

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

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In re: : Chapter 11
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HO WAN KWOK, *et al.*, : Case No. 22-50073 (JAM)
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Debtors.¹ : Jointly Administered
:
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**APPLICATION OF CHAPTER 11 TRUSTEE FOR ENTRY OF ORDER, PURSUANT
TO BANKRUPTCY CODE SECTIONS 327, 328, AND 330, BANKRUPTCY RULES 2014
AND 2016, AND LOCAL BANKRUPTCY RULES 2014-1 AND 2016-1, AUTHORIZING
AND APPROVING RETENTION AND EMPLOYMENT OF JAMES MORGAN AS
BARRISTER IN BRITISH VIRGIN ISLANDS**

Mr. Luc A. Despins, in his capacity as the Chapter 11 Trustee (the “Chapter 11 Trustee”) appointed in the above-captioned chapter 11 case (the “Chapter 11 Case”) of Ho Wan Kwok (the “Debtor”), pursuant to sections 327, 328, and 330 of Title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Procedure (the “Local Bankruptcy Rules”) for the United States Bankruptcy Court for the District of Connecticut (the “Court”), files this application (the “Application”) requesting entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”) authorizing his employment of Mr. James Morgan, King’s Counsel (“Mr. Morgan”), as barrister in the British Virgin Islands (“BVI”) under the instruction of Harney Westwood & Riegels LP (“Harneys”). In

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).

support of this Application, the Chapter 11 Trustee submits the *Declaration of James Morgan in Support of Application of Chapter 11 Trustee for Entry of Order, Pursuant to Bankruptcy Code Sections 327, 328, and 330, Bankruptcy Rules 2014 and 2016, and Local Bankruptcy Rules 2014-1 and 2016-1, Authorizing and Approving Retention and Employment of James Morgan as Barrister in British Virgin Islands* (the “Morgan Declaration”), attached as **Exhibit B**, which is incorporated herein by reference. In further support of this Application, the Chapter 11 Trustee states the following:

RELIEF REQUESTED

1. By this Application, the Chapter 11 Trustee seeks entry of an order, substantially in the form of the proposed order filed herewith (the “Proposed Order”), authorizing and approving the retention and employment of James Morgan, King’s Counsel as the Chapter 11 Trustee’s barrister in the BVI, effective as of September 16, 2024, to act as barrister under the instruction of Harneys in connection with the Trustee litigation in the BVI courts to that, among other things, shares of K Legacy Ltd (“K Legacy”) and the London apartment purportedly owned by K Legacy are property of the estate (the “K Legacy Action”) and related matters.

2. The Chapter 11 Trustee selected James Morgan as his barrister based on his expertise in corporate and commercial litigation in the BVI, as well as his extensive experience in complex commercial matters under BVI law.

JURISDICTION, VENUE, AND STATUTORY BASES

3. The Court has jurisdiction over this matter 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. This is a core proceeding within the meaning of 28 U.S.C. § 157(b).

4. Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are sections 327(a), 328(a), and 330 of the Bankruptcy Code, and, to the extent applicable, Bankruptcy Rules 2014 and 2016, and Local Bankruptcy Rules 2014-1 and 2016-1.

BACKGROUND

6. On February 15, 2022 (the “Petition Date”), the Debtor filed with the Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

7. On March 21, 2022, the United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”) in the Debtor’s Chapter 11 Case.

8. On June 15, 2022, the Court entered a memorandum of decision and order [Docket No. 465] (the “Trustee Order”) directing the United States Trustee to appoint a chapter 11 trustee in the Chapter 11 Case. Pursuant to the Trustee Order, the United States Trustee selected Luc A. Despins as the Chapter 11 Trustee [Docket No. 514].

9. On July 8, 2022, the Court entered an order granting the appointment of Luc A. Despins as the Chapter 11 Trustee in the Chapter 11 Case [Docket No. 523].

QUALIFICATIONS

10. James Morgan is a highly regarded commercial practitioner in the BVI, with particular expertise in the fields of restructuring and insolvency, as well as company and commercial dispute resolution. He has a wealth of trial experience and considerable expertise in applications for interim relief, including freezing orders and injunctions. Mr. Morgan is called to the Bar of the Eastern Caribbean Supreme Court, British Virgin Islands, and is experienced in dealing with cross-border issues in commercial and insolvency litigation.

ANTICIPATED SERVICES

11. The Chapter 11 Trustee anticipates that Mr. Morgan will serve as his barrister in the BVI with respect to all matters related to the K Legacy Action. Due to the specialized nature of the role of a barrister, there will be no duplication of services arising from his retention, including in connection with Harneys, who serve as the Trustee's counsel in the BVI, and from whom Mr. Morgan will receive instruction.

COMPENSATION OF MR. MORGAN

12. Mr. Morgan intends to apply to the Court for compensation for professional services rendered and for reimbursement of expenses incurred in connection with this Chapter 11 Case pursuant to sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, and any other applicable rules and orders with respect to this Chapter 11 Case. Mr. Morgan will charge the Debtor for his legal services on an hourly basis at his regularly applicable hourly rates in connection with barrister's services required in the K Legacy Action.

13. At present, Mr. Morgan's 2024 hourly rate for this type of work is £800. Mr. Morgan will also bill for out-of-pocket expenses made on behalf of the Debtor, including photocopying, postage and package deliveries, court fees, transcripts, witness fees, service fees, travel expenses, and computer-aided research.

14. The Debtor submits that Mr. Morgan's hourly rates are reasonable, comparable to his hourly rates for other engagements, and within the range of rates charged by comparably skilled professionals who offer the same services.

MR. MORGAN IS DISINTERESTED

15. To the best of the Chapter 11 Trustee's knowledge in reliance upon the Morgan Declaration, and except as disclosed therein, Mr. Morgan does not have any relationships with the Debtor, its creditors, or any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.

16. More specifically, upon the basis of the Morgan Declaration, and except as disclosed therein, the Chapter 11 Trustee believes that: (a) Mr. Morgan has no connection with the Debtor, his creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any other party with an actual or potential interest in the Debtor or his respective attorneys or accountants; and (b) Mr. Morgan (i) is not a creditor, equity security holder, or insider of the Debtor or his affiliates, (ii) has not been, within two years before the Petition Date, a director, officer, or employee of the Debtor or his affiliates, and (iii) has not had any interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in the Debtor, or for any other reason. Therefore, the Chapter 11 Trustee believes that Mr. Morgan is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, as modified by section 1107(b).

17. Based on the Morgan Declaration, the Chapter 11 Trustee believes that Mr. Morgan does not represent any adverse interest to unsecured creditors in connection with the Chapter 11 Case.

BASIS FOR RELIEF REQUESTED

18. The Chapter 11 Trustee requests to retain and employ Mr. Morgan as his barrister in the BVI with respect to the K Legacy Action pursuant to section 327(a) of the Bankruptcy

Code, which provides that a trustee, subject to the approval of the Court, may employ professional persons “that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the trustee in carrying out the trustee’s duties under this title.”

19. Under section 328(a) of the Bankruptcy Code, with bankruptcy court approval, a trustee may employ professional persons under section 327(a) of the Bankruptcy Code “on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis.” 11 U.S.C. § 328(a).

20. Bankruptcy Rule 2014(a) provides that an application for retention include:

specific facts showing the necessity for the employment, the name of the [firm] to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant’s knowledge, all of the [firm’s] connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee.

21. The Chapter 11 Trustee requires the services of a specialist King’s Counsel in BVI proceedings to opine and assist in the recovery of the luxury apartment in London (which is nominally owned by K Legacy) for the benefit of the estate. While this Court has previously entered a default judgment against K Legacy and the Debtor’s son, i.e., Qiang Guo, holding that K Legacy and the apartment are property of the estate, *see* Docket No. 76 in Adv. Proc. No. 24-5249, in order to be able to recover the property in the United Kingdom, the Trustee must also seek relief in the BVI, i.e., the jurisdiction where K Legacy is incorporated, to establish the estate ownership of K Legacy and the property. These efforts require very specialized cross-border and insolvency law expertise and Mr. Morgan is a recognized expert in that field. While Harneys is the law firm acting as the Trustee’s counsel in connection with the proceedings in the BVI, the Trustee will also require a BVI-admitted silk lawyer to represent the Trustee before the BVI

courts. Mr. Morgan will endeavor to avoid the duplication of efforts and provide services as efficiently as possible.

22. Accordingly, the employment of Mr. Morgan as the Chapter 11 Trustee's barrister, upon the terms set forth herein and in the Proposed Order, is reasonable and in the best interest of the Debtor's estate.

23. The Chapter 11 Trustee submits that Mr. Morgan's rates are reasonable, comparable to rates for other engagements, and within the range of rates charged by comparably skilled professionals who offer the same services.

24. Local Bankruptcy Rule 2014-1 provides that if "an application to employ a professional is filed within thirty (30) days after the commencement of services provided by that professional, the application shall be deemed contemporaneously filed unless the Court orders otherwise." Accordingly, the Chapter 11 Trustee requests authority to retain and employ Mr. Morgan effective September 16, 2024, which was the date that he began providing services to the Chapter 11 Trustee.

NOTICE

25. Notice of this Application has been given to the United States Trustee, the Debtor, the Committee, and, by electronic filing utilizing the Court's electronic filing ("CM/ECF") system, to all appearing parties who utilize the CM/ECF system.

NO PRIOR REQUEST

26. No previous application for the relief requested herein has been made to this or any other Court.

[Remainder of page intentionally left blank.]

CONCLUSION

WHEREFORE, for the foregoing reasons, Luc A. Despins, the Chapter 11 Trustee, requests that the Court enter an Order, substantially in the form of the Proposed Order filed herewith, granting the Application, and authorizing the Chapter 11 Trustee's employment of Mr. Morgan, as his barrister, and order such other and further relief as the Court deems just and proper.

Dated: October 15, 2024

Chapter 11 Trustee in Chapter 11 Case of Ho Wan Kwok

/s/ Luc A. Despins

Luc A. Despins

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

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date hereof, the foregoing Application was electronically filed. Notice of this filing was sent by e-mail to all parties to the above-captioned chapter 11 case by operation of the Court's electronic filing ("CM/ECF") system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

Dated: October 15, 2024
 New York, New York

By: /s/ G. Alexander Bongartz
G. Alexander Bongartz (admitted *pro hac vice*)
PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
(212) 318-6079
alexbongartz@paulhastings.com

Counsel for Chapter 11 Trustee

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).

EXHIBIT A
Proposed Order

**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

**[PROPOSED] ORDER (A) GRANTING APPLICATION OF CHAPTER 11
TRUSTEE FOR ENTRY OF ORDER, PURSUANT TO BANKRUPTCY CODE
SECTIONS 327, 328, AND 330, BANKRUPTCY RULES 2014 AND 2016, AND
LOCAL BANKRUPTCY RULES 2014-1 AND 2016-1, AUTHORIZING AND
APPROVING RETENTION AND EMPLOYMENT OF JAMES MORGAN AS
BARRISTER IN BRITISH VIRGIN ISLANDS**

Upon the application (the “Application”)² of Chapter 11 Trustee Luc A. Despins (the “Chapter 11 Trustee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), for authority to retain and employ Mr. James Morgan, King’s Counsel (“Mr. Morgan”), as barrister in the British Virgin Islands (the “BVI”), effective as of September 16, 2024, pursuant to sections 327, 328, and 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the District of Connecticut (the “Local Bankruptcy Rules”), all as more fully set forth in the Application; and upon consideration of the Application and the Morgan

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² Capitalized terms used but not otherwise defined have the meanings set forth in the Application or the Morgan Declaration.

Declaration; and this Court having jurisdiction to consider the Application and the relief requested therein in accordance with 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 consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that (i) the relief requested in the Application is in the best interest of the Debtor's estate, its creditors, and all parties-in-interest, (ii) the legal and factual bases set forth in the Application and the Morgan Declaration, and the record of any hearing on the Application before this Court establish just cause for the relief granted herein, (iii) Mr. Morgan is a "disinterested person," as defined in section 101(14) of the Bankruptcy Code and as required by section 327(a) of the Bankruptcy Code, and (iv) Mr. Morgan does not hold or represent an interest adverse to the Debtor's estate; and due and sufficient notice of the Application having been given under the particular circumstances; and it appearing that no other or further notice need be given; and a hearing having been held before this Court on _____, 2024; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The Application is granted as set forth herein.
2. The Chapter 11 Trustee is authorized to retain and employ Mr. Morgan as his barrister in the BVI effective as of September 16, 2024 on the terms set forth in the Application and the Morgan Declaration.
3. Mr. Morgan is authorized to act as the Chapter 11 Trustee's barrister, and to perform those services described in the Application.

4. The Estate shall be responsible for Mr. Morgan's compensation and reimbursement of expenses with respect to the engagement.

5. The allowance of any compensation to be paid to Mr. Morgan shall be determined in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1.

6. Allowance of any compensation for Mr. Morgan shall be limited to the extent of services actually performed, and expenses actually incurred, as barrister for the Chapter 11 Trustee Luc A. Despins, and shall not include compensation for the performance of any of the trustee duties that are generally performed by a Chapter 11 trustee without the assistance of a barrister.

7. Mr. Morgan shall provide no less than ten business days' notice to the Chapter 11 Trustee, the United States Trustee, and counsel to any official committee before any increases in the rate he charges are implemented and shall file such notice with the Court.

8. The Chapter 11 Trustee is authorized and empowered to take all actions necessary to effectuate the relief granted in this Order.

9. The requirements of the Local Bankruptcy Rules are satisfied by the contents of the Application.

10. To the extent the Application and Morgan Declaration are inconsistent with this Order, the terms of this Order shall govern.

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

12. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B

Morgan Declaration

**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

**DECLARATION OF JAMES MORGAN IN SUPPORT OF APPLICATION OF
CHAPTER 11 TRUSTEE FOR ENTRY OF ORDER, PURSUANT TO BANKRUPTCY
CODE SECTIONS 327, 328, AND 330, BANKRUPTCY RULES 2014 AND 2016, AND
LOCAL BANKRUPTCY RULES 2014-1 AND 2016-1, AUTHORIZING AND
APPROVING RETENTION AND EMPLOYMENT OF JAMES MORGAN AS
BARRISTER IN BRITISH VIRGIN ISLANDS**

I, James Morgan, being duly sworn, do depose and say:

1. I am a qualified King's Counsel and enrolled before the Bar of the Eastern Caribbean Supreme Court, British Virgin Islands as a barrister, and I also sit in London as a Deputy High Court Judge (Chancery) and as a Recorder of the County Court. I am a barrister at Radcliffe Chambers, which maintains its principal office at 11 New Square, Lincoln's Inn, London WC2A 3QB, United Kingdom, and I make this declaration (the "Declaration") in support of the *Application of Chapter 11 Trustee for Entry of Order, Pursuant to Bankruptcy Code Sections 327, 328, and 330, Bankruptcy Rules 2014 and 2016, and Local Bankruptcy Rules 2014-1 and 2016-1, Authorizing and Approving Retention and Employment of James Morgan as*

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Barrister in British Virgin Islands (the “Application”)² in connection with the K Legacy Action, and related matters (the “Engagement”).

2. In relation to the Engagement, my professional client is the estate (the “Estate”) of Ho Wan Kwok (the “Debtor”) in his above-captioned chapter 11 case (the “Chapter 11 Case”). In relation to the Engagement, I will seek to recover my fees from the Estate, and I will file fee applications in the Chapter 11 Case.

3. I graduated in Law at Jesus College, Cambridge University in 1995 and was called to the English Bar in 1996. I am a member of Inner Temple and professional organisations including the Chancery Bar Association, R3 and IWIRC. I was featured as a leader in my fields of expertise by both *Chambers UK Bar* and *The Legal 500 UK Bar*. I deal with the fields of restructuring and insolvency, as well as company and commercial dispute resolution, and have extensive trial experience and considerable expertise in applications for interim relief, including freezing orders and injunctions.

4. I will file applications for compensation of professional services rendered and for reimbursement of expenses incurred in connection with the Engagement pursuant to sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, and any other applicable rules and orders with respect to this Chapter 11 Case.

5. I will charge my hourly billing rates in connection with the Engagement. At present, my 2024 hourly rate for this type of work is £800. I may also bill the Estate for any out-of-pocket expenses made on behalf of the Chapter 11 Trustee, including photocopying, postage and package deliveries, court fees, transcripts, witness fees, service fees, travel expenses, and computer-aided research.

² Capitalized terms used but not otherwise defined have the meanings set forth in the Application.

6. To the best of my knowledge and belief after due inquiry, I am a “disinterested person” within the meaning of section 101(14) of title 11 of the United States Code (the “Bankruptcy Code”) in that I:

- a. am not a creditor, equity security holder, or insider of the Debtor;
- b. am not, and was not within two years before the date of filing of the Debtor’s petition, a director, officer, or employee of the Debtor; and
- c. do not have an interest materially adverse to the interest of the Debtor’s estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

7. I attach to this Declaration, as Schedule 1, a consolidated list of parties in interest in connection with the Chapter 11 Case (the “Interested Parties”) that has been produced by Paul Hastings and provided to me before my signing this Declaration that I am informed includes:

- a. parties listed as creditors, executory contract counterparties, and co-debtors on the Debtor’s Schedules D, F, G, and H [Docket No. 78];
- b. parties listed on the Debtor’s Statement of Financial Affairs (“SOFA”) [Docket No. 77], including (i) as recipients of payments within 90 days prior to the filing of the Chapter 11 Case (SOFA Part 3, Question 6); (ii) parties involved in litigation in which the Debtor is a party (SOFA Part 4, Question 9);
- c. businesses owned by the Debtor (SOFA Part 11, Question 27);
- d. parties and counsel filing notice of appearances in the Chapter 11 Case;
- e. the Court and personnel of the office of the United States Trustee; and

- f. other parties in interest that I have become aware of as a result of the Chapter 11 Trustee's ongoing investigation of the Debtor's assets.

I have conducted reasonable checks of the Interested Parties against my records and data, and have determined that to the best of my knowledge and belief, I do not have any relationship or connection with the Largest Unsecured Creditors, the Debtor, Family Members and Related Entities, the Bankruptcy Judge and U.S. Trustee Personnel. To the best of my knowledge, I do not have any relationship or connection with the Other Interested Parties, or, to the best of my knowledge, with any other creditor of the Debtor.

8. While I have made a diligent effort to ascertain the identity of any connections or potential conflicts with the Interested Parties, to the extent that any additional information comes to light, I will review, disclose, and resolve any conflict or adverse interests that may appear.

9. Based on the foregoing, insofar as I have been able to ascertain based on the information currently available to me: (a) I have no connection with the Debtor, his creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any other party with an actual or potential interest in the Debtor or his respective attorneys or accountants; and (b) (i) I am not a creditor, equity security holder, or insider of the Debtor or his affiliates, (ii) I have not been, within two years before the Petition Date, a director, officer, or employee of the Debtor or his affiliates, and (iii) I do not have any interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in the Debtor, or for any other reason. Therefore, I understand from information provided to me by Paul Hastings that this means I am a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, as modified by section 1107(b).

10. I further understand from such information that Appendix B of the U.S. Trustee Guidelines (the “Larger Case Guidelines”) does not apply in this Chapter 11 Case, because the Debtor’s petition does not list \$50 million or more in assets and \$50 million or more in liabilities. In particular, I am informed that the Debtor estimated the value of his assets between \$50,001 and \$100,000.

11. In the interest of providing maximum disclosure, and notwithstanding my position concerning the inapplicability of the Larger Case Guidelines, I provide the following response to the request for information set forth in Paragraph D.1. of the Larger Case Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?

Answer: No.

Question: Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?

Answer: No.

Question: If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

Answer: Not applicable. I have not previously represented the Chapter 11 Trustee.

Question: Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?

Answer: Not applicable.


12. I have neither shared nor agreed to share with any other person compensation received in connection with the Engagement, except as is permitted by §504(b)(1) of the Bankruptcy Code.

13. I consent that the following language may be included in any order by the Court approving the Chapter 11 Trustee's application in connection with my instruction in connection with the Engagement.

Allowance of any compensation for Mr. Morgan shall be limited to the extent of services actually performed, and expenses actually incurred, as barrister instructed to act on behalf of the Chapter 11 Trustee Luc A. Despins, and shall not include compensation for the performance of any of the trustee duties that are generally performed by a Chapter 11 trustee without the assistance of a barrister.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the above statements are true and correct.

Dated: October 14, 2024, at London, United Kingdom



James Morgan

Schedule 1

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
ARNALL GOLDEN GREGORY LLP
ARNOLD & PORTER KAYE SCHOLER LLP
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 & GIANTOMASI PC
 CHINA CITIC BANK INT'L
 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
 CROWELL & MORING LLP
 CRYSTAL BREEZE INVESTMENTS LIMITED
 CUI ZHU LI
 CUMMINGS & LOCKWOOD, LLC
 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
 DLA PIPER LLP (US)
 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
 FAEGRE DRINKER BIDDLE & REATH LLP
 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
 FINN DIXON & HERLING LLP
 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
 GEORGIU 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 TRAUIG, 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
 HAORYU 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
INTESA SANPAOLO SPA
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.
K&L GATES LLP
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
KIRKLAND & ELLIS LLP
KOPPLE, KLINGER & ELBAZ, LLP
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
LAW OFFICES OF RONALD I. CHORCHES, LLC
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
MARINO, ZABEL & SCHELLENBERG, PLLC
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
MINTZ & GOLD LLP
MISHCON DE REYA LLP
MOA-FU
MODSQUAD INC.
MORAN YACHT MANAGEMENT, INC.
MORGAN STANLEY
MORITT HOCK & HAMROFF
MORRISON COHEN LLP
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 BEJING 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
SPEARS MANNING & MARTINI 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
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WALLEX PAY LLC
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WARROOM BROADCASTING & MEDIA
COMMUNICATIONS LLC
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WEATHERTEST COMPANY INC.
WEBSTER FINANCIAL CORPORATION
WEDDLE LAW PPLC
WEDLAKE BELL LLP
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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
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LIMITED
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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
XIQUI ("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
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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
ZEICHER ELLMAN & KRAUSE LLP
ZEISLER & ZEISLER, P.C.
ZETA GLOBAL CORP.
ZHANG LIN
ZHANG WEI
ZHENG RUI HE
ZHENG WU (A/K/A BRUNO WA)
ZHENGHUA 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
ZYB & ASSOCIATES, LLC