

**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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**REQUEST OF CHAPTER 11 TRUSTEE FOR
STATUS CONFERENCE REGARDING JANUARY 15, 2025 HEARINGS**

Luc A. Despins, in his capacity as the chapter 11 trustee (the “Trustee”) appointed in the chapter 11 case of Ho Wan Kwok (the “Individual Debtor”), hereby requests (this “Request”) that the Court schedule a remote status conference in in the above-captioned chapter 11 case (the “Chapter 11 Case”) and in the Other Adversary Proceedings² prior to the January 15, 2025 hearings (as more specifically described below, the “Hearings”). In support of this Request, the Trustee respectfully states the following.

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 the 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 The Other Adversary Proceedings are: *Despins v. Arri Americas Inc.* (Adv. Proc. No. 24-05031); *Despins v. McManimon, Scotland & Baumann, LLC* (Adv. Proc. No. 24-05194); *Despins v. FFP (BVI) Limited* (Adv. Proc. No. 24-05056); *Despins v. Mitchell* (Adv. Proc. No. 24-05110); *Despins v. V.X. Cerda & Associates P.A.* (Adv. Proc. No. 24-05134); *Despins v. The Francis Firm PLLC* (Adv. Proc. No. 24-05168); *Despins v. Berkeley Rowe Limited* (Adv. Proc. No. 24-05186); *Despins v. Weddle Law PLLC* (Adv. Proc. No. 24-05188); *Despins v. Lawall & Mitchell, LLC*, et al. (Adv. Proc. No. 24-05199); *Despins v. G4S Security Systems (Hong Kong) Ltd.* (Adv. Proc. No. 24-05204); *Despins v. ACASS Canada LTD.* (Adv. Proc. No. 24-05226); *Despins v. Apple Inc.*, et al. (Adv. Proc. No. 24-05060); *Despins v. Meta Platforms Inc.* (Adv. Proc. No. 24-05117); *Despins v. Liberty Jet Management Corp.* (Adv. Proc. No. 24-05135); *Despins v. Harcus Parker Limited* (Adv. Proc. No. 24-05163); *Despins v. Zeisler & Zeisler, P.C.* (Adv. Proc. No. 24-05208); and *Despins v. Miller* (Adv. Proc. No. 24-05219).

On November 27, 2024, the Court scheduled a hearing for January 15, 2025 at 10 a.m. to consider motions to dismiss or for judgment on the pleadings (the “Joint Defendants’ Motions”) filed by 38 defendants (the “Joint Defendants”) based on the *Joint Defendants’ Omnibus Memorandum in Support of Motion to Dismiss or for Judgment on the Pleadings* [Docket No. 3713] (the “Joint Brief”). At the same date and time, the Court has also scheduled hearings on motions to dismiss or for judgment on the pleadings (the “Other Motions”) filed in the 17 Other Adversary Proceedings.

To efficiently and effectively prepare for and participate in the Hearings, the Trustee respectfully requests a brief status conference to discuss the format of the Hearings. Among other things, the Trustee wishes to inquire whether the Court intends to hear argument on the Other Motions solely as to issues that overlap with those presented in the Joint Brief, or whether the Court wishes to hear argument on each of the Other Motions in full. The Trustee would also like to discuss logistics for the Hearings, such as the sequencing of motions, time allocations, and the number of attorneys presenting argument, to ensure that the Hearings run as smoothly and efficiently as possible. The Trustee respectfully requests that this status conference be held via the Court’s Zoom.gov platform to minimize expense.

The Trustee has filed this Request in the Chapter 11 Case and in each of the Other Adversary Proceedings, and the Trustee has caused this Request to be served on all of the Joint Defendants as well as all defendants that are party to the Other Motions.

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Dated: December 20, 2024
New Haven, Connecticut

LUC A. DESPINS,
CHAPTER 11 TRUSTEE

By: /s/ Patrick R. Linsey

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Counsel for the Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT
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	:	
Debtors.	:	Jointly Administered
	:	
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**[PROPOSED] ORDER GRANTING REQUEST OF CHAPTER 11 TRUSTEE FOR
STATUS CONFERENCE REGARDING JANUARY 15, 2025 HEARINGS**

Upon the request (the “Request”) of Luc A. Despins, as Chapter 11 Trustee (the “Trustee”) appointed in the Chapter 11 Case of Ho Wan Kwok, for the Court to schedule a status conference in the Chapter 11 Case and the Other Adversary Proceedings¹ for the purpose described in the Request, it is hereby:

ORDERED: A status conference (the “Status Conference”) will be held at _____ .m. on _____, 202_, to discuss the format of the Hearings on the Joint Defendants’ Motions and the Other Motions; and it is further

ORDERED: that the Status Conference shall be held on a remote basis via the Court’s Zoom.gov platform, and parties wishing to attend the hearing may obtain login instructions to connect to the ZoomGov remote conference by sending an email to the Clerk’s office via the following court email address: CalendarConnect_BPT@ctb.uscourts.gov; and it is further

ORDERED: that the Trustee shall cause this Order to be served by email on counsel for all of the Joint Defendants and for all defendants that are party to the Other Motions within two business days and the Trustee shall file a certificate of service in advance of the Status Conference.

¹ Capitalized terms not expressly defined herein adopt the definitions ascribed to them in the Request.

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	:	
Debtors.	:	Jointly Administered
	:	
	-----X	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date hereof, the foregoing Request was electronically filed using the Court's case management/electronic case files system ("CM/ECF") in the Chapter 11 Case and each of the Other Adversary Proceedings. Notice of this filing will be sent automatically via e-mail by operation of CM/ECF to all appearing parties in the Chapter 11 Case and the Other Adversary Proceedings eligible to receive electronic notice.

In addition, on the date hereof, the undersigned has caused this Request to be served by manual email on counsel for all of the Joint Defendants and on counsel for all defendants that are party to the Other Motions as set forth on the attached **Exhibit A**.

Dated: December 20, 2024
New Haven, Connecticut

By: /s/ Patrick R. Linsey
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EXHIBIT A

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