

Aaron Javian
Christopher P. Hoffman
Nicole Lech
REED SMITH LLP
599 Lexington Ave
New York, NY 10022
Tel: (212) 521-5400

Counsel to the Foreign Representative

**UNITED STATES BANKRUPTCY
COURT SOUTHERN DISTRICT OF
NEW YORK**

In re)
)
IIG Trade Opportunities Fund N.V. ¹)
)
Debtor in a foreign proceeding.)
)

Chapter 15
Case No.20-10666 (MEW)

**MOTION FOR ORDER SPECIFYING FORM AND MANNER OF
SERVICE OF NOTICE AND SCHEDULING RECOGNITION HEARING**

Ms. V. P. Maria LLM, in her capacity as court-appointed bankruptcy trustee of IIG Trade Opportunities Fund N.V. (“**IIG TOF**” or the “**Fund**”), and foreign representative (the “**Foreign Representative**” or the “**Trustee**”) of IIG TOF’s liquidation proceeding (the “**Curaçao Liquidation**”) currently pending before the Court of First Instance of Curaçao (the “**Curaçao Court**”) pursuant to the *Faillissementsbesluit 1931*, by her United States attorneys, Reed Smith LLP, respectfully submits this motion (“**Motion**”), seeking entry of an order substantially in the form attached hereto as **Exhibit A**, (the “**Proposed Order**”): (i) scheduling a hearing on the relief sought in the Official Form Petition and *Verified Petition Under Chapter 15 For Recognition Of A Foreign Main Proceeding And Related Relief* (the “**Verified Petition**,” and, together with the

¹ The last four digits of IIG TOF’s company number are (5220). IIG TOF’s registered office is Blenchiweg 23, Curaçao.

Official Form Petition, the “**Petition**”) in the form attached as **Exhibit B** (the “**Notice**”); (ii) setting the deadline by which any responses or objections to the Petition must be received; and (iii) specifying the form and manner of service of notice thereof. In support of the Motion, the Foreign Representative states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334 and section 1501 of the Bankruptcy Code, as well as the *Amended Standing Order of Reference*, dated January 31, 2012, 12 Misc. 00032 (S.D.N.Y. Feb. 1, 2012) (Preska, C.J.). This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).

2. Venue is proper pursuant to 28 U.S.C. § 1410(1) and (3).

3. The statutory predicates for the relief requested herein are sections 105(a), 1514, and 1515 of the Bankruptcy Code and Rules 2002, 9007, and 9008 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”).

Relief Requested

4. The Foreign Representative respectfully requests entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (i) scheduling the date for the hearing to consider the relief sought in the Petition (the “**Hearing**”) at the earliest possible time; (ii) setting the deadline by which any responses or objections to the Petition must be received (the “**Objection Deadline**”); (iii) approving the form of the notice of this chapter 15 case, the relief sought in the Petition, the Objection Deadline, and the Hearing (the “**Notice**”) that is attached as **Exhibit B**; (iv) waiving the requirements set forth in section 1514(c) of the Bankruptcy Code; and (v) approving the manner of service of the Notice described herein.

5. Additionally, the Foreign Representative respectfully requests that the Court grant this Motion without notice to third parties. The Foreign Representative will serve notice of the

signed Proposed Order together with the Notice and the Petition (together, the “**Notice Documents**”) in accordance with the procedures set forth in this Motion. In light of the nature of the relief requested, the Foreign Representative submits that no other or further notice of this Motion is necessary or required.

Basis for Relief

A. The Proposed Hearing and Notice Procedures Comply with the Bankruptcy Code and Bankruptcy Rules

6. Bankruptcy Rule 2002(q)(1) requires “at least 21 days’ notice by mail of the hearing” on a petition for recognition of a foreign proceeding. Bankruptcy Rule 2002(q)(1) provides that:

. . . the debtor, all persons or bodies authorized to administer foreign proceedings of the debtor, all entities against whom provisional relief is being sought under § 1519 of the Code, all parties to litigation pending in the United States in which the debtor is a party at the time of the filing of the petition, and such other entities as the court may direct, [shall be given] notice by mail of the hearing on the petition for recognition of a foreign proceeding. . . .

Bankruptcy Rule 2002(q), however, does not specify the form and manner in which notice must be given. Pursuant to Bankruptcy Rules 2002(m) and 9007, when notice is to be given under the Bankruptcy Rules, the presiding court may designate the form and manner in which such notice shall be given.

7. Pursuant to Bankruptcy Rule 2002(q), the Foreign Representative proposes to serve the Notice Documents by email or first class mail within three business days following entry of the Proposed Order on: (i) the United States Trustee for the Southern District of New York; (ii) IIG TOF; (iii) all persons or bodies authorized to administer foreign proceedings of IIG TOF, including the Curaçao Liquidation; (iv) the parties listed in **Exhibit C** attached hereto, which includes all entities against whom provisional relief is being sought, all parties to litigations pending in the United States to which IIG TOF is a party or interested party at the time of filing

and all known creditors of IIG TOF in the United States; and (v) all parties that have filed a notice of appearance in this chapter 15 case (collectively, the “**Notice Parties**”).² In addition, as a courtesy, the Foreign Representative proposes to serve the Notice Documents by email to known shareholders, members, and foreign creditors of IIG TOF.

8. The Notice will notify the Notice Parties of the commencement of IIG TOF’s chapter 15 case, the relief sought in the Petition, the Objection Deadline, and the procedures for filing a response or objection to the Petition. The Notice will also provide the electronic case filing (“**ECF**”) website maintained by the federal judiciary where interested parties may view all pleadings filed in this chapter 15 case and the public website maintained by the Foreign Representative, <https://vpm-law.com/iig-trade-opportunities-fund/>, where interested parties may view the pleadings filed by the Foreign Representative in the chapter 15 case free of charge.

9. Because several Notice Parties might have foreign addresses, Bankruptcy Rule 2002(p) might apply. Pursuant to Bankruptcy Rule 2002(p), the Office of the United States Trustee, a party in interest, or this Court may determine that supplemental notice is appropriate to ensure that parties with foreign addresses receive sufficient notice in a bankruptcy case. The Foreign Representative submits that posting the Notice on the website maintained by the Foreign Representative will ensure that sufficient notice of the Petition, the Objection Deadline, and the time, date, and place of the Hearing is provided to parties with foreign addresses.

10. The Foreign Representative submits that the form and manner of service of the Notice Documents and the procedures outlined herein constitute adequate and sufficient notice of this chapter 15 case, the relief sought in the Petition, the Objection Deadline, and the Hearing to

² The Foreign Representative respectfully requests that if any party files a notice of appearance in this chapter 15 case, the Foreign Representative shall serve the Notice and any subsequent notices on that party within five business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel).

all necessary parties. Accordingly the Foreign Representative respectfully requests that this Court approve the form and manner of service of the Notice for the Notice Parties.

11. Bankruptcy Rule 1011(b) sets the period during which a party may object to the recognition of a chapter 15 petition at 21 days from the date of service of the petition. The Foreign Representative respectfully requests, pursuant to Bankruptcy Rules 1011(b) and 2002(q), that this Court set the Objection Deadline on or about 21 days after service of the Notice Documents. The Foreign Representative also requests that the Court require all responses to the Notice Documents be made in accordance with the Bankruptcy Code, the local rules of this Court, and the Bankruptcy Rules, including and specifically, without limitation, Rule 1011 of the Bankruptcy Rules, in writing describing the basis therefor, which must be filed with the Office of the Clerk of the Court, One Bowling Green, New York, NY 10004-1408, and served upon counsel for the Foreign Representative so as to be received by the Objection Deadline.

B. Section 1514(c) is not Applicable to this Case.

12. Section 1514(c) provides that “[w]hen a notification of commencement of a case is to be given to foreign creditors, such notification shall (1) indicate the time period for filing proofs of claim and specify the place for filing such proofs of claim; [and] (2) indicate whether secured creditors need to file proofs of claim....” 11 U.S.C. § 1514(c). Notice will be sent to the Notice Parties as detailed herein, informing them that this chapter 15 case has been commenced and providing details as to how they can obtain copies of the pleadings in the chapter 15 case. Accordingly, the Foreign Representative respectfully requests that the requirements contained in section 1514(c) of the Bankruptcy Code be waived.

No Prior Request

13. No prior motion for the relief sought herein has been made to this or any other court.

WHEREFORE, for the foregoing reasons, the Foreign Representative respectfully requests that the Court (i) enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and (ii) grant such other and further relief as is just and proper.

Dated: March 2, 2020
New York, New York

Respectfully submitted,

/s/ Aaron Javian

Aaron Javian
Christopher P. Hoffman
Nicole Lech
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 521-5400

Counsel to the Foreign Representative

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----)	
In re)	Chapter 15
)	
IIG Trade Opportunities Fund N.V. ¹)	Case No. 20-10666 (MEW)
)	
Debtor in a foreign proceeding.)	
)	

[PROPOSED] ORDER SCHEDULING RECOGNITION HEARING, APPROVING FORM AND MANNER OF NOTICE, AND GRANTING RELATED RELIEF

Upon the motion (the “**Motion**”)² of Ms. V. P. Maria LLM (the “**Foreign Representative**”) in the above-captioned chapter 15 case (the “**Chapter 15 Case**”) requesting entry of an order (this “**Order**”) (i) setting the date for the hearing to consider the relief sought in the Petition at the earliest possible time (the “**Hearing**”), (ii) setting the objection deadline by which any responses or objections to the Petition must be received (the “**Objection Deadline**”), (iii) approving the form of the notice of this chapter 15 Case, the relief sought in the Petition, the Objection Deadline and the Hearing (the “**Notice**”) and (iv) approving the manner of service of the Notice described herein; and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the Southern District of New York dated as of January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11, 12 Misc. 00032* (S.D.N.Y. Feb. 1, 2012) (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue

¹ The last four digits of IIG TOF’s company number are (5220). IIG TOF’s registered office is Blenchiweg 23, Curaçao.

² Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

of this proceeding being proper before the Court pursuant to 28 U.S.C. § 1410(1) and (3); and the Court having determined that the relief requested in the Motion is necessary and beneficial to IIG TOF; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Hearing to consider the relief sought in the Petition shall be held before this Court in Room [] of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on March __, 2020 at []:[] []_m. (Eastern Time).
3. The form of Notice attached to the Motion as **Exhibit B** is hereby approved.
4. Prior to serving the Notice or causing it to be served, the Foreign Representative may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further non-material, non-substantive changes as the Foreign Representative deems necessary or appropriate.
5. Copies of the Notice Documents shall be served by email or first class mail upon: (i) the United States Trustee for the Southern District of New York; (ii) IIG TOF; (iii) all persons or bodies authorized to administer foreign proceedings of IIG TOF, including the Curaçao Liquidation; (iv) the parties listed in **Exhibit C** attached to the Motion, which includes all entities against whom provisional relief is being sought, all parties to litigations pending in the United States to which IIG TOF is a party or interested party at the time of filing and all known creditors of IIG TOF in the United States; and (v) all parties that have filed a notice of appearance in this chapter 15 case (collectively, the “**Notice Parties**”) on or before March __, 2020.

6. Pursuant to Bankruptcy Rule 2002(p), posting the Notice on the Website maintained by the Foreign Representative, <https://vpm-law.com/iig-trade-opportunities-fund/>, ensures that sufficient notice of the Petition, the time fixed for filing objections to the relief sought in the Petition and the time, date, and place of the Hearing is provided to parties with foreign addresses.

7. The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of this chapter 15 case or, to the extent applicable, are hereby waived.

8. In the event any party files a notice of appearance in this chapter 15 case subsequent to the Foreign Representative's initial service of the Notice Documents as provided for in this Order, the Foreign Representative will serve, or cause to be served on such party, the Notice Documents and any subsequent notices upon that party within five business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel).

9. Subsequent notices shall be served in the form and manner set forth in this Order or as otherwise required by the Bankruptcy Code and Bankruptcy Rules.

10. Any party in interest wishing to submit a response or objection to the Petition must do so in writing and in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis for such response or objection with specificity and the nature and extent of the respondent's claims against IIG TOF. Such responses or objections must be filed electronically with the Court by registered users of the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website

at <http://www.nysb.uscourts.gov>) and by all other parties in interest, on a compact disc in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, which disc shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any response or objection shall be sent to the Chambers of the Honorable _____, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon counsel for the Foreign Representative, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian and Christopher P. Hoffman), so as to be actually received on or before March __, 2020 at []:[] [] .m. (Eastern Time).

11. Service of the Notice Documents in accordance with this Order is hereby approved as adequate and sufficient notice and service on all interested parties. Notice provided in accordance with this Order satisfies the requirements of the Bankruptcy Code and the Bankruptcy Rules, including Bankruptcy Rules 2002(p) and (q). No other or further notice is required.

12. Notwithstanding any provision in the Bankruptcy Code, the Bankruptcy Rules or the Local Bankruptcy Rules to the contrary, including, but not limited to Local Bankruptcy Rule 9078-1, the Foreign Representative shall file the certificate of service of the Notice Documents in advance of the Hearing.

13. Bankruptcy Rule 1010 does not apply to a petition seeking recognition of a foreign main proceeding and, accordingly, the summons requirement in Bankruptcy Rules 1010(a) and 1011(b) are inapplicable.

14. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

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

16. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: New York, New York
_____, 2020

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Proposed Notice

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	
)	Chapter 15
IIG Trade Opportunities Fund N.V. ¹)	
)	Case No. 20-10666 (MEW)
Debtor in a foreign proceeding.)	
)	

**[PROPOSED] NOTICE OF FILING AND HEARING ON PETITION SEEKING
RECOGNITION OF FOREIGN PROCEEDING AND RELATED RELIEF PURSUANT
TO CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on March 2, 2020, Ms. V. P. Maria LLM, in her capacity as court-appointed bankruptcy trustee of IIG Trade Opportunities Fund N.V. (“**IIG TOF**” or the “**Fund**”), and foreign representative (the “**Foreign Representative**” or the “**Trustee**”) of IIG TOF’s Liquidation proceeding (the “**Curaçao Liquidation**”) currently pending before the Court of First Instance of Curaçao (the “**Curaçao Court**”) pursuant to the *Faillissementsbesluit 1931* (as amended, the “**Curaçao Bankruptcy Act**”), by her United States attorneys, Reed Smith LLP, filed the *Chapter 15 Petition for Recognition of a Foreign Proceeding* and the *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* (together, the “**Petition**”) for IIG TOF pursuant to chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that the Foreign Representative seeks the entry of an order finding that (i) IIG TOF is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the Curaçao Liquidation is a foreign main proceeding within the meaning of section 1502 of the Bankruptcy Code, (iii) the Foreign Representative satisfies the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, (iv) the Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code, (v) granting recognition of the Curaçao Liquidation as a “foreign main proceeding” under sections 1517 and 1520 of the Bankruptcy Code, (vi) granting certain additional relief under sections 1507 and 1521 of the Bankruptcy Code, and (vii) granting such other related relief as is just and proper under the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing (the “**Hearing**”) to consider the relief requested in the Petition for [●]:[●] [●].m. (**Eastern Time**) on [●], 2020 in Room ___ of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

¹ The last four digits of IIG TOF’s company number are (5220). IIG TOF’s registered office is Blenchiweg 23, Curaçao.

PLEASE TAKE FURTHER NOTICE that copies of the Petition and all documents filed in this chapter 15 case are available to parties in interest on (i) the Foreign Representative's Website at <https://vpm-law.com/iig-trade-opportunities-fund/>, (ii) the Court's Electronic Case Filing System, which can be accessed from the Court's website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document), or (iii) upon written request to the Foreign Representative's counsel (including by facsimile or e-mail) addressed to:

REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400

Attn: Aaron Javian
ajavian@reedsmith.com
Christopher P. Hoffman
choffman@reedsmith.com

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Petition must do so in writing and in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis for such response or objection with specificity and the nature and extent of the respondent's claims against IIG TOF. Such responses or objections must be filed electronically with the Court by registered users of the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at <http://www.nysb.uscourts.gov>) and by all other parties in interest, on a compact disc in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, which disc shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any response or objection shall be sent to the Chambers of the Honorable _____, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon counsel for the Foreign Representative, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian and Christopher P. Hoffman), so as to be actually received on or before March __, 2020 at []:[] []_m. (Eastern Time).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petition must appear at the Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that, at the Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the cases.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Petition without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment

filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

Dated: March [●], 2020
New York, New York

Aaron Javian
Christopher P. Hoffman
Nicole Lech
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022

Counsel to the Foreign Representative

EXHIBIT C

Notice List

20-10666-mew Doc 5-3 Filed 03/02/20 Entered 03/02/20 13:54:36 Exhibit C
1 of 6

Name	Address	Email Address
Bank Leumi USA	c/o Jordan Derek Weinreich Sherman Wells Sylvester & Stamelman LLP 1185 Avenue of the Americas, 3rd Fl. New York, NY 10036	jweinreich@shermanwells.com
BNY Mellon	240 Greenwich Street New York, NY 10286	
Cates Management N.V.	c/o Ms. Ruby Cato Blenchiweg 23 Curacao	
Chaffetz Lindsey	Peter Chaffetz 1700 Broadway, 33rd Floor New York, NY 10019	Peter.chaffetz@chaffetzlindsey.com
CMS (Nominees) Ltd.	c/o Pieter Bekker Cannon Place 78 Cannon Street London EC4N 6AF, United Kingdom	pieter.bekker@cms-cmno.com
Cooley LLP	c/o Philip Bowman 55 Hudson Yards, New York, NY 10001	pbowman@cooley.com
David Hu	c/o Howard Schiffman & Jason T. Mitchell Schulte Roth & Zabel LLP 901 Fifteenth St., NW Suite 800 Washington, D.C. 20005	howard.schiffman@srz.com; jason.mitchell@srz.com

20-10666-mew

Doc 5-3

Filed 03/02/20

Page 1 of 6

Entered 03/02/20 13:54:36

Exhibit C

Employees	c/o Adam C. Ford Ford O'Brien LLP 575 Fifth Ave., 17th Fl. New York, NY 10017	aford@fordobrien.com
Employees 1 & 2	c/o Marc Dennis Powers Baker & Hostetler LLP (NYC) 45 Rockefeller Plaza New York, NY 10111	mpowers@bakerlaw.com
Ganado Advocates	c/o Dr. Conrad Portanier 171 Old Bakery Street Valletta VLT 1455, Malta	cportanier@ganadoadvocates.com
Girobank International N.V.	c/o Connie Boland Thompson Hine LLP 335 Madison Avenue, 12th floor New York, NY 10017	Connie.Boland@ThompsonHine.com
Girobank N.V.	c/o Connie Boland Thompson Hine LLP 335 Madison Avenue, 12th floor New York, NY 10017	Connie.Boland@ThompsonHine.com
IIG Bank (Malta) Ltd.	c/o Ralph Siciliano & Carl Regelman Syracuse & Hirschtritt LLP 900 Third Avenue New York, NY 10022	siciliano@thsh.com regelman@tshs.com
IIG Capital LLC	c/o Derek Adler Hughes Hubbard & Reed LLP (NY) One Battery Park Plaza New York, NY 10004	derek.adler@hughesbbard.com

20-10668-mew Doc 5-3 Filed 03/02/20 Entered 03/02/20 13:54:36 Exhibit C

IIG Global Trade Finance Fund Ltd.	c/o Christopher Kennedy & Alexander Lawson Alvarez & Marsal Cayman Islands Ltd. Flagship Bldg., PO Box 2507, 2nd Fl., 70 Harbour Dr. Cayman Islands KY1-1104 c/o John A Pintarelli Morrison & Forester LLP 250 West 55 th Street, New York, NY 10019	chris.kennedy@alvarezandmarsal.com alawson@alvarezandmarsal.com jpintarelli@mofocom
IIG Structured Trade Finance Fund Ltd.	c/o Arthur Jakoby, Esq. Herrick Feinstein LLP Two Park Avenue New York, NY 10016	ajakoby@herrick.com
IIG TOF B.V.	c/o Robin A. van Bokhorst STVB 888 7th Avenue, 29th Fl. New York, NY 10106	
The International Investment Group LLC	c/o Hannah Miller Hughes Hubbard & Reed LLP (NY) One Battery Park Plaza New York, NY 10004	hannah.miller@hugheshubbard.com
LAM Enhanced Trade Finance Fund L.P.	c/o D. Farrington Yates Kobre & Kim LLP 800 Third Avenue New York, NY 10022	farrington.yates@kobrekim.com
Maples Group	c/o Wendy Ebanks Hall Cricket Square Grand Cayman, KY1-1102, Cayman Islands	wendy.ebanks@maples.com
Martin Silver	c/o Seth Taube & Andrew Behrman Baker Botts LLP 30 Rockefeller Plaza New York, NY 10112	seth.taube@bakerbotts.com; andrew.behrman@bakerbotts.com

20-10666-mew Doc 5-3 Filed 03/02/20 Entered 03/02/20 13:54:36 Exhibit C

Office of the United States Trustee	c/o Andy Velez Rivera U.S. Federal Office Building 201 Varick Street, Suite 1006 New York, NY 10014	
Trade Finance Trust c/o Deutsche Bank Trust Company Delaware	c/o Gloria Neuland 1011 Centre Road, Suite 200 Manhattan Beach, CA	
TriLinc Global Impact Fund, LLC	c/o Joel Haims Morrison Foerster 250 W. 55th Street New York, NY 10019	jhaims@mofo.com
Scott Steinberg	25 Franklin Blvd., Apt. 1A Long Beach, NY 11561	ssteinberg@saslawfirm.net
TOF Cayman SPV	c/o Robin A. van Bokhorst STVB 888 7th Avenue, 29th Fl. New York, NY 10106	
U.S. Securities & Exchange Commission	200 Vesey Street, Suite 400 New York, NY 10281	fortinop@sec.gov greenwoodl@sec.gov JacobsonN@sec.gov
Sills Cummis & Gross P.C.	c/o Michael Leichtling 101 Park Avenue, 28th Floor New York, NY 10178	mleichtling@sillscummis.com
StvB	c/o Robin van Bokhorst 888 7th Avenue, 29th Floor New York, NY 10106	stvb.newyork@stvb.com
TCS Law Firm	c/o Tom Sima 275 Madison Ave #14 New York, NY 10016	tom@tsima.com

20-10666-mew Doc 5-3 Filed 03/02/20 Entered 03/02/20 13:54:36 Exhibit C

Triple A Attorneys	c/o Eric Bokkes Trias Building 19 Hanchi Snoa, Willemstad, Curacao	bokkes@tripleattorneys.com
--------------------	---	----------------------------

20-10666-mew Doc 5-3 Filed 03/02/20 Entered 03/02/20 13:54:36 Exhibit C
6 of 6