

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 15
	§	
ROCK INTERNATIONAL INVESTMENT INC., ¹	§	Case No. 20-35623 (MI)
	§	
Debtor.	§	
	§	

**NOTICE OF HEARING
ON FOREIGN RECOGNITION PROCEEDINGS**

PLEASE TAKE NOTICE that on November 19, 2020, Xing Guan, in his capacity as the foreign representative (the “Foreign Representative”) of Rock International Investment Inc. (the “Debtor”), a company incorporated with limited liability under the laws of the British Virgin Islands (“BVI”), with respect to a proceeding (the “BVI Proceeding”) currently pending before the British Virgin Islands High Court of Justice of the Eastern Caribbean Supreme Court and concerning a scheme of arrangement (the “Scheme”) commenced under Section 179A of the BVI Business Companies Act 2004, filed a *Verified Petition for (I) Recognition of Foreign Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief under Chapter 15 of the Bankruptcy Code* (the “Verified Petition”) pursuant to 11 U.S.C. §§ 1504, 1515, and 1517 with the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Debtors seek entry of an order recognizing the BVI Proceeding as a foreign main proceeding pursuant to section 1517 of title 11 of the United States Code (the “Bankruptcy Code”) and granting certain additional relief pursuant to sections 105(a), 1507, 1510, 1515, and 1521 of the Bankruptcy Code.

¹ The Debtor in this chapter 15 proceeding is Rock International Investment Inc. The Debtor’s service address for purposes of this chapter 15 case is Ritter House, Wickhams Cay II, Road Town, Tortola VG1110, British Virgin Islands.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing with respect to the Verified Petition (the “Recognition Hearing”) **for 9:45 am. (prevailing Central Time) on December 11, 2020.**

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition must do so in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules, and such response or objection must be in writing and set forth the basis therefor, which response or objection must be filed with the Court, **so as to be actually received no later than December 8, 2020, at 5:00 p.m. (prevailing Central Time).**

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition filed by the Foreign Representative may be obtained by visiting the Court’s website at <http://www.txsb.uscourts.gov> (a PACER login and password are required to retrieve a document), or by visiting the claims agent’s website at <https://cases.omniagentsolutions.com/rockintl>, or upon written request to the Foreign Representative’s United States counsel addressed to: (i) Jackson Walker, LLP, 1401 McKinney St., Suite 1900, Houston, TX 77010, Attn.: Matthew D. Cavanaugh, Kristhy M. Peguero, and Veronica A. Polnick.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing shall take place electronically. Please note that on March 24, 2020, through the entry of General Order 2020-10, the Court invoked the Protocol for Emergency Public Health or Safety Conditions. The Order may be found at: https://www.txs.uscourts.gov/sites/txs/files/Bankruptcy%20General%20Order%202020-04%20Adoption%20of%20Contingency%20Plan_0.pdf.

Therefore, all persons will appear telephonically and also may appear via video at this hearing using the Court’s electronic conference systems.

The Court will simultaneously use two technology methods to conduct electronic hearings. One method will provide audio communication. The other will provide video access to exhibits and materials presented to the Court. If a party wants to both view the documents presented to the Court and hear the proceeding, the party must 1) dial in through the audio system, and 2) log into the Court's video via the GoToMeeting application.

Audio Communication:

Audio communication will be conducted by use of the Court's regular dial-in number: **(832) 917-1510**. At the start of the call, the caller will be asked to enter a six-digit conference code. The six-digit conference code for this hearing is Judge Isgur conference room number: **954554**. Each caller shall be responsible for its own long-distance charges. Parties are encouraged to review the Court's procedures for telephonic appearances located at <https://www.txs.uscourts.gov/sites/txs/files/Court%20Procedures%20February%2012%2C%202020.pdf>.

Attorneys, witnesses, and parties-in-interest wishing to participate in the hearing must connect to each hearing by audio communication. Any person who wishes to attend the hearing may also dial in to the audio conference dial-in number.

Each person who speaks at the electronic hearing should be prepared to restate that person's name each time that the person speaks in order to assist any transcriber of the audio recording.

Video Communication:

Parties may participate in electronic hearings by use of an internet connection. You may view video via GoToMeeting. To use GoToMeeting, the Court recommends that you download the free GoToMeeting application. To connect, you should enter the meeting code "JudgeIsgur" in the GoToMeeting app or click the link on Judge Isgur's home page on the Southern District of Texas website. Once connected, click the settings icon in the upper right corner and enter your

name under the personal information setting. Any exhibit offered by the Debtor will be filed on the Court's docket. Any party may also obtain an electronic copy of the exhibits by request to counsel to the Foreign Representative.

In addition to seeking the admission of certain exhibits, the Debtor may provide the Court with an overview of the case through a PowerPoint presentation. Any exhibit offered by the Debtor will be filed on the Court's docket. Any party may also obtain an electronic copy of the exhibits by request to counsel to the Foreign Representative.

If any party wishes to offer exhibits, it is recommended that these exhibits be filed on CM/ECF. Each exhibit should be filed as a separate attachment to an Exhibit List in compliance with BLR 9013-2.

Witnesses presented by the Debtor will appear via audio and video connection. Any person wishing to examine the witness will be permitted to do so during the hearing.

Electronic Appearances

Hearing appearances should be made electronically and in advance of the hearing. You may make your electronic appearance by:

- 1) Going to the Southern District of Texas website;
- 2) Selecting "Bankruptcy Court" from the top menu;
- 3) Selecting "Judges' Procedures & Schedules";
- 4) Selecting "View Home Page" for Judge Isgur;
- 5) Under "Electronic Appearance" select "Click here to submit electronic appearance";
- 6) Select Rock International Investment Inc. from the list of electronic appearance links, and
- 7) After selecting Rock International Investment Inc. from the list, complete the required fields and hit the "Submit" button at the bottom of the page.

Submitting your appearance electronically in advance of the hearing will negate the need to make an appearance on the record at the hearing.

PLEASE TAKE FURTHER NOTICE that at such hearing the Court may order the scheduling of a case management conference to consider the efficient administration of this chapter 15 case.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Verified Petition carefully and discuss it with your attorney, if you have one in connection with this chapter 15 case. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested by the Foreign Representative, or if you want the Court to consider your views on any matter requested at the Recognition Hearing, then you or your attorney must attend such hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Foreign Representative and may enter an order granting the relief requested.

Houston, Texas
November 20, 2020

/s/ Matthew D. Cavanaugh

JACKSON WALKER LLP

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Counsel to the Foreign Representative

Certificate of Service

I certify that on November 20, 2020, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh