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*Proposed Counsel to the Official Committee
of Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

BENITAGO INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11394 (SHL)

Jointly Administered

**VERIFIED STATEMENT OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Official Committee of Unsecured Creditors (the “**Committee**”) in the cases (the “**Chapter 11 Cases**” or “**Cases**”) of the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby submits this verified statement (the “**Verified Statement**”) by and through the undersigned counsel, and respectfully states as follows:

¹ The last four digits of Benitago Inc.’s tax identification number are 4084. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.stretto.com/benitago>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 1 Liberty Street, Ste. 320, New York, New York 10006.

1. On September 15, 2023 (the “**Formation Date**”), the Office of the United States Trustee for Region 2 (the “**U.S. Trustee**”) appointed the Committee pursuant to section 1102(a) of Title 11 of the United States Code (the “**Bankruptcy Code**”) [Dkt. No. 50], which consisted of the following three members: (i) Stefana-Veronica Sticlaru; (ii) CalMyotis (HK) Limited; and (iii) Daniel Samimi.

2. On September 19, 2023, the Committee selected Dechert LLP to serve its proposed counsel.² On September 21, 2023, the Committee selected Province, LLC to serve as its proposed financial advisor.

3. On October 24, 2023, Daniel Samimi resigned from the Committee. As of the date of this Verified Statement, the Committee consists of the following two members: (i) Stefana-Veronica Sticlaru; and (ii) CalMyotis (HK) Limited.

4. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names and addresses of each Committee member, along with the nature and amount of all disclosable economic interests held by each Committee member in relation to the Debtors as of the Formation Date (unless otherwise indicated). The claims and claim amounts set forth in **Exhibit A** have been provided by the applicable Committee members.

5. By filing this Verified Statement, the Committee makes no representation regarding the amount, allowance, or priority of the claims set forth in **Exhibit A** hereto and reserves all rights with respect thereto.

6. The information set forth on **Exhibit A** is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained in this Verified Statement

² The Committee’s professionals are currently preparing retention applications that are expected to be filed with the Court in the near term.

(or set forth in **Exhibit A** hereto) should be construed as (i) a limitation upon, or a waiver or release of, the rights of any Committee member or affiliate thereto to assert, file, and/or amend its claim(s) against the Debtors in accordance with applicable law and any orders entered in these Cases; or (ii) an admission with respect to any fact or legal theory.

7. The Committee reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

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Dated: October 31, 2023
New York, New York

Respectfully submitted,

/s/ Douglas Mannal

Douglas Mannal

David A. Herman

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*Proposed Counsel to the Official Committee of
Unsecured Creditors*

Exhibit A

Names, Addresses, and Nature of Disclosable Economic Interests of Committee Members

Name	Address	Nature and Amount of Disclosable Economic Interests³
Stefana-Veronica Sticlaru (“ <u>Sticlaru</u> ”)	Aleea Soldat Nicolae Barbu 6 bl.13, sc.1, ap.4 Bucuresti, 042017 Romania	Sticlaru holds unsecured claim of \$1,502,362.00 against Debtors Lich LLC, Aludra Limited, and Benitago, Inc., arising out of, or related to, an asset purchase agreement.
CalMyotis (HK) Limited (“ <u>CalMyotis</u> ”)	12th Floor, Santai Building, 137-139 Connaught Road Central, Hong Kong	CalMyotis holds unsecured claim of \$1,366,604.00 against Debtors Izar LLC, Jabbah LLC, Aludra Limited, and Benitago, Inc., arising out of, or related to, an asset purchase agreement.

³ To the best of counsel’s knowledge, the information included herein is accurate as of September 15, 2023. The amounts do not include claims for possible rejection damages and do not reflect the potential priority status of such claims.