# SCHEDULE A TO DEBTOR’S SUBPOENA TO

# WILLIAM K. HARRINGTON, UNITED STATES TRUSTEE FOR REGION 2

INSTRUCTIONS

1. The responses to these Requests for the Production of Documents in accordance with the Debtor’s Subpoena to the Office of the United States Trustee (each a “Request” and collectively the “Requests”) shall include such materials as are within the Office of the U.S. Trustee’s custody, possession or control, or are within the custody, possession or control of its consultants, accountants, attorneys or other agents, or which are otherwise available to it. The Office of the U.S. Trustee is specifically instructed to review the files (both hard copy and electronic), records, computers, notes, correspondence, daily calendars and telephone logs or records of all persons who have knowledge of the information inquired about in the Requests.
2. With respect to any document that the Office of the U.S. Trustee refuses to produce in response to the Requests on the basis of a claim of privilege, or attorney work-product, it must produce a privilege log in compliance with D. Conn. L. Civ. R. 26(e), made applicable to this proceeding by Local Bankruptcy Rule 1001-1(b).
3. Notwithstanding the assertion of any objection to production, any document to which an objection is raised which contains non-objectionable matter that is responsive to a Request must be produced, but that portion of the document as to which the objection is asserted may be withheld or redacted in the first instance provided that the privilege log required by D. Conn. L. Civ. R. 26(e) is furnished.
4. Each document to be produced pursuant to the Requests is to be produced along with all non-identical drafts and copies thereof, in its entirety without abbreviation, expurgation or redaction.
5. Documents shall be produced as they are kept in the usual course of business or, alternatively, shall be organized and labeled to correspond to the specific Request in response to which such documents are produced.
6. Electronically stored information shall be produced in a reasonably usable form or forms as required by Fed. R. Civ. P. 45(a)(C), made applicable to this proceeding by Fed. R. Bankr. P. 9016.
7. The term “all/each” shall both be construed as all and each.
8. The term “and/or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Requests all responses that might otherwise be construed to be outside their scope.
9. The singular form of any word includes the plural and vice versa.
10. The Requests are continuing in nature. The Debtor demands that supplemental and additional productions be made by the Office of the U.S. Trustee immediately after any new or additional responsive documents or information comes into its possession, custody, or control or is otherwise made available to it.
11. If the Office of the U.S. Trustee withholds documents on the basis of an asserted objection other than privilege, it shall affirmatively state that responsive documents are being withheld on the basis of the objection.
12. Unless otherwise specified, the time period covered by these Requests is February 15, 2022 to the present.
13. **DEFINITIONS**
14. Unless otherwise defined herein, all terms used herein shall have the meanings set forth in D. Conn. L. Civ. R. 26(c), made applicable to this proceeding by Local Bankruptcy Rule 1001-1(b).
15. Unless otherwise specified herein, the rules of construction set forth in D. Conn. L. Civ. R. 26(d), made applicable to this proceeding by Local Bankruptcy Rule 1001-1(b), shall apply to the terms used herein.
16. “Bravo Luck” means Bravo Luck Limited.
17. “Debtor” means Ho Wan Kwok, and anyone acting or purporting to act on his behalf.
18. “Despins” means Luc A. Despins, and anyone acting or purporting to act on his behalf.
19. The “Despins Appointment Notice” means the Notice of Appointment of Chapter 11 Trustee dated July 7, 2022 (ECF 514).
20. The “Despins Approval Application” means the Notice of Appointment of Chapter 11 Trustee, dated July 7, 2022 (ECF. No. 515).
21. The “Despins Declaration of Disinterestedness” means the Declaration of Disinterestedness of Luc A. Despins dated July 7, 2022 (ECF 515-1)
22. “Disinterested” shall have the meaning under 11 U.S.C. 101(14) and Fed. R. Bankr. P. 2007(c), Including that a person **not** (1) possess or assert any economic interest that would tend to lessen the value of the bankruptcy estate or that would create either an actual or potential dispute in which the estate is a rival claimant; or (2) possess a predisposition under circumstances that render such a bias against the estate
23. “Paul Hastings” means Paul Hasting, LLP, and includes its members, manager, managing members, employees, agents, and to the extent applicable to a particular request, outside service providers.
24. “PAG Entities” has the meaning ascribed to such term in the July 12, 2022, First Supplemental Declaration of Disinterestedness of Luc A. Despins.
25. “PAX” means Pacific Alliance Asia Opportunity Fund L.P., and anyone acting or purporting to act on its behalf.
26. “State Owned Entity” or “State Owned Entities” means an entity or entities owned or controlled by the government of the People’s Republic of China and is intended to have the same meaning ascribed to such term in the April 7, 2022, Paul Hastings Press Release titled Paul Hastings Represents Chinese Local Government Enterprises in Seven Bond Issuances.
27. “Trustee” or “Chapter 11 Trustee” means the position of Chapter 11 Trustee of the Debtor’s Estate.
28. “UST” means the Office of the United States Trustee, including its employees, agents, and anyone acting or purporting to act on its behalf.
29. “Whitley” means Joe D. Whitley, and anyone acting or purporting to act on his behalf.
30. The “Whitley Appointment Notice” shall mean the Notice of Appointment of Chapter 11 Trustee dated June 30, 2022 (ECF. No. 498).
31. The “Whitley Approval Application” shall mean the Notice of Appointment of Chapter 11 Trustee, dated June 30, 2022 (ECF. No. 498).
32. The “Whitley Appointment Withdrawal” shall mean the Withdrawal of United States Trustee’s Notice of Appointment of Chapter 11 Trustee (ECF 498) and Application for Order Approving Appointment of a Chapter 11 Trustee (ECF 499), dated July 5, 2022 (ECF 507).
33. “Womble Bond Dickinson” means the network of member firms of Womble Bond Dickinson (International) Limited, Including Womble Bond Dickinson (UK) LLP and Womble Bond Dickinson (US) LLP.
34. **REQUESTS FOR PRODUCTION**
35. All Documents and Communications Concerning the UST’s decision to appoint Whitley as Trustee, Including Communications between the UST and any of the following Concerning the UST’s decision to appoint Whitley as Trustee: Whitley, Womble Bond Dickinson, the Debtor, Pax, Bravo Luck, any other creditor or party in interest to this Bankruptcy Case, or anyone acting or purporting to act on behalf of any of the foregoing.
36. All Documents and Communications Concerning any diligence undertaken or analysis performed by the UST to determine whether Whitley and/or Womble Bond Dickinson were Disinterested before the UST filed the Whitley Appointment Notice and the Whitley Approval Application.
37. All Documents and Communications received or reviewed by the UST concerning Whitley and/or Womble Bond Dickinson between the date of the Whitley Appointment Notice and the Whitley Appointment Withdrawal.
38. All Documents and Communications Concerning the Whitley Appointment Withdrawal, Including those Concerning the reasons for the UST’s decision to withdraw the Whitley Appointment Notice and the Whitley Approval Application.
39. All Documents and Communications Concerning the UST’s decision to appoint Despins as Trustee, Including Communications between the UST and any of the following Concerning the UST’s decision to appoint Despins as Trustee: Despins, Paul Hastings, the Debtor, Pax, and any other creditor or party in interest to this Bankruptcy Case, or anyone acting or purporting to act on their behalf.
40. All Documents and Communications Concerning any diligence undertaken or analysis performed by the UST to determine whether Despins or Paul Hastings were Disinterested before the UST filed the Despins Appointment Notice and/or the Despins Approval Application.
41. All Documents and Communications received or reviewed by the UST concerning Despins and/or Paul Hastings between the date of the Despins Appointment Notice and the present.
42. All Documents and Communications between the UST and any person Concerning the Despins Declaration of Disinterestedness or the subject matter thereof.
43. All Documents and Communications between the UST and any person Concerning (i) the First Supplemental Declaration of Disinterestedness of Luc A Despins dated July 12, 2022 (ECF 538), Including the subject matter thereof; and/or (ii) the additional conflicts of interest between the Debtor or the Debtor’s Estate, on the one hand, and Despins and Paul Hastings, on the other hand, as alleged in (a) the Letter from Aaron A. Mitchell on the Debtors behalf Objecting to Appointment of Luc A Despins as Trustee dated July 11, 2022 (ECF 531), Including the letter attached thereto from Aaron A. Mitchell to the UST dated July 11, 2022 (ECF 531-1); and/or (b) the Debtor’s Motion for Relief from Order Appointing Luc A. Despins as Chapter 11 Trustee dated July 15, 2022 (ECF 561).
44. All Documents and Communications between the UST and Despins or Paul Hastings Concerning Paul Hastings’ representation of State-Owned Entities, Including Documents sufficient to identify all State-Owned Entities that Paul Hastings represents or represented, the current status of those representations, and the revenue paid to Paul Hastings by State Owned Entities for said representations since January 1, 2017.
45. All Documents and Communications Concerning any analysis undertaken by the UST regarding whether the percentage of revenue that Paul Hastings generates from State-Owned Entities precludes, or might Preclude, Despins from being a Disinterested Trustee of the Debtor’s Chapter 11 Estate.
46. All Documents and Communications between the UST and Despins or Paul Hastings Concerning:
    1. Paul Hastings offices in the People’s Republic of China;
    2. any licenses, certificates or other authorizations held by Paul Hastings permitting it to operate those offices;
    3. the identity of the Chinese governmental authority issuing any such licenses, certificates or other authorizations;
    4. the terms and conditions for continued maintenance of any such licenses, certificates or other authorizations;
    5. the date of which any such licenses, certificates or other authorizations expire; and
    6. the revenue generated by each of Paul Hastings offices located in the People’s Republic of China for the period beginning January 1, 2017 and ending June 30, 2022.
47. All Communications between the UST and any person Concerning whether Paul Hastings’ business interests in China and ties to the Chinese government, Including Paul Hastings’ multiple offices located in China, or Representation of State owned Entities, impact whether Despins is Disinterested in light of, without limitation, the Chinese government’s widely reported and determined efforts to extradite and punish the Debtor because of his outspoken criticism of the Chinese government.
48. All Documents and Communications between the UST and Despins or Paul Hastings, or Documents or Communications received or reviewed by the UST, Concerning:
    1. The PAG Entities as that term is used in the July 12, 2022, First Supplemental Declaration of Disinterestedness of Luc A. Despins;
    2. The identity of each of the PAG Entities;
    3. The relationship between each of the PAG Entities and PAX;
    4. The relationship between each of the PAG Entities and Paul Hastings, Including the services provided to the PAG Entities by Paul Hastings, Including the scope and status of those services; and
    5. The consideration paid or provided to Paul Hastings by each of the PAG Entities for services rendered.
49. All Communications between the UST and PAX Concerning Despins, Including Communications Concerning whether Despins is Disinterested, or whether Despins might not be Disinterested, as a result of Paul Hastings’ representation of the PAG Entities.
50. All Communications between the UST and the Debtor Concerning Despins, Including Communications Concerning whether Despins is Disinterested, or might not be Disinterested, as a result of (i) Paul Hastings’ business interests in and arising out of China, ties to the Chinese government, or representation of State-Owned Entities, and (ii) the Debtor’s and his Estate’s adverse interests to the Chinese government and the Chinese Communist Party, Including the Chinese government’s widely reported and determined efforts to extradite and punish the Debtor because of his outspoken criticism of the Chinese government.
51. All Documents and Communications Concerning the UST’s efforts to determine whether the individual named Ying Liu listed as a creditor on the Debtor’s Schedules is the same Ying Liu that is or was a client of Paul Hastings, as discussed at paragraph 7(g) of the Despins Declaration of Disinterestedness.
52. All Documents and Communications Concerning the scope of any representation by Paul Hastings of the individual named Ying Liu listed as a creditor on the Debtor’s Schedules, and whether such representation renders Despins not Disinterested.
53. All Documents and Communications Concerning the UST’s efforts to determine whether the individual named Shuang Wang listed as a creditor on the Debtor’s Schedules is the same Shuang Wang that is related to a client or former client of Paul Hastings, as discussed at paragraph 7(h) of the Despins Declaration of Disinterestedness.
54. All Documents and Communications Concerning the scope of Paul Hastings’ representation of the individual or entity related to the individual named Shuang Wang listed as a creditor on the Debtor’s Schedules, and whether such representation renders Despins not Disinterested.
55. All Documents and Communications Concerning the UST’s efforts to determine whether the individual named Yan Huang listed as a creditor on the Debtor’s Schedules is the same Yan Huang that is related to a client or former client of Paul Hastings, as discussed at paragraph 7(i) of the Despins Declaration of Disinterestedness.
56. All Documents and Communications Concerning the scope of Paul Hastings’ representation of the individual or entity related to the individual named Yan Huang listed as a creditor on the Debtor’s Schedules, and whether such representation renders Despins not Disinterested.
57. All Documents and Communications Concerning the UST’s efforts to determine whether the individual named Yan Zhao listed as a creditor on the Debtor’s Schedules is the same Yan Zhao that is related to a client or former client of Paul Hastings, as discussed at paragraph 7(j) of the Despins Declaration of Disinterestedness.
58. All Documents and Communications Concerning the scope of Paul Hastings’ representation of the individual or entity related to the individual named Yan Zhao listed as a creditor on the Debtor’s Schedules, and whether such representation renders Despins not Disinterested