

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT

In re:

HO WAN KWOK, *et al.*,

Debtors.

Chapter 11

Case No. 22-50073 (JAM)

(Jointly Administered)

**TENTH CONSENTED TO MOTION OF CHAPTER 11 TRUSTEE TO ADJOURN  
HEARING ON MOTION OF CHAPTER 11 TRUSTEE FOR ENTRY OF ORDER  
COMPELLING DBS BANK LTD TO COMPLY WITH RULE 2004 SUBPOENA**

Luc A. Despins, in his capacity as chapter 11 trustee (the “Trustee”) in the above-captioned chapter 11 case of Ho Wan Kwok, upon the consent of DBS Bank Ltd (“DBS” and, together with the Trustee, collectively, the “Parties”), hereby respectfully moves (the “Motion to Adjourn”) to adjourn the hearing on the *Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 2396] (the “Motion to Compel”), as set forth in the proposed Consent Order attached hereto as **Exhibit A** (the “Proposed Consent Order”). In support of the Motion to Adjourn, the Trustee respectfully states the following:

1. The Trustee filed the Motion to Compel on November 29, 2023. After the Trustee filed the Motion to Compel, the Trustee and DBS, through their respective counsel, conferred in good faith regarding the Motion to Compel and agreed to adjourn the initial hearing date.

2. On January 23, 2024, the Trustee filed the *Second Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 2517], which this Court granted on January 24, 2024 [ECF No. 2526], adjourning the hearing on the Motion to Compel to March 5, 2024, at 1 p.m.

3. On February 26, 2024, the Trustee filed the *Third Consented to Motion to Adjourn*

*Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 2959], which this Court granted on February 28, 2024 [ECF No. 2967], adjourning the hearing on the Motion to Compel to April 9, 2024, at 1:30 p.m.

4. On April 2, 2024, the Trustee filed the *Fourth Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 3070], which this Court granted on April 3, 2024 [ECF No. 3071], adjourning the hearing on the Motion to Compel to June 18, 2024, at 1:30 p.m.

5. On June 7, 2024, the Trustee filed the *Fifth Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 3235], which this Court granted on June 10, 2024 [ECF No. 3236], adjourning the hearing on the Motion to Compel to August 6, 2024, at 1:00 p.m.

6. On July 30, 2024, the Trustee filed the *Sixth Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF No. 3361], which this Court granted on July 31, 2024 [ECF No. 3367], adjourning the hearing on the Motion to Compel to September 24, 2024, at 1:00 pm.

7. On September 16, 2024, the Trustee filed the *Seventh Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF no. 3535], which this Court granted on September 18, 2024 [ECF No. 3545], adjourning the hearing on the Motion to Compel to November 26, 2024, at 1:00 p.m.

8. On November 20, 2024, the Trustee filed the *Eighth Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* [ECF 3843], which this Court granted on November 21, 2024

[ECF 3846], adjourning the hearing on the Motion to Compel to January 28, 2025, at 1:00 p.m.

9. On January 22, 2025, the Trustee filed the *Ninth Consented to Motion to Adjourn Hearing on Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena* (the “Prior Motion to Adjourn”) [ECF 3990], which this Court granted on January 22, 2025 [ECF 3992], adjourning the hearing on the Motion to Compel to April 1, 2025, at 1:00 p.m.

10. Since the Court granted the Prior Motion to Adjourn, the parties have continued to confer in good faith in an effort to resolve their disputes while reserving their respective rights. In light of their cooperation and ongoing discussions, the parties wish to avoid expending resources litigating the Motion to Compel at this time.

11. Accordingly, the Trustee requests that the hearing on the Motion to Compel be adjourned to the first date that is convenient to the Court on or after June 1, 2025. The Trustee further requests that the deadline for DBS to respond to the Motion to Compel be set one week in advance of the adjourned hearing date. This is the tenth request for the relief sought herein. DBS consents to this relief.

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK.]*

WHEREFORE, the Trustee respectfully requests that the Court grant the Motion to Adjourn by entering the Proposed Consent Order and grant such other relief as is just and proper.

Dated: March 25, 2025  
New Haven, Connecticut

LUC A. DESPINS,  
CHAPTER 11 TRUSTEE

/s/ Kari A. Mitchell  
Kari A. Mitchell (ct31578)  
Patrick R. Linsey (ct29437)  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT**

In re:

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Chapter 11

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 25, 2025, the foregoing was electronically filed. Notice of this filing was sent by e-mail to all parties able to receive electronic notice by operation of the Court's electronic filing ("CM/ECF") system. Parties may access this filing through the Court's CM/ECF system.

Dated: March 25, 2025  
New Haven, Connecticut

LUC A. DESPINS,  
CHAPTER 11 TRUSTEE

/s/ Kari A. Mitchell

Kari A. Mitchell (ct31578)  
Patrick R. Linsey (ct29437)  
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*Counsel for the Chapter 11 Trustee*

**EXHIBIT A**

**(PROPOSED CONSENT ORDER)**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT

In re:

HO WAN KWOK, *et al.*,

Debtors.

Chapter 11

Case No. 22-50073 (JAM)

(Jointly Administered)

**[PROPOSED] TENTH CONSENT ORDER ADJOURNING HEARING ON MOTION OF  
CHAPTER 11 TRUSTEE FOR ENTRY OF ORDER COMPELLING  
DBS BANK LTD TO COMPLY WITH RULE 2004 SUBPOENA**

Upon the motion (the “Motion”) of Luc A. Despins, chapter 11 trustee (the “Trustee”), filed upon the consent of DBS Bank Ltd (“DBS”), to adjourn hearing on the Motion of Chapter 11 Trustee for Entry of Order Compelling DBS Bank Ltd to Comply with Rule 2004 Subpoena [ECF No. 2396] (the “Motion to Compel”), and due and sufficient notice having been given, and good cause appearing for the relief sought by the Motion, it is hereby

**ORDERED**, that the hearing on the Motion to Compel is adjourned to \_\_\_\_\_, 2025, at \_\_\_\_\_.m., to be held at the United States Bankruptcy Court for the District of Connecticut, 915 Lafayette Blvd., Room 123, Courtroom, Bridgeport, CT; and it is further

**ORDERED**, that DBS shall file any response to the Motion to Compel by \_\_\_\_\_, 2025.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
Hon. Julie A. Manning  
United States Bankruptcy Judge