LAZARE POTTER GIACOVAS & MOYLE LLP Michael T. Conway, Esq. 747 Third Avenue, 16th Floor New York, NY 10017 Telephone: (917) 242-1597 mconway@lpgmlaw.com

Counsel for Taurus Fund LLC, Scott Barnett, as Trustee of Taurus Fund and Taurus Management LLC, as Trustee of Taurus Fund LLC

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF CONNECTICUT

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

MOTION TO PERMIT COUNSEL FOR TAURUS FUND LLC TO APPEAR REMOTELY AT THE APRIL 22, 2025 HEARING AND STATUS CONFERENCE

Taurus Fund LLC ("<u>Taurus</u>") moves to allow their counsel, Michael T. Conway to appear remotely via the Court's Zoom platform at the expedited hearing on the Trustee's second motion to increase cap on funding expenses of the Mahwah Mansion (the "<u>Motion</u>") and the main case status conference ("<u>Status Conference</u>"), both currently set for April 22, 2025, at 1:00 p.m., prevailing eastern time.

- 1. As this Court is aware, Taurus is a defendant in an adversary proceeding dealing with the Mahwah Mansion at issue in the Motion [ECF No. 4299]. Taurus takes no position with respect to the Motion, but thought this Court may have questions for counsel and therefore seeks to be present for this purpose.
- 2. Also, in response to the *Request of Chapter 11 Trustee for Status Conference* asking for a status conference to "advise the Court regarding developments relevant to these

Chapter 11 Cases, including without limitation, developments in other proceedings (e.g., those

pending outside of the United States) that may impact these cases" [ECF No. 4303], the Court

entered an Order [ECF No. 4317] setting the Status Conference.

3. As a defendant in a pending adversary proceeding, Taurus may have an interest

in matters to be reported by the Trustee.

4. The undersigned is not available to attend the Motion or the Status Conference in

person due to a commitment in another matter pending in New York later the same afternoon, but

wishes to be available as stated above in case the Court has questions for him, as well as to monitor the Status

Conference on behalf of Taurus. Given the foregoing, Taurus respectfully requests that the Court

permit Mr. Conway to participate via the Court's Zoom platform.

WHEREFORE, Taurus respectfully requests that the Court allow Mr. Conway to attend

the Status Conference remotely via the Court's Zoom platform.

Dated: April 21, 2025

New York, New York

LAZARE POTTER GIACOVAS & MOYLE LLP

By: /s/ Michael T. Conway

Michael T. Conway

Lazare Potter Giacovas & Moyle LLP

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Counsel for Taurus Fund LLC, Scott Barnett, as Trustee of Taurus Fund and

Taurus Management LLC, as Trustee of

Taurus Fund LLC

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CERTIFICATE OF SERVICE

The undersigned certifies that on April 21, 2025, a copy of the foregoing document was served on all parties of record via CM/ECF.

Dated: April 21, 2025

By: /s/ Michael T. Conway
Michael T. Conway