

# **Exhibit A**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION

In Re \* Case No. 22-50073 (JAM)  
\*  
HO WAN KWOK, \* Bridgeport, Connecticut  
\* March 22, 2022  
\* Debtor. \*  
\*  
\* \* \* \* \*

TRANSCRIPT OF CASE MANAGEMENT CONFERENCE/STATUS CONFERENCE  
MOTION OF PACIFIC ASIA OPPORTUNITY FUND L.P. FOR  
ENTRY OF AN ORDER CONFIRMING THE INAPPLICABILITY OF THE  
AUTOMATIC STAY OR, IN THE ALTERNATIVE, RELIEF  
FROM THE AUTOMATIC STAY PURSUANT TO  
SECTION 362(d)(2) OF THE BANKRUPTCY CODE  
BEFORE THE HONORABLE JULIE A. MANNING  
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES:

For the Debtor: WILLIAM BALDIGA, ESQ.  
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For Rui Ma, Creditor:

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1 MR. BALDIGA: No, that -- that's okay.

2 THE COURT: Yep. Okay.

3 MR. BALDIGA: I am try -- and again -- but just to  
4 give an example, and this won't be the time and place for a  
5 full exposition of these issues, but on the theory that  
6 there are some things that you just couldn't make up, but  
7 just -- I want the Court to appreciate that we appreciate,  
8 and this debtor appreciates just how unusual this case is,  
9 and to know that we come before you appreciating the  
10 extraordinary burden we have to make this Court feel  
11 reasonably comfortable that this case will be conducted,  
12 again, to your full expectations.

13 But just to give an example, a three-person  
14 creditor's committee was just formed yesterday. One member  
15 of that committee, Rui Ma, her lawyers, Arkin-Solbakken,  
16 confirmed by letter dated September 30, 2020, that her fees  
17 to sue Mr. Kwok are being paid by a Mr. Zheng Wu, also known  
18 as Bruno Wu.

19 THE COURT: Known as who? Was -- you say, also  
20 known as who? I didn't hear you.

21 MR. BALDIGA: Bruno Wu.

22 THE COURT: Okay. Thank you.

23 MR. BALDIGA: W-U. And I apologize for not  
24 providing to the Court the names from the last hearing. We  
25 will do that this week, as to the last hearing and this

1 week.

2 THE COURT: Yeah. That would be -- that would be  
3 very helpful to the clerk's office.

4 MR. BALDIGA: Well, I apologize we didn't do that.

5 THE COURT: Yeah.

6 MR. BALDIGA: The second member of the Committee,  
7 Sam Nunberg, it had been a person friend of Bruno Wu, he  
8 helped arranged Rui Ma's lawyers for her, Arkin-Solbakken.

9 Mr. Nunberg, a member of the committee, is the  
10 subject of a publically filed, in the United States District  
11 Court for the Southern District of Florida, in Case No. 18-  
12 20983, in Mr. Kwok's case against Roger Stone. That Roger  
13 Stone. Roger Stone's statement, as later published in the -  
14 - by him, in the *Wall Street Journal* and *New York Times*.  
15 I, Roger Stone, retract and apologizes for statements he has  
16 made regarding Guo Wen Gui, also known as Miles Kwok.

17 Mr. Stone has publically stated that Mr. Guo has  
18 been found guilty and convicted of financial crimes in --  
19 and the United States -- in the United States, and that Mr.  
20 Guo has violated U.S. election laws by making political  
21 donations to Hillary Clinton and financing a presidential  
22 run by Steven Bannon. All of these statements are not true.

23 I failed to do proper research before making those  
24 statements and improperly relied on information conveyed to  
25 me by Sam Nunberg, this committee member, between early

1 September 2017 and the Fall of 2017. I believe the source  
2 of that information was Bruno Wu.

3 So that's -- those are -- and Bruno Wu, Your  
4 Honor, just to complete the picture, in his registration as  
5 a foreign agent, he serves as Vice Chairman and Secretary  
6 General of the National Committee on China/US Relations, as  
7 an affiliate of the Charhar Institute, a Chinese  
8 governmental think tank, non-governmental think tank, most  
9 of the other members of which are senior CCP officials.  
10 That's our committee.

11 I'm not disarranging the committee, I'm just  
12 saying that in and of itself makes this an extraordinary  
13 case.

14 I will come to, later today -- while we've already  
15 reached out to the U.S. Trustee to say that even if the U.S.  
16 Trustee had not moved for the appointment of an examiner, we  
17 think an examiner is in order.

18 We don't see how anyone, including the Court,  
19 could be comfortable with the amount of transparency  
20 demanded for a successful Chapter 11 case without a truly  
21 independent examination of this debtor.

22 Not only do we consent to the appointment of an  
23 examiner, we will pay for it. Mr. Kwok has gone to his  
24 family and said if I'm going to have a transparent Chapter  
25 11 case, we need to have an examiner and we need to pay for