

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address JOHN K. LYONS (Pro Hac Vice) john.lyons@dlapiper.com JEFFREY S. TOROSIAN (Pro Hac Vice) jeffrey.torosian@dlapiper.com DAVID B. FARKAS (CA-257137) david.farkas@dlapiper.com 2000 Avenue of the Stars Suite 400 North Tower Los Angeles, California 90067-4704 Telephone: (310) 500-3412 Fax: (310) 595-3312 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Jonathan D. King, Chapter 7 Trustee	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Zetta Jet USA, Inc., Jointly Administered with Zetta Jet PTE, Ltd. (Case No.: 2-17-bk-21387-SK) Debtor(s).	CASE NO.: 2:17-bk-21386-SK ADVERSARY NO.: 2:18-ap-01340-SK CHAPTER: 7
JONATHAN D. KING, solely in his capacity as Chapter 7 Trustee of Zetta Jet USA, Inc. and Zetta Jet PTE, Ltd., Plaintiff(s). vs. NEW TARGET INVESTMENTS LIMITED, KEBO WU, LINKAGE ACCESS LIMITED, DRAGON PEARL LIMITED, Defendant(s).	UNILATERAL STATUS REPORT [LBR 7016-1(a)(2)] DATE: February 17, 2021 TIME: 9:00 a.m. (PDT) COURTROOM: 1575 ADDRESS: 255 East Temple Street Los Angeles, CA 90012

Plaintiff submits the following UNILATERAL STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|-------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------------------------------|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

All Defendants have been served with the Amended Complaint. But no Defendant has timely answered. Therefore, the clerk has entered default for all Defendants. (Doc. Nos. 88, 89, 103, 142.)

Plaintiff filed a motion for default judgment on February 10, 2021. Accordingly, no discovery or trial is likely to be necessary.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?
Plaintiff Defendant
No trial will be necessary because Plaintiff has moved for default judgment. If all Defendants were to appear, Plaintiff estimates 6 months after they appear.
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
Plaintiff Defendant
All Defendants were foreign and service was only completed after the Court granted alternative service on Defendant Kebo Wu. No Defendant has answered.
3. When do you expect to complete your discovery efforts?
Plaintiff Defendant
No discovery will be necessary because Plaintiff has moved for default judgment. If Defendants were to appear, Plaintiff estimates 4 months.
4. What additional discovery do you require to prepare for trial?
Plaintiff Defendant
If all Defendants appear, Plaintiff anticipates serving interrogatories and document requests as well as taking approximately five depositions.

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?
Plaintiff Defendant
No trial will be necessary because Plaintiff has moved for default judgment. If all Defendants proceed to trial, Plaintiff estimates a trial of at least one week.
2. How many witnesses do you intend to call at trial (*including opposing parties*)?
Plaintiff Defendant
No trial will be necessary because Plaintiff has moved for default judgment. If all Defendants proceed to trial, Plaintiff estimates that he would call more than five witnesses.

3. How many exhibits do you anticipate using at trial?

Plaintiff

Defendant

No trial will be necessary because Plaintiff has moved for default judgment. If all Defendants proceed to trial, Plaintiff anticipates using more than 100 exhibits.

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Defendant

Pretrial conference is is not requested
Reasons:

Pretrial conference is is not requested
Reasons:

Plaintiff

Defendant

Pretrial conference should be set after:
(date) 7/1/2021

Pretrial conference should be set after:
(date) _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

The parties have not had any substantive settlement discussions as of the filing of this Status Report.

2. Has this dispute been formally mediated? Yes No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

Defendant

Yes No

Yes No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

Defendant

I do consent

I do consent

I do not consent

I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: *(Use additional page if necessary)*

On September 13, 2019, Plaintiff filed an Amended Adversary Complaint pursuant to FRCP 15 and FRBP 7015. All Defendants have been served. Linkage Access Limited and New Target Investments Limited were served on Thursday, October 10, 2019, and thus were required to respond by December 9, 2019. Dragon Pearl Limited was served on December 3, 2019, and thus was required to respond by February 3, 2020. Kebo Wu was served on June 4, 2020, and was thus required to respond by August 3, 2020.

All Defendants failed to timely answer, and the clerk has entered default for all Defendants. (Doc. Nos. 88, 89, 103, 142.)

Plaintiff filed a motion for default judgment on February 10, 2021.

Plaintiff's counsel has previously discussed this case with Michael Lubic. (Mr. Lubic previously represented New Target Investments Limited and Linkage Access Limited in this matter.) Mr. Lubic stated that he is not authorized to act on behalf of any Defendant. Plaintiff is therefore filing this Unilateral Status Report.

A status conference is scheduled for February 17, 2021 at 9:00 a.m. (PDT).

Respectfully submitted,

Date: 2/10/2021

Date: _____

DLA Piper (US) LLP
Printed name of law firm

Printed name of law firm

/s/ Jeffrey S. Torosian
Signature

Signature

Jeffrey S. Torosian
Printed name

Printed name

Attorney for: Jonathan D. King, Trustee-Plaintiff

Attorney for: _____

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
DLA Piper LLP (US)
2000 Avenue of the Stars, Suite 400 North Tower
Los Angeles, CA 90067-4704

A true and correct copy of the foregoing document entitled *Unilateral Status Report [LBR 9016-1(a)(2)]* will be served or was served **(a)** on the judge in chambers in the form and manner required by [LBR 5005-2(d)]; and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On February 10, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On February 10, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on February 10, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA OVERNIGHT DELIVERY

VIA ELECTRONIC MAIL

(Party, who is being served if different, and email address for each)

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 10, 2021
Date

William L. Countryman, Jr.
Printed Name

/s/ William L. Countryman, Jr.
Signature

<u>Service by Electronic Mail</u>	
<p>Attorney for New Target Investments Limited and Linkage Access Limited</p> <p>Attn.: Michael Lubic Email: michael.lubic@klgates.com</p>	<p>United States Trustee</p> <p>Attn.: Dare Law Email: dare.law@usdoj.gov</p> <p>Attn.: Ron Maroko Email: ron.maroko@usdoj.gov</p> <p>Attn.: Jill Sturtevant Email: jill.sturtevant@usdoj.gov</p> <p>Attn.: Peter C. Anderson Email: peter.c.anderson@usdoj.gov</p>
<p>Attorney for New Target Investments Limited and Linkage Access Limited in Asia</p> <p>Attn.: Henry Fung Email: henry.fung@hfw.com</p>	<p>Kebu Wu</p> <p>kbwu@orange-sky.com.cn kbwu@chikou5.com</p> <p>Attn.: Henry Fung Email: henry.fung@hfw.com</p>

<u>Defendants by International Service</u>	
<p>Linkage Access Limited (Company No. BVI 1954083) OMC Chambers, Wickham's Cay 1 Road Town, Torola British Virgin Islands</p>	<p>Kebo Wu c/o Orange Sky Golden Harvest Entertainment (Holdings) Limited 124h Floor, AXA Centre 151 Gloucester Road, Wanchai Hong Kong (SAR)</p>
<p>New Target Investments Limited Vistra Corporate Services Centre Ground Floor NPF Building, Beach Road Apia, Samoa</p>	<p>Dragon Pearl Limited The Trust Company of the Marshall Islands, Inc. Trust Company Complex, Ajeltake Road Ajeltake Island, Majuro Republic of the Marshall Islands, MH 96960</p>

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Defendants by Overnight Delivery

Kebo Wu Attn.: Michael Lubic, Esq. K&L Gates 10100 Santa Monica Boulevard Suite 800 Los Angeles, California 90067	
----------------------------------------------------------------------------------------------------------------------------------	--

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.