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20 Attorneys for Jonathan D. King Chapter 7 Trustee

21 **UNITED STATES BANKRUPTCY COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**
23 **LOS ANGELES DIVISION**

24 In re:
25 ZETTA JET USA, INC., a California
26 corporation,
27 Debtor.

24 Lead Case No.: 2:17-bk-21386-SK
25 Chapter 7
26 Jointly Administered With:
27 Case No.: 2:17-bk-21387-SK

28 In re:
29 ZETTA JET PTE, LTD., a Singaporean
30 corporation,
31 Debtor.

28 Adv. Proc. No. 2:18-ap-01340-SK

29 **CHAPTER 7 TRUSTEE'S MOTION FOR**
30 **ADJOURNMENT**

31 JONATHAN D. KING, solely in his capacity
32 as Chapter 7 Trustee of Zetta Jet USA, Inc. and
33 Zetta Jet PTE, Ltd.,
34 Plaintiff,

31 Hearing:
32 Date: March 31, 2021
33 Time: 9:00 am PDT
34 Place: Courtroom 1575
255 East Temple Street
Los Angeles, CA 90012

35 v.
36 NEW TARGET INVESTMENTS LIMITED,
37 KEBO WU, LINKAGE ACCESS LIMITED,
38 and DRAGON PEARL LIMITED,
39 Defendants.

1 **TO THE HONORABLE SANDRA R. KLEIN, UNITED STATES BANKRUPTCY JUDGE,**
2 **THE UNITED STATES TRUSTEE, ALL CREDITORS, NEW TARGET INVESTMENTS**
3 **LIMITED, KEBO WU, LINKAGE ACESS LIMITED, AND DRAGON PEARL LIMITED:**

4 Jonathan D. King, solely in his capacity as the duly appointed chapter 7 trustee (the
5 “Trustee”) in the above-captioned, jointly administered bankruptcy cases (the “Chapter 7 Cases”)
6 of Zetta Jet USA, Inc. (“Zetta USA”) and Zetta Jet PTE, Ltd. (“Zetta PTE” and together with Zetta
7 USA, the “Debtors”), by and through his undersigned counsel, hereby moves (the “Motion”) this
8 Court for entry of an order, adjourning the hearing for that certain *Trustee’s Motion for Default*
9 *Judgment against New Target Investments Limited, Linkage Access Limited, Dragon Pearl Limited,*
10 *and Kebu Wu and Memorandum of Points and Authorities in Support Thereof* (“Default Judgment
11 Motion”) [Docket No. 161] set for March 31, 2021. In support of this Motion, the Trustee
12 respectfully states as follows:

13 **REQUEST FOR ADJOURNMENT**

14 1. On February 11, 2021, the Trustee filed the Default Judgment Motion. The Default
15 Judgment Motion is set for hearing on March 31, 2021 at 9:00 a.m. [Docket No. 163].

16 2. None of the Defendants to the Default Judgment Motion have responded.

17 3. The Trustee has decided to file a motion seeking substantive consolidation of
18 Defendant Dragon Pearl Limited with Debtor Zetta PTE, Ltd.

19 4. The motion seeking substantive consolidation will provide additional grounds for
20 entry of default judgment, which grounds the Trustee reserved in his Default Judgment Motion [*see*
21 Docket No. 161 at 14 n.5], and will afford more flexibility to the Trustee in enforcing the default
22 judgment against the assets of the defaulting Defendants.

23 5. The Trustee will provide the required notice of hearing with respect to the proposed
24 adjourned Default Judgment Motion after a hearing on the motion for substantive consolidation has
25 been calendared.

26 6. The adjournment requested is without prejudice to any of the rights of the Parties
27 with respect to the Default Judgment Motion.

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WHEREFORE, the Trustee respectfully requests that this Court

(A) Order that the hearing on Default Judgment Motion be adjourned; and

(B) Grant such other and further relief as is appropriate and just under the circumstances.

DATED: March 26, 2021

DLA PIPER LLP (US)

By: /s/ David B. Farkas

DAVID B. FARKAS

JOHN K. LYONS (*Pro Hac Vice*)

JEFFREY S. TOROSIAN (*Pro Hac Vice*)

Attorneys for Jonathan D. King as
Chapter 7 Trustee

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 *Chapter 7 Trustee's Motion for Adjournment* 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 March 26, 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 March 26 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 March 26, 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 HAND 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.

March 26, 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 (in the Chapter 7 Cases) Attn.: Michael Lubic Email: michael.lubic@klgates.com</p>	<p>United States Trustee Attn.: Dare Law Email: dare.law@usdoj.gov Attn.: Ron Maroko Email: ron.maroko@usdoj.gov Attn.: Jill Sturtevant Email: jill.sturtevant@usdoj.gov Attn.: Peter C. Anderson Email: peter.c.anderson@usdoj.gov</p>
<p>Attorney for New Target Investments Limited and Linkage Access Limited in Asia Attn.: Henry Fung Email: henry.fung@hfw.com</p>	<p>Kebo Wu kbwu@orange-sky.com.cn kbwu@chikou5.com Attn.: Henry Fung Email: henry@fund@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 Service

Kebo Wu Attn.: Michael Lubic, Esq. K&L Gates 10100 Santa Monica Boulevard Suite 800 Los Angeles, California 90067	
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.