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

In re

MARKEL CATCO REINSURANCE FUND
LTD., *et al.*,

Debtors in Foreign Proceedings.¹

Chapter 15

Case No. 21-11733 (LGB)

(Joint Administration Requested)

¹ The Debtors are Bermuda companies registered with the Registrar of Companies in Bermuda. The Debtors' respective registration numbers are as follows: Markel CATCo Reinsurance Fund Ltd. (50599); CATCo Reinsurance Opportunities Fund Ltd. (44855); Markel CATCo Investment Management Ltd. (50576); Markel CATCo Re Ltd. (50602). Each of the Debtors has its registered office located at Crawford House, 50 Cedar Avenue, Hamilton HM11, Bermuda.

**MOTION FOR ENTRY OF AN ORDER
(I) SCHEDULING RECOGNITION HEARING AND
(II) SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE OF THE NOTICE
DOCUMENTS AND OTHER DOCUMENTS FILED IN THE CHAPTER 15 CASES**

Simon Appell of AlixPartners UK LLP (“**AlixPartners**”) and John C. McKenna of Finance & Risk Services Ltd., in their capacities as the joint provisional liquidators and authorized foreign representatives (in such capacities, the “**JPLs**” or the “**Foreign Representatives**”) of the above-captioned foreign debtors (collectively, the “**Debtors**”) seeking recognition of liquidation proceedings (the “**Provisional Liquidation Proceedings**”) under Part XIII of the Companies Act 1981 (as amended, the “**Bermuda Companies Act**”), currently pending before the Supreme Court of Bermuda (the “**Bermuda Court**”), and proposed reorganization proceedings concerning schemes of arrangement under section 99 of the Bermuda Companies Act (the “**Schemes**”) that will be filed before the Bermuda Court (the “**Scheme Proceedings**,” and together with the Provisional Liquidation Proceedings, the “**Bermuda Proceedings**”), by and through their undersigned counsel, respectfully submit this motion (this “**Motion**”) and represent as follows:

RELIEF REQUESTED

1. Through this Motion, the Foreign Representatives request entry of an order substantially in the form attached as **Exhibit A** hereto (the “**Proposed Order**”): (a) scheduling a date for the hearing (the “**Recognition Hearing**”) on the relief sought in the *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representatives, and (III) Certain Related Relief* (the “**Verified Petition**”),² on November 4, 2021, or as soon thereafter as the Court’s calendar permits, (b) setting 4:00 p.m. (prevailing Eastern Time) on the date that is

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Verified Petition, filed contemporaneously herewith.

seven days prior to the Recognition Hearing, as the deadline by which any responses or objections to the Verified Petition must be received (the “**Objection Deadline**”), and (c) approving the notice and service procedures (the “**Notice Procedures**”) for the (i) Notice Documents (as defined below), including the notice of the Recognition Hearing and the Objection Deadline substantially in the form attached to the Proposed Order as **Exhibit 1** (the “**Hearing Notice**”), and (ii) other documents filed in the above-captioned cases.

JURISDICTION AND VENUE

2. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.). This matter is a core proceeding under 28 U.S.C. § 157(b)(2)(P). Venue is proper under 28 U.S.C. § 1410.

3. These chapter 15 cases (the “**Chapter 15 Cases**”) have been properly commenced pursuant to section 1504 of title 11 of the United States Code (the “**Bankruptcy Code**”) by the filing of voluntary petitions for relief for recognition of the Bermuda Proceedings under Bankruptcy Code section 1515 on behalf of the Debtors (the “**Chapter 15 Petitions**”).

4. The legal predicates for the relief requested herein are Bankruptcy Code sections 1504, 1509, 1515, and 1517, rules 2002(l), 2002(m), 2002(p), 2002(q), and 9007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 2002-4 and 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Bankruptcy Rules**”).

BACKGROUND

5. On September 27, 2021, the Debtors commenced the Provisional Liquidation Proceedings by filing winding-up petitions (the “**Winding-Up Petitions**”) with the Bermuda Court

seeking the appointment of the JPLs as joint and several provisional liquidators of the Debtors with limited “light-touch powers.”

6. On the date hereof (the “**Petition Date**”), the Foreign Representatives filed the Chapter 15 Petitions. A description of the Debtors’ business and the events leading up to the commencement of the Bermuda Proceedings and the Chapter 15 Cases is included in (a) the Verified Petition; (b) the *Declaration of Simon Appell in Support of the Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representatives, and (III) Certain Related Relief* (the “**Appell Declaration**”); and (c) the *Declaration of Kehinde George in Support of the Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representatives, and (III) Certain Related Relief* (the “**George Declaration**”), each filed contemporaneously herewith and incorporated herein by reference.

BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY

I. The Proposed Notice Procedures and Hearing Date Are Adequate and Are Permitted by the Bankruptcy Rules.

7. The Bankruptcy Code provides that “[a] petition for recognition of a foreign proceeding shall be decided at the earliest possible time.” Bankruptcy Code § 1517(c). In furtherance thereof, the Bankruptcy Rules state that: “After the filing of a petition for recognition of a foreign proceeding, the court shall promptly schedule and hold a hearing on the motion.” Fed. R. Bankr. P. 2002(q)(1).

8. Bankruptcy Rule 2002(q)(1) goes on to provide that the parties identified therein must be given at least 21-days’ notice of a hearing to consider the petition for recognition of a foreign proceeding. Bankruptcy Rules 2002(m) and 9007 provide, among other things, that when notice is to be given under the Bankruptcy Rules, the Court shall designate the form and manner

in which such notice shall be given (unless otherwise specified in the Bankruptcy Rules). Further, Local Bankruptcy Rule 9013-1(b) provides that “[i]n addition to all entities otherwise entitled to receive notice, notice of a motion shall be given to any entity believed to have or be claiming an interest in the subject matter of the proposed order or who, it is believed, otherwise would be affected by the proposed order.” LBR 9013-1(b).

9. Pursuant to Bankruptcy Rules 2002(m) and (q) and Local Bankruptcy Rule 9013-1(b), the Foreign Representatives propose the following Notice Procedures: the Foreign Representatives propose to serve (a) this Motion (including the proposed form of order annexed thereto), (b) the *Motion for Entry of an Order (I) Directing Joint Administration of the Debtors’ Chapter 15 Cases and (II) Authorizing the Foreign Representatives to File Consolidated Lists of Information* (including the proposed form of order annexed thereto), (c) the Hearing Notice, (d) the Chapter 15 Petitions, (e) the Verified Petition (including the proposed form of order annexed thereto), (f) the Appell Declaration, and (g) the George Declaration (collectively, the “**Notice Documents**”) by electronic mail, to the extent email addresses are available, and otherwise by mail upon (i) the Debtors, (ii) the Foreign Representatives, (iii) all entities against whom provisional relief is being sought under Bankruptcy Code section 1519, (iv) all parties to litigation pending in the United States in which any Debtor is a party at the time of the filing of the Chapter 15 Petitions, (v) the Office of the United States Trustee for the Southern District of New York (the “**U.S. Trustee**”), (vi) all parties that request notice as of the date of service, and (vii) all parties the Foreign Representatives believe to be affected by the relief requested in the Notice Documents, in accordance with Bankruptcy Rule 2002(q) and Local Bankruptcy Rule 9013-1 (collectively, the

“**Notice Parties**”).³ In addition, the Foreign Representatives propose to serve the Hearing Notice by mail on all of the Notice Parties (where a mailing address is available). Moreover, the Foreign Representatives will provide the Notice Documents to AlixPartners or its affiliate, with instructions to post the Notice Documents to a website (the “**Case Website**”), which any party-in-interest will be able to access.

10. Bankruptcy Rule 2002(l) permits the Court to “order notice by publication if it finds that notice by mail is impracticable or that it is desirable to supplement the notice.” Fed. R. Bankr. P. 2002(l). Accordingly, the Foreign Representatives will supplement the notice required by the Bankruptcy Rules by causing a form of the Hearing Notice to be published in the national and international editions of the *New York Times* as soon as reasonably practicable following the entry of the Proposed Order. The Foreign Representatives believe that such publication would ensure that sufficient notice of the Chapter 15 Petitions, the Objection Deadline, and the time, date, and place of the Recognition Hearing, is provided to interested persons who might not otherwise receive notice.

11. In addition, if any party files a notice of appearance in the Chapter 15 Cases, the Foreign Representatives propose to serve the Notice Documents upon such party within three business days of the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

12. The Foreign Representatives will also provide courtesy copies of all documents filed in the Chapter 15 Cases to the Court.

³ The Foreign Representatives will provide paper copies of the Notice Documents and any other documents filed by the Foreign Representatives in these Chapter 15 Cases to any Notice Parties or any other parties-in-interest upon request to counsel to the Foreign Representatives.

13. The Foreign Representatives further propose to follow the foregoing Notice Procedures with respect to any other pleadings, notices, or other documents they file in the Chapter 15 Cases.

14. The Foreign Representatives submit that the Notice Procedures requested herein constitute adequate and sufficient notice of the commencement of the Chapter 15 Cases, the relief sought in the Verified Petition, and relief sought pursuant to any other pleadings filed in the Chapter 15 Cases. Accordingly, the Foreign Representatives respectfully request that the Court approve the foregoing manner of service of the Notice Documents.

II. The Proposed Recognition Hearing Date, Objection Deadline, and Notice Thereof Are Appropriate.

15. Bankruptcy Rule 1012(b) provides, among other things, that a party objecting to a chapter 15 petition must present such objection no later than seven days before the date set for the hearing on the petition, unless otherwise ordered by the court. In light of this requirement, the Foreign Representatives submit that setting (a) November 4, 2021 (or a date as soon thereafter as the Court's calendar permits) as the Recognition Hearing date and (b) a date seven days prior to the Recognition Hearing date at 4:00 p.m. (prevailing Eastern Time) as the Objection Deadline, is appropriate.

16. As described in the Verified Petition, the Appell Declaration, and the George Declaration, implementation of the proposed restructuring will require several conditions to be met and contemplates that Bermuda Proceedings be recognized under chapter 15 of the Bankruptcy Code and given full force and effect in the United States by an order of the Court. To that end, the Foreign Representatives respectfully request that the Recognition Hearing be held as soon as possible following commencement of these Chapter 15 Cases to avoid any delays in the consummation of the proposed restructuring.

17. Pursuant to Local Bankruptcy Rule 9014-2, the Foreign Representatives request that the Recognition Hearing be an evidentiary hearing at which witnesses may testify.

III. The Requirements of Bankruptcy Code Section 1514(c) Should Be Waived.

18. Bankruptcy Code section 1514(c) provides that when notice of the commencement of a case is to be given to foreign creditors, such notice shall, among other things, indicate the time period for filing proofs of claim, specify the place for filing such proofs of claim, and indicate whether secured creditors need to file proofs of claim. The Foreign Representatives submit, however, that section 1514 only applies in plenary cases and does not apply in the context of a chapter 15 case. *See* 8 Collier on Bankruptcy ¶ 1514.01 (16th ed. 2020) (“Section 1514 is last in a series of sections beginning with section 1511 and dealing with the international aspects of cases under chapters other than chapter 15.”). Accordingly, the Foreign Representatives respectfully request that, to the extent applicable, the requirements contained therein be waived in this instance. Courts in this district have regularly granted this request. *See, e.g., In re Digicel Group One Ltd (In Provisional Liquidation)*, No. 20-11207 (SCC) (Bankr. S.D.N.Y. May 15, 2020); *In re Olinda Star Ltd (In Provisional Liquidation)*, No. 20-10712 (MG) (Bankr. S.D.N.Y. Mar. 10, 2020); *In re Perforadora Oro Negro, S. De R.L. De C.V., et al.*, No. 18-11094 (SCC) (Bankr. S.D.N.Y. Apr. 20, 2018); *In re Avanti Communications Grp. Plc.*, No. 18-10458 (MG) (Bankr. S.D.N.Y. Feb. 26, 2018); *In re U.S. Steel Canada Inc.*, No. 17-11519 (MG) (Bankr. S.D.N.Y. June 02, 2017).

NOTICE

19. Notice of this Motion will be provided to: (a) the Debtors, (b) the Office of the United States Trustee for the Southern District of New York, (c) the Notice Parties and any other parties entitled to notice under Bankruptcy Rule 2002(q)(1), (d) all other parties that request notice in these cases pursuant to Bankruptcy Rule 2002 prior to the date of such service, (e) all parties

the Foreign Representatives believe to be affected by the Relief Requested pursuant to Local Bankruptcy Rule 9013-1, and (f) all other parties that this Court may direct. The Foreign Representatives submit that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

NO PRIOR REQUEST

20. No previous request for the relief requested herein has been made to this or any other Court.

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CONCLUSION

WHEREFORE, the Foreign Representatives respectfully request that the Court enter the Proposed Order, substantially in the form annexed hereto, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: October 5, 2021
New York, New York

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& FLOM LLP

/s/ Lisa Laukitis

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Counsel to the Foreign Representatives

EXHIBIT A

Proposed Order

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

In re

MARKEL CATCO REINSURANCE FUND
LTD., *et al.*,

Debtors in Foreign Proceedings.¹

Chapter 15

Case No. 21-11733 (LGB)

(Jointly Administered)

**ORDER (I) SCHEDULING RECOGNITION HEARING AND
(II) SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE OF THE NOTICE
DOCUMENTS AND OTHER DOCUMENTS FILED IN THE CHAPTER 15 CASES**

Upon the motion (the “**Motion**”)² of the Foreign Representatives of the above-captioned Debtors, for entry of an order (a) scheduling the Recognition Hearing, (b) setting the Objection Deadline, and (c) specifying the form and manner of service of notice, including the form of the Hearing Notice; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. § 1410; and adequate and sufficient notice of the filing of the Motion having been given by the Foreign Representatives under the circumstances; and it appearing that no other or further notice need be provided; and it appearing that the relief sought in the Motion is necessary and beneficial to the Debtors; and after due deliberation and sufficient cause appearing therefor; it hereby

¹ The Debtors are Bermuda companies registered with the Registrar of Companies in Bermuda. The Debtors’ respective registration numbers are as follows: Markel CATCo Reinsurance Fund Ltd. (50599); CATCo Reinsurance Opportunities Fund Ltd. (44855); Markel CATCo Investment Management Ltd. (50576); Markel CATCo Re Ltd. (50602). Each of the Debtors has its registered office located at Crawford House, 50 Cedar Avenue, Hamilton HM11, Bermuda.

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

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Recognition Hearing shall be held before the Court on November 4, 2021, at 10:00 a.m. (prevailing Eastern Time) before the Honorable Lisa G. Beckerman, of the United States Bankruptcy Court for the Southern District of New York.
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 www.nysb.uscourts.gov), the Recognition Hearing will be conducted virtually unless otherwise ordered by the Court.
4. Any response or objection to the Verified Petition must be made in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, in a writing that sets forth the basis for such objection with specificity. Any such objection must be filed electronically with the Court on the Court's electronic filing system in accordance with and except as provided in General Order M-399 (a copy of which may be viewed on the Court's website at www.nysb.uscourts.gov) and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means, and served upon (i) the Foreign Representatives' counsel, Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001 (Attn: Lisa Laukitis) *and* 155 N. Wacker Drive, Chicago, Illinois 60606 (Attn: Justin M. Winerman and Anthony R. Joseph) *and* Skadden, Arps, Slate, Meagher & Flom (UK) LLP, 40 Bank Street, Canary Wharf, London, E14 5DS (Attn: Peter Newman); and (ii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, so as to be **received by 4:00 p.m. (prevailing Eastern Time) on October 28, 2021** (the "**Objection Deadline**"), with a courtesy copy served upon the Chambers of the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

5. If no response or objection is timely filed and served as provided above, the Court may grant the relief requested by the Foreign Representatives without further notice or hearing.

6. The Foreign Representatives may file a reply to any objections thereto by noon on the day before the Recognition Hearing.

7. The Recognition Hearing may be adjourned from time to time without further notice other than a notice of adjournment on the docket in the Chapter 15 Cases or an announcement in open court of the adjourned date or dates of any further adjourned hearing.

8. The Recognition Hearing shall be a final and evidentiary hearing at which witnesses may testify.

9. The Notice Procedures set forth in the Motion constitute due and sufficient notice of the Notice Documents and any other documents filed in the Chapter 15 Cases, and are hereby approved.

10. The form of Hearing Notice, substantially in the form attached hereto as **Exhibit 1**, is hereby approved. The Foreign Representatives may fill in any missing dates and other information as ordered by the Court, 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 to the form of Hearing Notice as the Foreign Representatives deem necessary or appropriate.

11. Copies of the Notice Documents shall be served upon the Notice Parties in the manner set forth in the Motion within three business days following entry of this order.

12. If any party files a notice of appearance in the Chapter 15 Cases, the Foreign Representatives shall serve a copy of the Notice on such party or its counsel within three business

days following the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

13. The Foreign Representatives shall cause the Hearing Notice to be published in the national and international editions of the *New York Times* as soon as practicable following the entry of this order.

14. The notice requirements set forth in Bankruptcy Code section 1514(c) are inapplicable in the context of these cases, or, to the extent applicable, are hereby waived.

15. Service pursuant to this order shall constitute good and sufficient service and adequate notice of the Recognition Hearing under Bankruptcy Rule 2002(q) and the Notice Documents.

16. The Foreign Representatives are authorized and empowered to take all actions necessary to implement the relief granted in this order.

17. The terms and conditions of this order shall be immediately effective and enforceable upon its entry.

18. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this order.

Dated: New York, New York

_____, 2021

HON. LISA G. BECKERMAN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Notice

SKADDEN, ARPS, SLATE, MEAGHER &
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Counsel to the Foreign Representatives

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

In re

MARKEL CATCO REINSURANCE FUND
LTD., *et al.*,

Debtors in Foreign Proceedings.¹

Chapter 15

Case No. 21-11733 (LGB)

(Jointly Administered)

**NOTICE OF FILING AND HEARING ON THE VERIFIED PETITION FOR
(I) RECOGNITION OF FOREIGN MAIN PROCEEDINGS, (II) RECOGNITION
OF FOREIGN REPRESENTATIVES, AND (III) CERTAIN RELATED RELIEF**

¹ The Debtors are Bermuda companies registered with the Registrar of Companies in Bermuda. The Debtors' respective registration numbers are as follows: Markel CATCo Reinsurance Fund Ltd. (50599); CATCo Reinsurance Opportunities Fund Ltd. (44855); Markel CATCo Investment Management Ltd. (50576); Markel CATCo Re Ltd. (50602). Each of the Debtors has its registered office located at Crawford House, 50 Cedar Avenue, Hamilton HM11, Bermuda.

PLEASE TAKE NOTICE that on October 5, 2021, Simon Appell of AlixPartners UK LLP and John C. McKenna of Finance & Risk Services Ltd., in their capacities as the joint provisional liquidators and as the authorized foreign representatives (in such capacities, the “**JPLs**” or the “**Foreign Representatives**”) of the above-captioned foreign debtors (the “**Debtors**”), seeking recognition of liquidation proceedings (the “**Provisional Liquidation Proceedings**”) under Part XIII of the Companies Act 1981 (the “**Bermuda Companies Act**”), currently pending before the Supreme Court of Bermuda (the “**Bermuda Court**”), and proposed reorganization proceedings concerning schemes of arrangement under section 99 of the Bermuda Companies Act (the “**Schemes**”) that will be filed before the Bermuda Court (the “**Scheme Proceedings**,” and together with the Provisional Liquidation Proceedings, the “**Bermuda Proceedings**”), filed the *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representatives, and (III) Certain Related Relief* (the “**Verified Petition**”)¹ for relief under chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”) for the Debtors with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Verified Petition requests entry of an order recognizing the Bermuda Proceedings as foreign main proceedings pursuant to Bankruptcy Code section 1517; recognizing each of the Foreign Representatives as a “foreign representative” as defined in Bankruptcy Code section 101(24); and granting related relief.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled an evidentiary hearing to consider the relief requested in the Verified Petition for November 4, 2021, at 10:00 a.m. (prevailing Eastern Time) (the “**Recognition Hearing**”) before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 601, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy Rule 2002-4, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the chapter 15 cases.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing will be conducted remotely using Zoom for Government. Any parties wishing to appear at the Recognition Hearing, whether in a “live” or “listen only” capacity, must make an electronic appearance through the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl> **on or before 4:00 p.m. (Prevailing Eastern Time) the business day before the Recognition Hearing.** After the deadline for parties to make electronic appearances has passed, parties who have made their electronic appearance through the Court’s website will receive an invitation from the Court with a Zoom for Government link that will allow them to attend the Recognition Hearing. Requests to receive a Zoom for Government link should not be emailed to the Court, and the Court will not respond to late requests that are submitted on the day of the hearing. Further information on the

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Verified Petition.

use of Zoom for Government can be found at the Court's website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that any objection to the Verified Petition must be made in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, in a writing that sets forth the basis for such objection with specificity. Any such objection must be filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 (a copy of which may be viewed on the Court's website at www.nysb.uscourts.gov) and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means, and served upon (i) the Foreign Representatives' counsel, Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001 (Attn: Lisa Laukitis) *and* 155 N. Wacker Drive, Chicago, Illinois 60606 (Attn: Justin M. Winerman and Anthony R. Joseph) *and* Skadden, Arps, Slate, Meagher & Flom (UK) LLP, 40 Bank Street, Canary Wharf, London, E14 5DS (Attn: Peter Newman); and (ii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, so as to be **received by 4:00 p.m. (prevailing Eastern Time) on October 28, 2021**, with a courtesy copy served upon the Chambers of the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

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

PLEASE TAKE FURTHER NOTICE that all parties in interest opposing the Verified Petition or the relief requested therein must attend the Recognition Hearing.

PLEASE TAKE FURTHER NOTICE that the Recognition 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.

PLEASE TAKE FURTHER NOTICE that it is anticipated that the Court may communicate directly with, or request information or assistance directly from, the Bermuda Court or the Foreign Representatives pursuant to Bankruptcy Code section 1525.

PLEASE TAKE FURTHER NOTICE that, if you are receiving this notice in your capacity as a nominee or custodian on behalf of a holder of interests in shares in any of the Debtors, you should promptly forward a copy of this notice and any other materials received in connection with the Chapter 15 Cases to all persons on whose behalf you hold an interest. If you are receiving this notice but have assigned, sold, or otherwise transferred, or assign, sell, or otherwise transfer your interests in shares in any of the Debtors, you should promptly forward a copy of this notice and any other materials received in connection with the Chapter 15 Cases to the person or persons to whom you have assigned, sold or otherwise transferred, or assign, sell, or otherwise transfer, your interests.

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition and all other documents filed in this case can be accessed from the Court's website, <http://ecf.nysb.uscourts.gov> (a PACER login and password are required to retrieve documents), free of charge by visiting the Case Website at <https://catcobuyout.alixpartners.com>, or upon request to counsel to the Foreign Representatives.

Dated: _____, 2021
New York, New York

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