

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

AJW OFFSHORE, LTD., *et al.*,

Debtors in Foreign Proceedings.

Chapter 15

Case No. 13-70078-ast

13-70082-ast

13-70085-ast

13-70087-ast

(Jointly Administered)

**ORDER SPECIFYING MANNER  
OF NOTICE FOR HEARING ON ADDITIONAL RELIEF**

Upon the motion (the “Additional Relief Notice Motion”) of Petitioners Ian Stokoe and David Walker, both of PwC Corporate Finance & Recovery (Cayman) Limited (“Petitioners”), the court-appointed liquidators and foreign representatives, as defined in section 101(24) of title 11 of the United States Code (the “Bankruptcy Code”), of AJW Offshore Ltd., AJW Master Fund, Ltd., AJW Offshore II, Ltd., and AJW Master Fund II, Ltd. (collectively the “Offshore Funds”) debtors in foreign main proceedings (the “Cayman Islands Proceedings”), as defined in Bankruptcy Code section 1502(4), for an order specifying manner of notice for the hearing on additional relief, it is hereby:

**ORDERED**, that the Additional Relief Notice Motion is granted as set forth herein; and it is further

**ORDERED**, that copies of this Order and the proposed order granting additional relief attached to the Additional Relief Notice Motion as Exhibit B (the “Proposed Additional Relief Order”) shall be served by United States mail, first-class postage prepaid on or before **February 8, 2013** upon: (i) the Debtors, in accordance with the laws of the Cayman Islands (ii) the U.S. Trustee, (ii) the U.S. Securities and Exchange Commission, (iii) any official liquidating committee or other committee appointed in the Cayman Islands Proceedings of the Offshore Funds, (iv) all persons or bodies authorized to administer the foreign proceedings of the Offshore

Funds, (v) Corey Ribotsky; and (vi) all parties to litigation pending in the United States in which the Offshore Funds are a party at the time of the filing of the petition at their last known addresses or, in the case of Corey Ribotsky, by email; and it is further

**ORDERED**, that Petitioners shall also publish this Order and the Proposed Additional Relief Order on the Offshore Funds' public website: <http://www.ajw-group-liquidation.com/>, on or before **February 8, 2013**, and will further cause emails to be sent to the Offshore Funds' registered stakeholders and the members of the Offshore Funds' liquidation committee, alerting them that the documents are available on such website; and it is further

**ORDERED**, that on or before **February 8, 2013**, Petitioners shall also serve copies of (a) this Order, (b) the Proposed Additional Relief Order, (c) the Official Form B1 Chapter 15 Petitioners, (d) the Verified Petition (without Exhibits B-D), and (e) the Declaration of Ian Stokoe, upon all parties against whom Petitioners currently reasonably anticipate they are or will be seeking additional relief from (to the extent they have not been served already). These parties include the Offshore Funds' former managers, directors, officers, and insiders; (ii) former professionals; (iii) counterparties to the litigation described in Exhibit D of the Verified Petition; and (iv) the Issuers (as defined in the Verified Petition) that Petitioners currently reasonably expect to enforce their contractual rights against; and it is further

**ORDERED**, that a hearing on Petitioners' request for additional relief will be held before the Honorable Alan S. Trust, United States Bankruptcy Judge, United States Bankruptcy Court for the Eastern District of New York, 290 Federal Plaza, Central Islip, New York, 11722, Courtroom 960, on **February 20, 2013 at 10:30 a.m. (Eastern time)**; and it is further

**ORDERED**, that such service shall be good and sufficient service and adequate notice of this Order for all purposes; and it is further


**ORDERED**, that objections, if any, to Petitioners' request for additional relief must be (i) filed with the Bankruptcy Court with proof of service to be received by **12:00 p.m. (Eastern time) on February 15, 2013**; (ii) in writing; (iii) state the name and address of the responding party; (iv) state with particularity the legal and factual bases of any objection; (v) conform to the Bankruptcy Rules and the E.D.N.Y. Local Bankruptcy Rules; and (vi) be served upon Petitioners' counsel at Reid Collins & Tsai LLP, 1301 Capital of Texas Highway, Building C, Suite 300, Austin, Texas 78746 (Attention: R. Adam Swick) to be received on or before **12:00 p.m. (Eastern Time) on February 15, 2013**; and it is further

**ORDERED**, that in the event that any objections are timely filed to Petitioners' request for additional relief, Petitioners may file a reply to such objections by **5:00 p.m. (Eastern time) on February 18, 2013**; and it is further

**ORDERED**, that by **5:00 p.m. (Eastern time) on February 18, 2013**, Petitioners shall file proof of service in accordance with the provisions of this Order.

**Dated: February 7, 2013**  
**Central Islip, New York**



  
\_\_\_\_\_  
**Alan S. Trust**  
**United States Bankruptcy Judge**