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China Branding Group Ltd. (in Official  
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Joint Official Liquidators, Hugh Dickson,  
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 Limited  
 10 Market Street No. 765  
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-and-  
 David Bennett  
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*Pro Se Defendants*

11 *Attorneys for Plaintiffs REMARK*  
 12 *HOLDINGS, INC. and KANKAN LIMITED*

14 **UNITED STATES DISTRICT COURT**  
 15 **DISTRICT OF NEVADA**

16 REMARK HOLDINGS, INC., et al.,

Case No. 2:18-cv-00322

18 *Plaintiffs,*

19 v.

**STIPULATION FOR FURTHER  
 EXTENSION OF TIME FOR  
 CAYMAN DEFENDANTS TO  
 RESPOND TO COMPLAINT  
 (FOURTH AND FINAL REQUEST)**

20 CHINA BRANDING GROUP LIMITED (IN OFFICIAL  
 21 LIQUIDATION), et al.,

22 *Defendants.*

23 Pursuant to Fed. R. Civ. P. 12(a)(1) and LR IA 6-1, Remark Holdings, Inc.; Kankan Limited;  
 24 China Branding Group Limited (In Official Liquidation), an exempted Cayman Islands company  
 25 acting by and through its joint official liquidators (“CBG”); and the Joint Official Liquidators, with  
 26 no personal liability, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David  
 27 Bennett of Grant Thornton Recovery and Reorganisation Ltd (the “JOLs,” and together with CBG,  
 28 the “Cayman Defendants”) hereby stipulate to the further extension of the Cayman Defendants’ time

1 to respond to the Complaint to September 14, 2018. In support of this stipulation, the undersigned  
2 parties state as follows:

3 1. On May 10, 2018, the Bailiff of the Grand Court of the Cayman Islands (the “Grand  
4 Court”) attempted to effect service of the Summons and Complaint on each of the Cayman  
5 Defendants, as demonstrated by the Affidavits of Service dated May 11, 2018 [ECF Nos. 27-29],  
6 and their time to respond to the Complaint was originally May 31, 2018, which time was extended  
7 to June 29, 2018 [see ECF No. 33].

8 2. CBG does not contest service of the Summons and Complaint. The JOLs do not  
9 believe that service of the Summons and Complaint has properly been made upon them. However,  
10 the JOLs are voluntarily electing to waive service of the Summons and Complaint.

11 3. Pursuant to Section 110(2) of the Companies Law (2018 Revision) of the Cayman  
12 Islands, “The official liquidator may – (a) with the sanction of the Court, exercise any of the powers  
13 specified in Part I of Schedule 3 ...” [*Emphasis added*]. That Schedule states “SCHEDULE 3, Powers  
14 of Liquidators, Part I, Powers exercisable with sanction, 1. Power to bring or defend any action or  
15 other legal proceeding in the name and on behalf of the company.”

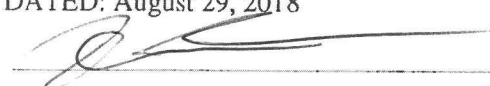
16 4. Accordingly, the Cayman Defendants are obliged to seek approval from the  
17 Liquidation Committee of CBG, following which the Cayman Defendants must apply to the Grand  
18 Court for permission to defend this proceeding and retain U.S. counsel. The Cayman Defendants  
19 have entered into a “funding agreement” in order to retain counsel for their defense, which the  
20 Cayman Defendants expect the Grand Court to approve this week, after which the Cayman  
21 Defendants’ U.S. counsel will have two weeks to prepare a response to the complaint. Accordingly,  
22 the Cayman Defendants have requested a fourth and final extension of their time to respond to the  
23 Complaint in order to obtain those approvals.

24 5. This is the undersigned parties’ fourth request for an extension. The first request was  
25 submitted on June 11, 2018, and was approved by the Honorable Magistrate Judge Carl W. Hoffman  
26 on June 22, 2018. [ECF No. 33]. The second request was submitted on June 28, 2018, and was  
27 approved by the Honorable Magistrate Judge Carl W. Hoffman on July 2, 2018. [ECF No. 35]. The  
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1 third request was submitted on August 3, 2018, and was approved by the Honorable Magistrate Judge  
2 Carl W. Hoffman on August 16, 2018. [ECF No. 37].

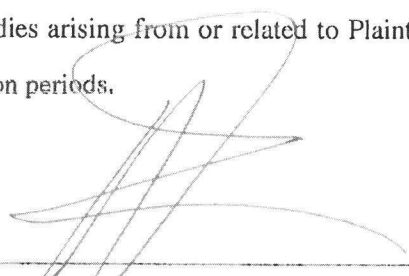
3 6. The undersigned parties stipulate and agree that Plaintiffs' consent to the Cayman  
4 Defendants' extension requests is subject to the Cayman Defendants' agreement to not assert or  
5 otherwise raise any defense to liability, damages or remedies arising from or related to Plaintiffs'  
6 alleged failure to prosecute this action during such extension periods.

7  
8 DATED: August 29, 2018

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19 *Attorneys for Plaintiffs REMARK*  
20 *HOLDINGS, INC. and KANKAN LIMITED*

  
21 JOINT OFFICIAL LIQUIDATORS, with no  
22 personal liability, HUGH DICKSON OF  
23 GRANT THORNTON SPECIALIST  
24 SERVICES (CAYMAN) LTD, and DAVID  
25 BENNETT OF GRANT THORNTON  
26 RECOVERY AND REORGANISATION  
27 LTD  
28 *for and on behalf of*  
CHINA BRANDING GROUP LIMITED  
(IN OFFICIAL LIQUIDATION)

*Pro se Defendants*

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 REMARK HOLDINGS, INC., et al.,

Case No. 2:18-cv-00322

4 *Plaintiffs,*

**ORDER ON STIPULATION FOR  
FURTHER EXTENSION OF TIME  
FOR CAYMAN DEFENDANTS TO  
RESPOND TO COMPLAINT  
(FOURTH HAND FINAL REQUEST)**

5 v.

6 CHINA BRANDING GROUP LIMITED (IN OFFICIAL  
7 LIQUIDATION), et al.,

8 *Defendants.*

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11 The Court, having considered the above stipulation of the parties, and good cause appearing,  
12 finds as follows:

13 1. Defendant China Branding Group Limited (In Official Liquidation), an exempted  
14 Cayman Islands company acting by and through its joint official liquidators, with no personal liability  
15 (“CBG”) was validly served with the Summons and Complaint on May 10, 2018. The Joint Official  
16 Liquidators, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David Bennett  
17 of Grant Thornton Recovery and Reorganisation Ltd (the “JOLs,” and together with CBG, the  
18 “Cayman Defendants”), dispute that they have been properly served with the Summons and  
19 Complaint, however, the JOLs agreed to voluntarily accept service of the Summons and Complaint.  
20 The Cayman Defendants’ time to respond to the Complaint is presently August 31, 2018.

21 2. The Cayman Defendants have requested a further extension in order to obtain  
22 approvals of the Grand Court of the Cayman Islands (the “Grand Court”), which approval is required  
23 to enable the Cayman Defendants to defend this proceeding and retain U.S. counsel. That approval  
24 process has been commenced but the Cayman Defendants have not yet received the approval of the  
25 Grand Court, but have received approval of the Liquidation Committee and have entered into a  
26 funding agreement.

27 3. This is the undersigned parties’ fourth request for an extension.  
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1 IT IS ORDERED THAT the Cayman Defendants shall have until September 14, 2018 to file  
2 a response to the Complaint.

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4 IT IS SO ORDERED:

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7 \_\_\_\_\_  
8 United States Magistrate Judge

9 DATED: August 31, 2018

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