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Counsel to the Foreign Representatives

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

In re:

Three Arrows Capital, Ltd,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 ()

**MOTION FOR ENTRY OF AN ORDER SCHEDULING A
HEARING ON CHAPTER 15 PETITION FOR RECOGNITION AND RELATED
RELIEF AND SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives (the “Foreign Representatives”) of Three Arrows Capital, Ltd (the “Debtor”), which is the subject of insolvency proceedings (the “BVI Proceeding”) currently pending in the British Virgin Islands (“BVI”) before the Eastern Caribbean Supreme Court in the High Court of Justice Virgin Islands (Commercial Division) (the “BVI Court”) and captioned as

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

In re Three Arrows Capital Limited, Case No. BVIHCOM2022/0119 (June 27, 2022), respectfully state as follows in support of this motion (this “Motion”):

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431 from the U.S. District Court for the Southern District of New York, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this District pursuant to 28 U.S.C. § 1410. The statutory predicates for the relief requested herein are section 1515 of title 11 of the United States Code (the “Bankruptcy Code”) and rules 1007(a)(4), 2002(m), 2002(p), 2002(q) and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

RELIEF REQUESTED

2. The Foreign Representatives respectfully request the entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Notice Order”), (a) scheduling a hearing (the “Hearing”) on July 26, 2022, or as soon as practicable thereafter subject to the Court’s availability, on the relief sought in the *Chapter 15 Petition for Recognition of a Foreign Proceeding* [Docket No. 1] and the *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* [Docket No. 2] (together, the “Petition”),² each filed contemporaneously herewith, (b) setting the deadline by which any responses or objections to the Petition must be received (the “Objection Deadline”), (c) approving the form of the notice of the chapter 15 case, the relief sought in the Petition, the Objection Deadline and the Hearing (the “Notice”) that is attached as Exhibit 1 to the Notice Order, and (d) approving the manner of service of the Notice described herein.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Petition.

BASIS FOR RELIEF

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

3. 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] at least 21 days' notice by mail of the hearing

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.

4. In accordance with Bankruptcy Rule 2002(q), the Foreign Representatives propose to serve the Notice and the Petition (without exhibits) (together, the “Notice Documents”) by first class mail on: (a) the United States Trustee for the Southern District of New York; (b) the Securities and Exchange Commission; (c) all known creditors of the Debtor; (d) all parties that have filed a notice of appearance in this chapter 15 case; and (e) all parties required to be given notice under Bankruptcy Rule 2002(q)(1) of which the Foreign Representatives are aware (collectively, the “Notice Parties”).³ Notwithstanding the foregoing, if the Foreign Representatives do not have a physical address for any of the above Notice Parties, the Foreign Representatives shall provide the Notice Documents via email instead of first class mail to the extent the Foreign Representatives have email addresses for such Notice Parties. In addition, the

³ If any party files a notice of appearance in this chapter 15 case, the Foreign Representatives will serve the Notice and any subsequent notices on that party within three business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel).

Foreign Representatives propose to publish the Notice on their website at <https://3acliquidation.com/>.

5. The Notice will notify the Notice Parties of the commencement of the Debtor'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 website maintained by the federal judiciary where interested parties may view all pleadings filed in this chapter 15 case and a contact person from whom any interested party may obtain copies of the pleadings.

6. Because some of the Notice Parties may have foreign addresses, Bankruptcy Rule 2002(p) may be applicable. Bankruptcy Rule 2002(p) provides that the Office of the United States Trustee, a party in interest, or the Court may determine that supplemental notice is appropriate to ensure that parties with foreign addresses receive sufficient notice in a bankruptcy case. The Foreign Representatives believe that supplementing the notice required by the Bankruptcy Rules by posting the Notice on the Foreign Representative's website will ensure 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 Foreign Representatives submit 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 all parties, including those with foreign addresses. Accordingly, the Foreign Representatives respectfully request that the Court approve the form and manner of service of the Notice for the Notice Parties.

B. Section 1514(c) of the Bankruptcy Code Is Not Applicable to this Case

8. Section 1514(c) of the Bankruptcy Code 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). Given that this is an ancillary case under chapter 15 and creditors will not be filing proofs of claim in this chapter 15 case, the Foreign Representatives submit that section 1514 is inapplicable here. As explained in Collier on Bankruptcy, that section is the “last in a series of sections dealing with the international aspects of cases under chapters *other than chapter 15* that began with section 1511.” 8 Collier on Bankruptcy ¶ 1514.01 (Alan N. Resnick & Henry J. Sommer eds., 16th ed.) (emphasis added). To the extent section 1514(c) applies, the Foreign Representatives respectfully request that the requirements contained therein be waived.

NOTICE

9. Notice of this Motion will be provided to (a) the United States Trustee for the Southern District of New York; (b) the Securities and Exchange Commission; (c) all known creditors of the Debtor; (d) all parties that have filed a notice of appearance in this chapter 15 case; and (e) all parties required to be given notice under Bankruptcy Rule 2002(q)(1) of which the Foreign Representatives are aware. Information concerning the BVI Proceeding and a copy of the Notice is available for review, free-of-charge, on the website maintained by the Foreign Representatives: <https://3acliqliquidation.com/>. The Foreign Representatives submit that no other or further notice of this Motion is necessary or required.

NO PRIOR REQUEST

10. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Foreign Representatives respectfully request that the Court (a) enter the Notice Order granting the relief requested herein and (b) grant such other and further relief as is just and proper.

Dated: July 1, 2022
New York, New York

Respectfully submitted,

/s/ Adam J. Goldberg

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Counsel to the Foreign Representatives

Exhibit A

Notice Order

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

In re:

Three Arrows Capital, Ltd,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 ()

**ORDER SCHEDULING HEARING ON CHAPTER 15 PETITION AND RELATED
RELIEF AND SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

Upon consideration of the motion (the “Motion”)² of Russell Crumpler and Christopher Farmer, in their joint capacities as Foreign Representatives of the Debtor in respect of the BVI Proceeding, requesting entry of an order (i) setting the date for the hearing to consider the relief sought in the Petition (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 the chapter 15 case, the relief sought in the Petition, the Objection Deadline, and the Hearing that is attached hereto as **Exhibit 1** (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 M-431 of the U.S. District Court for the Southern District of New York, dated January 31, 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)(2); and venue of this proceeding being proper before the Court pursuant to 28 U.S.C. § 1410(1); and the Court

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

having determined that the relief requested in the Motion is necessary and beneficial to the Debtor;
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 the 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 _____, 2022 at __:__.m. (prevailing Eastern Time).
3. In accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.), a copy of which may be viewed on the Court's website at <http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>, the Hearing will be conducted telephonically unless otherwise ordered by the Court. Any parties wishing to participate must do so telephonically by making arrangements through [Zoom/CourtSolutions LLC (<http://www.court-solutions.com>)].
4. The form of Notice attached hereto as **Exhibit 1** is approved.
5. Prior to serving the Notice or causing it to be served, the Foreign Representatives 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 Representatives deem necessary or appropriate.
6. Copies of the Notice Documents shall be served by email or first class mail upon:
(a) the United States Trustee for the Southern District of New York; (b) the Securities and Exchange Commission; (c) all known creditors of the Debtor; (d) all parties that have filed a notice of appearance in this chapter 15 case; and (e) all parties required to be given notice under

Bankruptcy Rule 2002(q)(1) of which the Foreign Representatives are aware (collectively, the “Notice Parties”).

7. Copies of the Notice Documents shall be published on the Foreign Representative’s website, located at <https://3acliqliquidation.com/>.

8. 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 waived.

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

10. 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.

11. 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 the Debtor. 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 Representatives, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn.: Adam J. Goldberg, Brett M. Neve, Nacif Taousse, and Brian S. Rosen), and Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, CA 90071 (Attn.: Daniel Scott Schechter, Nima H. Mohebbi, and Caitlin J. Campbell), so as to be actually received on or before _____, 2022 at __:__ __.m. (prevailing Eastern Time).

12. Service of the Notice Documents in accordance with this Order is 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.

13. The Foreign Representatives are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

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

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

Dated: _____, 2022
New York, New York

THE HONORABLE _____
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1 to Order

Notice

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

In re:

Three Arrows Capital, Ltd,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 ()

**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 July 1, 2022, Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives (the “Foreign Representatives”) of Three Arrows Capital, Ltd (the “Debtor”),² filed the *Chapter 15 Petition for Recognition of a Foreign Proceeding* [Docket No. 1] and the *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* [Docket No. 2] (collectively, the “Petition”)³ 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 Representatives seek the entry of an order (a) finding that (i) the Debtor is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the BVI Proceeding is a “foreign main proceeding” within the meaning of section 1502 of the Bankruptcy Code or, alternatively, a “foreign nonmain proceeding” within the meaning of section 1502 of the Bankruptcy Code, (iii) the Foreign Representatives satisfy the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, and (iv) the Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code; (b) granting recognition of the BVI Proceeding as a “foreign main proceeding” under sections 1517 and 1520 of the Bankruptcy Code; (c) granting all relief afforded to foreign main proceedings under section 1520 of the Bankruptcy Code; (d) pursuant to section 1521(a), (i) staying the commencement or continuation of proceedings concerning the Debtor’s assets, rights, obligations or liabilities, to the extent not stayed automatically under section 1520(a); (ii) staying all parties from executing against, interfering with or otherwise disposing of the Debtor’s assets, to the extent not stayed automatically under section 1520; (iii) providing that the Liquidation Order issued by the BVI Court is recognized, granted comity, and entitled to full force and effect in accordance

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

² The Debtor is the subject of insolvency proceedings (the “BVI Proceeding”) currently pending before the Eastern Caribbean Supreme Court in the High Court of Justice Virgin Islands (Commercial Division) (the “BVI Court”) captioned as *In re Three Arrows Capital Limited*, Case No. BVIHCOM2022/0119 (June 27, 2022).

³ Capitalized terms shall have the same meanings ascribed to them in the Petition.

with its terms, and that such terms shall be binding and fully enforceable in the United States; and (iv) entrusting the Foreign Representatives with the administration or realization of all of the Debtor's assets that are located within the territorial jurisdiction of the United States, including prosecution of any causes of action belonging to the Debtor; and (e) waiving the 14-day stay of effectiveness of the Proposed Order; and granting related relief.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing (the "Hearing") to consider the relief requested in the Petition for __: __ __.m. (**prevailing Eastern Time**) on _____, 2022 in Room ____ of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

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

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Information concerning the BVI Proceeding and a copy of the Notice is available for review, free-of-charge, on the website maintained by the Foreign Representatives: <https://3acliqliquidation.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 the Debtor. 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 Representatives, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn.: Adam J. Goldberg, Brett M. Neve, Nacif Taousse, and Brian S. Rosen), and Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, CA 90071 (Attn.: Daniel Scott Schecter, Nima H. Mohebbi, and Caitlin J. Campbell), so as to be actually received on or before _____, 2022 at __: __.m. (prevailing 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 case.

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.

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Dated: July 1, 2022
New York, New York

Respectfully submitted,

/s/ Adam J. Goldberg

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