion shall be heard upon seven days' notice subject to the schedule of the Court.

7. ~~Paragraph 10(b) of~~ The Broker has agreed that, notwithstanding anything to the contrary contained in the Agreement, which entitles the Broker to the Seller/Trustee reserves the right to refuse any and all offers, including offers listed at or above the listed price. As such, the certain ~~lien~~liens rights pursuant to Conn. Gen. Stat. Ann. §Section 20-325a, has been waived by the Broker and shall have no effect do not apply to the Agreement.

8. To the extent the Motion or the Agreement is inconsistent with this Order, the terms of this Order shall govern.

9. The Trustee and the Broker are authorized and empowered to take all actions necessary to effectuate the relief granted in this Order.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.