

**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.,
et al.,

Defendants.

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NOTICE OF RELATED ACTION

Pursuant to the *Order Granting Plaintiff Securities and Exchange Commission's Unopposed Expedited Motion for Appointment of Receiver* [ECF No. 5] and S.D. Fla. L.R. 3.8, Jonathan E. Perlman, the Receiver in the above-captioned action (“**Receivership Action**”), gives notice of the related pending action styled *In re TCA Global Credit Fund, Ltd.*, 21-cv-21905-KMW (S.D.) (“**Related Action**” or “**DCECF No. _**”) concerning TCA Global Credit Fund, Ltd. (“**Feeder Ltd.**”), a Receivership Entity.¹

1. On February 16, 2021, Eleanor Fisher and Tammy Fu, as the appointed joint official liquidators (“**JOLs**”) of Feeder Ltd. filed a *Verified Petition for Recognition of Foreign Proceeding and Motion for Order Granting Related Relief Pursuant to 11 U.S.C.A. §§ 1515, 1517, and 1520* seeking recognition of a Cayman liquidation proceeding as a foreign main proceeding, or alternatively as a foreign nonmain proceeding, under Chapter 15 of the Bankruptcy Code before the United States Bankruptcy Court for the Southern District of Florida in the case styled *In re TCA Global Credit Fund, Ltd.*, 21-11513-RAM (“**Chapter 15 Case**” or “**BKECF No. _**”) [BKECF

¹ All terms not specifically defined in this Notice of Related Action shall have the same meaning ascribed to them in the May 11, 2020 Appointment Order [ECF No. 5] and the May 18, 2020 First Expansion Order [ECF No. 16].

No. 7].

2. On May 20, 2021, the Receiver and JOLs jointly filed a *Stipulated Joint Motion for (I) Withdrawal of Reference of Chapter 15 Case, and (II) for Entry of Agreed Order Granting Recognition of Foreign Nonmain Proceeding and Incorporated Memorandum of Law (“Stipulated Withdrawal Motion”)* [BKECF No. 22] in the Chapter 15 Case. As more fully set forth in the Stipulated Withdrawal Motion, the Receivership Action and the Chapter 15 Case concern, among other things, the assets and liabilities of Feeder Ltd., which is a Receivership Entity herein. The Stipulated Withdrawal Motion initiates the multistep process by which the Receiver and JOLs have agreed to seek approval to present, address, and resolve the overlapping issues in the Chapter 15 Case and the Receivership Action before one Court, which in this case is the Receivership Court with jurisdiction over all of the Receivership Entities, including Feeder Ltd.

3. On May 21, 2021, the docket of the Chapter 15 Case and the Stipulated Withdrawal Motion were transmitted and designated to the Honorable Kathleen M. Williams in the Related Action. [DCECF No. 1]. The Related Action relates both to the Chapter 15 Case and this Receivership Action because the Related Action concerns the resolution of the scope of the dual administration by the Receiver and JOLs of Feeder Ltd. and its assets and liabilities.

Respectfully submitted,

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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 28th day of May 2021.

By: /s/ John H. Genovese
John H. Genovese, Esq.