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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.<sup>1</sup>

Chapter 15

Case No. 21-11733 (LGB)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO  
FINAL REPORT AND PROPOSED ORDER TO CLOSE THE CHAPTER 15 CASES**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the  
Southern District of New York (the “**Local Rules**”), the undersigned hereby certifies as follows:

<sup>1</sup> 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.

1. On June 9, 2022, 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**”), filed the *Final Report and Proposed Order to Close the Chapter 15 Cases* [Docket No. 43] (the “**Final Report and Case Closing Motion**”).

2. The Foreign Representatives served the Final Report and Case Closing Motion by email on June 9, 2022, as reflected in the certificate of service filed at Docket No. 44.

3. A hearing on the Final Report and Case Closing Motion was set for July 12, 2022. Local Rule 9075-2 provides that pleadings may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the attorney for the entity that files the motion complies with the relevant procedural and notice requirements.

4. The deadline for receipt of objections to the Final Report and Case Closing Motion, which was July 5, 2022, at 4:00 p.m. (the “**Objection Deadline**”), has passed, and, to the best of my knowledge, no objection, other responsive pleading, or request for hearing with respect to the Final Report and Case Closing Motion has been (a) filed with the Court on the docket of the above-captioned cases or (b) served on the Foreign Representatives or their counsel.

5. In accordance with Local Rule 9075-2, this certificate is being filed more than 48 hours after expiration of the Objection Deadline.

6. In addition, it has been more than 30 days since the Final Report and Case Closing Motion was filed and served and no objection has been filed, thus, the Chapter 15 Cases<sup>2</sup> are presumed to be fully administered. *See* Fed. R. Bankr. P. 5009(c).

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Final Report and Case Closing Motion.

7. Accordingly, the Foreign Representatives respectfully request that the Court enter the proposed form of order filed with the Final Report and Case Closing Motion, a copy of which order is attached hereto as **Exhibit A**, granting the relief requested in the Final Report and Case Closing Motion.

Dated: July 11, 2022  
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP

/s/ Lisa Laukitis

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**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.<sup>1</sup>

Chapter 15

Case No. 21-11733 (LGB)

(Jointly Administered)

**ORDER CLOSING CHAPTER 15 CASES**

Upon consideration of the *Final Report and Proposed Order to Close the Chapter 15 Cases* (the “**Final Report**”)<sup>2</sup> and due and sufficient notice of the Final Report having been given; and no objections or responses to the Final Report having been filed; and it appearing that the relief requested in the Final Report is in the best interests of the Debtors and other parties-in-interest in the Chapter 15 Cases; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

**THE COURT HEREBY FINDS AND CONCLUDES THAT:**

A. This Court has jurisdiction to consider the Final Report and the relief requested therein in accordance with 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.

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meaning ascribed to such terms in the Final Report.

B. Appropriate notice of the filing of the Final Report was given, which notice is deemed adequate for all purposes, and no other or further notice need be given.

C. On November 4, 2021, this Court entered an order recognizing the Bermuda Proceedings as foreign main proceedings and granting related relief [Docket No. 23] (the “**Recognition Order**”), including granting comity to all orders entered in the Bermuda Court and giving them full force and effect in the United States and enjoining all entities from, among other things, commencing or continuing an individual action or proceeding concerning Debtors’ assets, rights, obligations, or liabilities to the extent that they have not been stayed pursuant to section 1520(a) of the Bankruptcy Code.

D. On March 16, 2022, this Court entered an order giving full force and effect to the Schemes and providing additional relief in furtherance of the Buy-Out Transaction (the “**Enforcement Order**”), including enforcement of the Releases and the Injunctions in the United States.

E. On March 28, 2022, the completion of the Restructuring (the “**Closing Date**”) occurred.

F. Thirty days have passed since the Foreign Representatives filed their certificate of service in respect of the Final Report, no objections thereto have been filed, and the Chapter 15 Cases are presumed to have been fully administered. For all of the foregoing reasons and after due deliberation and sufficient cause appearing therefor, it is hereby

**ORDERED THAT:**

1. The Chapter 15 Cases have been fully administered and are hereby closed pursuant to sections 350 and 1517(d) of the Bankruptcy Code and Local Rule 5009-2(a), without prejudice

to the right of the Debtors or the Foreign Representatives to seek an order reopening the Chapter 15 Cases under section 350(b) or Local Rule 5009-2(b).

2. Notwithstanding this Order, all prior orders entered in the Chapter 15 Cases shall remain in full force and effect and shall survive following the entry of this Order.

3. This Court shall retain its jurisdiction with respect to its prior orders in the Chapter 15 Cases, including the effect, enforcement, amendment, or modification of this Order, the Recognition Order, and the Enforcement Order, and with respect to the effect and enforcement of the Sanction Orders and the Schemes within the territorial jurisdiction of the United States, and any request for additional relief in or related to the Chapter 15 Cases and any request by an entity for relief from the provisions of this Order, for cause shown, that is properly commenced and within the jurisdiction of this Court.

Dated: \_\_\_\_\_, 2022  
New York, New York

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HON. LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE