

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-21964-CIV-ALTONAGA/Goodman

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP CORP., *et al.*,

Defendants, and

TCA GLOBAL CREDIT FUND, L.P., *et al.*,

Relief Defendants.

**STATEMENT OF CAYMAN ISLANDS FOREIGN
REPRESENTATIVES IN SUPPORT OF RECEIVER'S FOURTH
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE LIQUIDATION PLAN**

Intervenors, Eleanor Fisher and Tammy Fu, as the joint official liquidators (in such capacity, the “**JOLs**”) of TCA Global Credit Fund, Ltd. in a winding up proceeding under the Cayman Islands Companies Act (2020 Revision), FSD Cause No.: 51 of 2020 (RMJ), pending before the Financial Services Division of the Grand Court of the Cayman Islands (the “**Cayman Court**”), and as foreign representatives (in such capacity, the “**Foreign Representatives**”) of the Ltd. Fund in a case under Chapter 15 of the United States Bankruptcy Code pending before this Court as Case No. 21-21905-CIV-ALTONAGA (the “**Chapter 15 Case**”), by and through undersigned counsel, hereby file this Statement in support of the approval of *Receiver's Fourth Unopposed Motion for Extension of Time to File Liquidation Plan* [ECF No. 151] (the “**Extension Motion**”).

STATEMENT

1. Having granted the Foreign Representatives leave to intervene in this case by its Order dated June 9, 2021 [ECF No. 147], this Court is familiar with the appointment of the JOLs by the Cayman Court and, of course, its own grant of recognition to the proceeding before the Cayman Court as a foreign nonmain proceeding in the Chapter 15 case.

2. The Foreign Representatives note the Receiver's filing of the Extension Motion on Friday, June 11, and file this Statement to express their support for the proposed extension through and including November 1, 2021. The Foreign Representatives hope during that extended period to collaborate and cooperate with the Receiver and his professionals, as best calculated to serve the interests of the Ltd. Feeder Fund stakeholders for whose benefit each of them were appointed by the respective courts.

WHEREFORE, the Foreign Representatives support and respectfully request that the Court grant the relief requested in the Extension Motion.

Dated: June 14, 2021

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 JOLs and Foreign
Representatives*

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a copy of the foregoing was served via CM/ECF Notification and/or U.S. Mail to all parties and notification of such filing to all CM/ECF participants in this case on the 14th day of June 2021.

By: /s/ Mark D. Bloom
Mark D. Bloom