

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Scott C. Shelley
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Telecopier: (212) 849-7100

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Eric D. Winston (Cal. No. 202407) *pro hac admitted*
Matthew Scheck
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Telecopier: (213) 443-3100

Counsel for Farnum Place, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) **Chapter 15 Case**
)
Fairfield Sentry Limited, et al.,) **Case No. 10-13164 (BRL)**
)
Debtors in Foreign Proceedings.) **Jointly Administered**
)

**APPELLANT’S STATEMENT OF ISSUES ON APPEAL AND
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Appellant Farnum Place, LLC (“Farnum”), by its undersigned counsel, Quinn Emanuel Urquhart & Sullivan, LLP, respectfully submits the following statement of issues to be presented on appeal and designation of items for inclusion in the record on appeal in connection with Farnum’s appeal from:

- I. Memorandum Decision Granting Foreign Representative’s Motion to Disapprove Sale and Denying Farnum’s Motion to Modify the Recognition Order, dated October 13, 2015 (Docket No. 792) (the “Memorandum Decision”);
- II. Order Denying Motion of Farnum Place, LLC Pursuant to Bankruptcy Rule 7037 and 11 U.S.C. § 105(a) for an Order Directing the Liquidator to Produce

Requested Documents, dated October 21, 2015 (Docket No. 793) (the “Discovery Order”);

- III. Order Denying Motion of Farnum Place, LLC Requesting (I) Modification of Recognition Order and (II) Confirmation that Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2), dated October 21, 2015 (Docket No. 794) (the “Farnum Order”); and
- IV. Order Granting Foreign Representative’s Motion Following Remand From the Second Circuit Court of Appeals for Review Pursuant to 11 U.S.C. §§ 363(b) and 1520(a)(2), and Disapproval, in Accordance with the Foreign Representative’s Business Judgment, of the Contemplated Sale of Fairfield Sentry Limited’s SIPA Claim to Farnum Place, LLC, dated October 21, 2015 (Docket No. 795) (the “Liquidator Order”).

I. STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

1. Whether the Bankruptcy Court erred in ruling that the mandate of the court of appeals implicitly foreclosed consideration on remand of issues that were never previously addressed in the decisions of the Bankruptcy Court, this Court, or the court of appeals.

2. Whether the Bankruptcy Court erred in ruling that court review and approval pursuant to 11 U.S.C. §§ 1520(a)(2) and 363 were required before Appellee Kenneth Krys, as foreign representative and BVI liquidator (the “Foreign Representative”) of debtor Fairfield Sentry Limited (“Sentry”), could complete the sale to Farnum (*i.e.*, “realization”) of Sentry’s claim against Bernard L. Madoff Investment Securities LLC in liquidation proceedings under the Securities Investment Protection Act (the “SIPA Claim”), despite the Bankruptcy Court’s prior order “entrusting the administration or realization of [Sentry’s] assets” to the Foreign Representative pursuant to 11 U.S.C. § 1521(a)(5).

3. Whether the Bankruptcy Court erred in failing to consider “all relevant factors” in disapproving Sentry’s sale to Farnum of the SIPA Claim.

4. Whether the Bankruptcy Court erred in concluding that it could not consider the BVI estate or the BVI insolvency proceeding as factors in determining whether to approve Sentry’s sale to Farnum of the SIPA Claim under 11 U.S.C. § 363(b).

5. Whether the Bankruptcy Court erred in failing to afford proper weight to the integrity of the auction process in disapproving Sentry’s sale to Farnum of the SIPA Claim.

6. Whether the Bankruptcy Court erred by refusing to compel the Foreign Representative to produce documents relevant to the question whether Sentry’s sale to Farnum of the SIPA claim should be approved.

7. Whether the Bankruptcy Court erred by concluding that Chapter 15 Court approval of the Trade Confirmation was a contractual condition of the Trade Confirmation?

II. DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Farnum designates the following items to be included in the record on appeal:

Docket No.	Date	Description
04/18/2012	591	Declaration of Kenneth Krys In Support Application Pursuant To 11 U.S.C. Section 105(a), 363, 1507(a), 1520 (a)(2) And 1521(a), For Consideration of SIPA Claim Assignment Transaction Contemplated By Trade Confirmation (related document(s)590) filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Exhibit D# 5 Exhibit E Part 1# 6 Exhibit E Part 2# 7 Exhibit E Part 3# 8 Exhibit F Part 1# 9 Exhibit F Part 2# 10 Exhibit F Part 3# 11 Exhibit F Part 4# 12 Exhibit F Part 5# 13 Exhibit F Part 6# 14 Exhibit F Part 7# 15 Exhibit F Part 8# 16 Exhibit F Part 9# 17 Exhibit F Part 10# 18 Exhibit F Part 11# 19 Exhibit F Part 12# 20 Exhibit F Part 13# 21 Exhibit F Part 14# 22 Exhibit G) (Molton, David) (Modified on 6/14/2012 to Attach Correct PDF File Re: Exhibit F Part 14) (Richards, Beverly). (Entered: 04/18/2012)
06/15/2012	657	Declaration of Scott C. Shelley (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit 1# 2 Exhibit 2# 3 Exhibit 3# 4 Exhibit 4# 5 Exhibit 5# 6 Exhibit 6# 7 Exhibit 7# 8 Exhibit 8# 9 Exhibit 9# 10 Exhibit 10# 11 Exhibit 11# 12 Exhibit 12# 13 Exhibit 13# 14 Exhibit 14# 15 Exhibit 15# 16 Exhibit 16# 17 Exhibit 17# 18 Exhibit 18# 19 Exhibit 19# 20 Exhibit 20# 21 Exhibit 21# 22 Exhibit 22# 23 Exhibit 23# 24 Exhibit 24# 25 Exhibit 25# 26 Exhibit 26# 27 Exhibit 27# 28 Exhibit 28# 29 Exhibit 29# 30 Exhibit 30) (Shelley, Scott) (Entered: 06/15/2012)
06/15/2012	659	Declaration of James F. Mooney in Support of Farnum Place LLC's Objection to Foreign Representatives Application, Pursuant to 11 U.S.C. §§ 105(a), 1507(a), 1520(a)(2), and 1521(a), for Consideration of SIPA Claim Assignment Transaction Contemplated by Trade Confirmation (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Shelley, Scott) (Entered: 06/15/2012)
06/15/2012	660	Declaration of Anne H. Pak in Support of Farnum Place LLC Objection to Foreign Representatives Application, Pursuant to 11 U.S.C. §§ 105(a), 1507(a), 1520(a)(2), and 1521(a), for

		Consideration of SIPA Claim Assignment Transaction Contemplated by Trade Confirmation (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit A) (Shelley, Scott) (Entered: 06/15/2012)
06/15/2012	661	Declaration of Thomas T. Janover in Support of Farnum Place LLC's Objection to Foreign Representative's Application, Pursuant to 11 U.S.C. 105(a), 1507(a), 1520(a)(2) and 1521(a), for Consideration of SIPA Claim Assignment Transaction Contemplated by Trade Confirmation (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit 1) (Shelley, Scott) (Entered: 06/15/2012)
06/15/2012	662	Statement /Request for Judicial Notice in Support of Farnum Place, LLC's Objection to the Foreign Representative's Application, Pursuant to 11 U.S.C. §§ 105(a), 363, 1520(a)(2) and 1521(a), for Consideration of SIPA Claim Assignment Transaction Contemplated by Trade Confirmation (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Exhibit D# 5 Exhibit E# 6 Exhibit F# 7 Exhibit G# 8 Exhibit H# 9 Exhibit I# 10 Exhibit J# 11 Exhibit K# 12 Exhibit L# 13 Exhibit M# 14 Exhibit N# 15 Exhibit O# 16 Exhibit P) (Shelley, Scott) (Entered: 06/15/2012)
07/23/2012	683	Objection <i>Farnum Place, LLC's Objection to the Foreign Representative's Application, Pursuant to 11 U.S.C. §§ 105(a), 363, 1520(a)(2) and 1521(a), for Consideration of SIPA Claim Assignment Transaction Contemplated by Trade Confirmation</i> (related document(s)655) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Shelley, Scott) (Entered: 07/23/2012)
01/02/2013	716	Response to Motion -- Response of Farnum Place, LLC to Motion of the Foreign Representative For Leave to Further Supplement Reply Papers in Support of Application Pursuant to 11 U.S.C. §§ 105(a), 363, 1520(a)(2) and 1521(a) For Consideration of SIPA Claim Assignment Transaction Contemplated By Trade Confirmation (related document(s)714) filed by Scott C. Shelley on behalf of Farnum Place, LLC. with hearing to be held on 1/9/2013 at 10:00 AM at Courtroom 623 (BRL) (Attachments: # 1 Appendix 1# 2 Appendix 2# 3 Appendix 3# 4 Appendix 4# 5 Appendix 5) (Shelley, Scott)

		(Entered: 01/02/2013)
02/13/2015	751	<i>Motion to Approve / Notice Of Motion Regarding Foreign Representatives Motion Following Remand From The Second Circuit Court Of Appeals For Review Pursuant To 11 U.S.C. §§ 363(B) And 1520(A)(2), And Disapproval, In Accordance With The Foreign Representatives Business Judgment, Of The Contemplated Sale Of Fairfield Sentry Limited's SIPA Claim To Farnum Place, LLC</i> filed by David Molton on behalf of Fairfield Sentry Limited with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) Responses due by 3/3/2015,. (Molton, David) (Entered: 02/13/2015)
02/13/2015	752	<i>Memorandum of Law / Foreign Representatives Motion Following Remand From The Second Circuit Court Of Appeals For Review Pursuant To 11 U.S.C. §§ 363(B) And 1520(A)(2), And Disapproval, In Accordance With The Foreign Representatives Business Judgment, Of The Contemplated Sale Of Fairfield Sentry Limited's SIPA Claim To Farnum Place, LLC</i> (related document(s)751) filed by David Molton on behalf of Fairfield Sentry Limited. Objections due by 3/3/2015, (Molton, David) (Entered: 02/13/2015)
02/13/2015	753	<i>Declaration of Daniel J. Saval</i> (related document(s)751) filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Molton, David) (Entered: 02/13/2015)
02/13/2015	754	<i>Declaration of Kenneth Kryz</i> (related document(s)751) filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Molton, David) (Entered: 02/13/2015)
02/13/2015	755	Affidavit of Service (related document(s)751, 753, 752, 754) Filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 02/13/2015)
02/13/2015	756	<i>Motion to Amend Notice of Farnum Place, LLCs Motion Seeking (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i> filed by Scott C. Shelley on behalf of Farnum Place, LLC with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) Responses due by 3/3/2015,. (Shelley, Scott) (Entered: 02/13/2015)

02/13/2015	757	<p>Motion to Amend – <i>Motion of Farnum Place, LLC Requesting (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i>, filed by Scott C. Shelley on behalf of Farnum Place, LLC with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) Responses due by 3/3/2015,. (Attachments: # 1 Exhibit Form of Order) (Shelley, Scott) (Entered: 02/13/2015)</p>
02/13/2015	758	<p>Motion to Amend – <i>Request for Judicial Notice In Support of Farnum Place, LLCs Motion Seeking (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i>, filed by Scott C. Shelley on behalf of Farnum Place, LLC with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) Responses due by 3/3/2015,. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F) (Shelley, Scott) (Entered: 02/13/2015)</p>
02/25/2015	759	<p>Letter to the Honorable Stuart M. Bernstein in response to February 19 letter to Your Honor from counsel to Farnum Place LLC Filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibits A - C to 2-23-15 Letter to Judge Bernstein)(Molton, David) (Entered: 02/25/2015)</p>
02/26/2015	760	<p>Letter dated February 19, 2015, from Scott C. Shelley to the Honorable Stuart M. Bernstein Filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Shelley, Scott) (Entered: 02/26/2015)</p>
02/27/2015	761	<p>Motion to Compel <i>Motion of Farnum Place, LLC Pursuant to Bankruptcy Rule 7037 and 11 U.S.C. § 105(a) for an Order Directing the Liquidator to Produce Requested Documents</i> filed by Scott C. Shelley on behalf of Farnum Place, LLC with hearing to be held on 3/10/2015 (check with court for location) Responses due by 3/7/2015,. (Attachments: # 1 Exhibit Exhibit A - Form of Order # 2 Appendix Appendix 1 # 3 Appendix 2 # 4 Appendix Appendix 3 # 5 Appendix Appendix 4 # 6 Appendix Appendix 5) (Shelley, Scott) (Entered: 02/27/2015)</p>
02/27/2015	762	<p><i>Affidavit Declaration of Scott C. Shelley in Support of Motion to Compel Production of Documents</i> (related document(s)761) Filed by Scott C. Shelley on behalf of Farnum Place, LLC.</p>

		(Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)(Shelley, Scott) (Entered: 02/27/2015)
03/02/2015	763	<i>Statement OF NORDEA LIV & PENSION, LIVSFORSIKRINGSSELSKAP A/S, NORDEA LIVSFORSKRING FINLAND AB, LIVSFORSKRINGSSELSKAPET NORDEA LIV NORGE AS, AND NORDEA LIVSFORSKRING SVERIGE AB in Support of the Foreign Representative's Motion Following Remand From the Second Circuit Court of Appeals for Review Pursuant to 11 USC 363(b) and 1520 (a)(2), and Disapproval, in Accordance with The Foreign Representative's Business Judgment, of the Contemplated Sale of Fairfield Sentry Limited's SIPA Claim to Farnum Place LLC</i> (related document(s)751) filed by Michael T. Mervis on behalf of Nordea Liv & Pension, Livsforsikringselskap A/S, Nordea Livsfrskring Finland Ab, Nordea Livsfrskring Sverige AB. (Mervis, Michael) (Entered: 03/02/2015)
03/03/2015	764	Objection to Motion <i>MORNING MIST HOLDINGS LIMITED AND MIGUEL LOMELIS OBJECTION TO MOTION OF FARNUM PLACE, LLC REQUESTING (I) MODIFICATION OF RECOGNITION ORDER AND (II) CONFIRMATION THAT SALE OF SENTRY CLAIM DOES NOT REQUIRE REVIEW UNDER BANKRUPTCY CODE § 1520(A)(2)</i> (related document(s)757) filed by Robert A. Wallner on behalf of Miguel Lomeli, Morning Mist Holdings Limited. (Wallner, Robert) (Entered: 03/03/2015)
03/03/2015	765	Certificate of Service (related document(s)764) filed by Robert A. Wallner on behalf of Miguel Lomeli, Morning Mist Holdings Limited. (Wallner, Robert) (Entered: 03/03/2015)
03/03/2015	766	So Ordered Stipulation Signed On 3/3/2015. Re: Concerning Briefing And Waiver Of Hearing Related To Motion Of Farnum Place, LLC Pursuant To Bankruptcy Rule 7037 And 11 U.S.C. § 105(a) And Directing The Liquidator To Produce Requested Documents (Greene, Chantel) (Entered: 03/03/2015)
03/03/2015	767	Objection to Motion <i>Foreign Representative's Objection to Farnum Place, LLC's Motion Seeking (I) Modification of Recognition Order and (II) Confirmation That Sale of Sentry Claim Does Not Require Under Bankruptcy Code § 1520(a)(2)</i> (related document(s)758, 757, 756) filed by David Molton on

		behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/03/2015)
03/03/2015	768	Declaration of <i>Daniel J. Saval in Support of the Foreign Representative's Objection</i> (related document(s)758, 757, 756, 767) filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G) (Molton, David) (Entered: 03/03/2015)
03/03/2015	769	Statement <i>Statement of Anwar Class Plaintiffs in Support of Foreign Representative's Motion</i> (related document(s)751) filed by Howard L. Vickery II on behalf of Anwar Class Plaintiffs. (Vickery, Howard) (Entered: 03/03/2015)
03/03/2015	770	Opposition <i>Opposition of Farnum Place, LLC to Foreign Representatives Motion Following Remand From the Second Circuit Court of Appeals for Review Pursuant to 11 U.S.C. §§ 363(b) and 1520(a)(2), and Disapproval, in Accordance With the Foreign Representative's Business Judgment, of the Contemplated Sale of Fairfield Sentry Limited's SIPA Claim To Farnum Place, LLC</i> filed by Scott C. Shelley on behalf of Farnum Place, LLC. with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) (Shelley, Scott) (Entered: 03/03/2015)
03/03/2015	771	Declaration of <i>Scott C. Shelley</i> filed by Scott C. Shelley on behalf of Farnum Place, LLC. with hearing to be held on 3/17/2015 at 10:00 AM at Courtroom 723 (SMB) (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Shelley, Scott) (Entered: 03/03/2015)
03/04/2015	772	Affidavit of Service (related document(s)768, 767) Filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/04/2015)
03/06/2015	773	Notice of Adjournment of Hearing / <i>Notice Of Adjournment Of Hearing On Foreign Representatives Motion Following Remand From The Second Circuit Court Of Appeals For Review Pursuant To 11 U.S.C. §§ 363(B) And 1520(A)(2), And Disapproval, In Accordance With The Foreign Representatives Business Judgment, Of The Contemplated Sale Of Fairfield Sentry Limited's SIPA Claim To Farnum Place, LLC</i> filed by David Molton on behalf of Fairfield Sentry Limited. with hearing to be

		held on 3/31/2015 at 10:00 AM at Courtroom 723 (SMB) (Molton, David) (Entered: 03/06/2015)
03/06/2015	774	Notice of Adjournment of Hearing <i>Notice of Adjournment of Hearing on Motion of Farnum Place, LLC Requesting (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i> (related document(s)757) filed by Scott C. Shelley on behalf of Farnum Place, LLC. with hearing to be held on 3/31/2015 at 10:00 AM at Courtroom 723 (SMB) (Shelley, Scott) (Entered: 03/06/2015)
03/06/2015	775	Amended Notice of Adjournment of Hearing <i>Amended Notice of Adjournment of Hearing on Motion of Farnum Place, LLC Requesting (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i> (related document(s)757) filed by Scott C. Shelley on behalf of Farnum Place, LLC. with hearing to be held on 3/31/2015 at 10:00 AM at Courtroom 723 (SMB) (Shelley, Scott) (Entered: 03/06/2015)
03/07/2015	776	Objection to Motion / <i>FOREIGN REPRESENTATIVES OBJECTION TO FARNUM PLACE, LLCs MOTION SEEKING AN ORDER DIRECTING THE LIQUIDATOR TO PRODUCE REQUESTED DOCUMENTS</i> (related document(s)761) filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/07/2015)
03/08/2015	777	Response <i>Reply to Foreign Representatives Objection To Farnum Place, LLCs Motion Seeking An Order Directing The Liquidator To Produce Requested Documents</i> filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Shelley, Scott) (Entered: 03/08/2015)
03/09/2015	778	Sur-Reply to Motion / <i>Sur-Reply To Reply Of Farnum Place, LLC To Foreign Representatives Objection To Motion Seeking An Order Directing The Liquidator To Produce Requested Documents</i> (related document(s)761) filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/09/2015)
03/13/2015	779	Letter <i>Re: Haven & Novastar Limited Request The Court To Disapprove The Proposed Sale Of claim.</i> Filed by Allan White III. (Greene, Chantel) (Entered: 03/13/2015)

03/17/2015	780	Reply to Motion <i>Omnibus Reply to Objections to Motion of Farnum Place, LLC Requesting (i) Modification of Recognition Order and (ii) Confirmation That Sale of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(a)(2)</i> (related document(s)757) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Appendix) (Shelley, Scott) (Entered: 03/17/2015)
03/17/2015	781	Reply to Motion / <i>Foreign Representatives Reply To The Opposition Of Farnum Place, LLC To The Foreign Representatives Motion Following Remand From The Second Circuit Court Of Appeals For Review Pursuant To 11 U.S.C. §§ 363(B) And 1520(A)(2), And Disapproval, In Accordance With The Foreign Representatives Business Judgment, Of The Contemplated Sale Of Fairfield Sentry Limited's SIPA Claim To Farnum Place LLC</i> (related document(s)751) filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/17/2015)
03/17/2015	782	Declaration / <i>Supplemental Declaration of Daniel J. Saval in Support of Foreign Representative's Reply</i> filed by David Molton on behalf of Fairfield Sentry Limited. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G) (Molton, David) (Entered: 03/17/2015)
03/17/2015	783	Declaration / <i>Supplemental Declaration of Kenneth Kryns in Support of Foreign Representative's Reply</i> filed by David Molton on behalf of Fairfield Sentry Limited. (Molton, David) (Entered: 03/17/2015)
03/27/2015	784	So Ordered Stipulation Signed On 3/27/2015. Re: Concerning Admissibility Of Declarations And Exhibits In Connection With Contested Matters Scheduled For Hearing On March 31, 2015 (Greene, Chantel) (Entered: 03/27/2015)
03/30/2015	785	Order of U.S. District Court Judge Alvin K. Hellerstein signed on 3/18/2015. The case is hereby remanded to the bankruptcy court to conduct a section 363 review consistent with the Court of Appeals' decision. The Clerk shall mark the appeal closed. (tro) (Entered: 03/30/2015)
04/07/2015	786	<i>Letter to Judge Bernstein from David J. Molton addressing the question posed by the Court at the hearing held on March 31, 2015</i> Filed by David Molton on behalf of Fairfield Sentry

		Limited. (Attachments: # 1 Exhibit A # 2 Exhibit B)(Molton, David) (Entered: 04/07/2015)
04/07/2015	787	Letter to the Honorable Stuart M. Bernstein Filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit A)(Shelley, Scott) (Entered: 04/07/2015)
04/01/2015	789	Transcript regarding Hearing Held on 3/31/2015 10:16AM RE: Foreign Representative's Motion for Review of 363 Sale of Claim; Motion of Farnum Place, LLC for (i) Modification of Recognition Order and (ii) Confirmation that Sale of Sentry Claim Does Not Require Review; Request for Judicial Notice in support of Farnum Place LLC's Motion to Modify Recognition Order. Remote electronic access to the transcript is restricted until 6/30/2015. The transcript may be viewed at the Bankruptcy Court Clerks Office. [Transcription Service Agency: Veritext Legal Solutions.]. (See the Courts Website for contact information for the Transcription Service Agency.). Notice of Intent to Request Redaction Deadline Due By 4/8/2015. Statement of Redaction Request Due By 4/22/2015. Redacted Transcript Submission Due By 5/4/2015. Transcript access will be restricted through 6/30/2015. (Ortiz, Carmen) (Entered: 04/21/2015)
07/22/2015	791	Notice of Adjournment of Hearing <i>ON FOREIGN REPRESENTATIVES MOTION FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. §§ 1507, 1509(B) AND 1521(A) RECOGNIZING ANTI-SUIT INJUNCTION IN FAVOR OF FAIRFIELD SENTRY LIMITED ISSUED BY THE EASTERN CARIBBEAN COURT OF APPEAL</i> filed by David Molton on behalf of Fairfield Sentry Limited. with hearing to be held on 12/3/2015 at 10:30 AM at Courtroom 723 (SMB) (Molton, David) (Entered: 07/22/2015)
10/13/2015	792	Written Opinion Signed On 10/13/2015. Re: Memorandum Decision Granting Foreign Representatives Motion To Disapprove Sale And Denying Farnum's Motion To Modify The Recognition Order (related document(s)757, 761, 752) (Greene, Chantel) (Entered: 10/13/2015)
10/22/2015	793	Order Signed On 10/21/2015 Re: Denying Motion Of Farnum Place, LLC Pursuant To Bankruptcy Rule 7037 And 11 U.S.C. § 105(A) For An Order Directing The Liquidator To Produce Requested Documents(Related Doc # 761) . (Greene, Chantel) (Entered: 10/22/2015)

10/22/2015	794	Order Signed On 10/22/2015 Re: Denying Motion Of Farnum Place, LLC Requesting (I) Modification Of Recognition Order And (II) Confirmation That Sale Of Sentry Claim Does Not Require Review Under Bankruptcy Code § 1520(A)(2) (Related Doc # 757) . (Greene, Chantel) (Entered: 10/22/2015)
10/22/2015	795	Order Signed On 10/21/2015 Re: Granting Foreign Representatives Motion Following Remand From The Second Circuit Court Of Appeals For Review Pursuant To 11 U.S.C. §§ 363(B) And 1520(A)(2), And Disapproval, In Accordance With The Foreign Representatives Business Judgment, Of The Contemplated Sale Of Fairfield Sentry Limited's SIPA Claim To Farnum Place, LLC (Related Doc # 751) . (Greene, Chantel) (Entered: 10/22/2015)
10/27/2015	796	Notice of Appeal (related document(s)794, 793, 792, 795) filed by Scott C. Shelley on behalf of Farnum Place, LLC. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)(Shelley, Scott) (Entered: 10/27/2015)

DATED: November 10, 2015

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

By /s/ Scott C. Shelley

Scott C. Shelley
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

- and-

Eric D. Winston
Matthew Scheck
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000

Counsel for Farnum Place LLC