

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 20-CIV-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP, CORP. and
TCA GLOBAL CREDIT FUND, LTD.,

Defendants, and

TCA GLOBAL CREDIT FUND, LP; TCA GLOBAL
CREDIT FUND, LTD.; TCA GLOBAL CREDIT
MASTER FUND, LP,

Defendants.

**FOREIGN REPRESENTATIVES' NOTICE OF INTENT TO RAISE ISSUE
OF FOREIGN LAW PURSUANT TO FEDERAL RULE 44.1**

Eleanor Fisher and Tammy Fu, in their capacity as Foreign Representatives (the “Foreign Representatives”) of Relief Defendants TCA Global Credit Fund, Ltd. (“Feeder Fund Ltd.”), as recognized by Order of this Court (the “Recognition Order”) in the Chapter 15 case of Feeder Fund Ltd. (the “Chapter 15 Case”)¹ dated June 4, 2021 [Chapter 15 Case, ECF No. 8], by and through undersigned counsel file this Notice of Intent to Raise Issue of Foreign Law pursuant to Federal Rule of Civil Procedure 44.1.

¹ By agreement with the Receiver the Chapter 15 Case was withdrawn to this Court from the U.S. Bankruptcy Court for this District, and docketed as Case No. 1:21-cv-21905-CMA. By further Order dated August 25, 2021, the Court closed the Chapter 15 Case for administrative purposes only and directed that all further filings be made in this Receivership Case.

Specifically, the Foreign Representatives intend, both in their *Memorandum of Law in Opposition to Receiver's Motion for Approval of Distribution Plan and First Interim Distribution* and an accompanying *Declaration*, to raise issues of Cayman Islands law for the consideration of the Court in addressing the underlying Motion.

Dated: April 29, 2022

BAKER & MCKENZIE LLP

/s/ Mark D. Bloom

Mark D. Bloom (Fla. Bar No. 303836)
William V. Roppolo Jr. (Fla. Bar No. 182850)
John R. Dodd (Fla. Bar No. 38091)
1111 Brickell Avenue, Suite 1700
Miami, Florida 33131
Telephone: (305) 789-8900
Facsimile: (305) 789-8953
Email: mark.bloom@bakermckenzie.com
william.roppolo@bakermckenzie.com
john.dodd@bakermckenzie.com

Attorneys for the Foreign Representatives

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a copy of the foregoing was served via CM/ECF Notification to all parties and notification of such filing to all CM/ECF participants in this case.

By: /s/ Mark D. Bloom