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*Counsel to Atlas Financial Holdings, Inc.  
as Foreign Representative*

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

----- X  
In re: : Case No. 22-10260 (LGB)  
: :  
ATLAS FINANCIAL HOLDINGS, INC., : Chapter 15  
: :  
Debtor in a Foreign Proceeding. :  
----- X

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
TELEPHONIC HEARING ON MARCH 30, 2022 AT 10:00 A.M. (EDT)**

**Parties wishing to participate must make arrangements through CourtSolutions LLC at  
<https://www.court-solutions.com>**

**PLEASE TAKE NOTICE** that, on March 4, 2022, Atlas Financial Holdings, Inc., as duly appointed foreign representative (in such capacity, the “Foreign Representative”) for itself as the debtor (the “Foreign Debtor”) in a foreign proceeding, commenced in the Cayman Islands on January 4, 2022, pursuant to section 86 of the Companies Act (2021 Revision) (the “Companies Act”) and pending before the Grand Court of the Cayman Islands (the “Cayman Court”), Financial Services Division, as Cause No. FSD 3 of 2022 (the “Cayman Proceeding”), in connection with its scheme of arrangement (the “Scheme”), by and through its undersigned counsel, filed, among other documents, a *Chapter 15 Petition for Recognition of a Foreign Proceeding* [Docket No. 1] (the “Petition”) and the *Verified Petition Under Chapter 15 of the Bankruptcy Code for Recognition of Cayman Proceeding as a Foreign Proceeding, Enforcement of the Scheme of*

*Arrangement Within the United States and Related Relief* [Docket No. 2] (the “Verified Petition” and together with the Petition, the “Chapter 15 Petition”) and related motions and supporting documents, as set forth below, with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”):

**A. Matters Going Forward**

1. *Chapter 15 Petition for Recognition of a Foreign Proceeding of Atlas Financial Holdings, Inc.* [Docket No. 1; Filed 03/04/2022].
2. *Verified Petition Under Chapter 15 of the Bankruptcy Code for Recognition of Cayman Proceeding as a Foreign Proceeding, Enforcement of the Scheme of Arrangement Within the United States and Related Relief* [Docket No. 2; Filed 03/04/2022].

**Status:** This matter is going forward.

**Related Pleadings:**

- A. *Declaration of Foreign Expert in Support of Verified Petition Under Chapter 15 for Order and Final Decree Granting Recognition of Foreign Proceeding and Enforcement of the Scheme of Arrangement Within the United States* [Docket No. 4; Filed 03/04/2022].
- B. *Declaration of R. Craig Martin Regarding Determination of Foreign Law* [Docket No. 6; Filed 03/04/2022].
- C. *Memorandum of Law in Support of Verified Petition of the Foreign Representative for Recognition of Cayman Proceeding as Foreign Proceeding, Enforcement of Scheme of Arrangement Within the United States, Approval of the Procedure Governing Closing This Chapter 15 Case and Related Relief* [Docket No. 7; Filed 03/04/2022].
- D. *Order (I) Scheduling Hearing on (A) Chapter 15 Petition and Recognition of Cayman Proceeding as a Foreign Proceeding, (B) Enforcement of the Scheme of Arrangement Within the United States and (C) Procedure Governing Closing of This Chapter 15 Case, (II) Specifying Form and Manner of Service of Notice and (III) Granting Related Relief* [Docket No. 5, Filed 03/04/2022].
- E. *Affidavit of Service* [Docket No. 12, Filed 03/09/2022].
- F. *Affidavit of Service* [Docket No. 13; Filed 03/11/2022].
- G. *Supplemental Affidavit of Service* [Docket No. 14; Filed 03/22/2022].

**Response Deadline:** March 23, 2022 at 5:00 p.m. (ET).

**Responses Received:**

- A. *Reservation of Rights of Lead Plaintiffs in the Fryman Matter to the Motion of the Foreign Representative for an Order, (I) Scheduling Hearing on (A) Chapter 15 Petition and Recognition of the Cayman Proceeding as a Foreign Proceeding, (B) Enforcement of the Scheme of Arrangement Within the United States and (C) Closure of the Chapter 15 Case, (II) Specifying Form and Manner of Service and (III) Granting Related Relief* [Docket No. 15; Filed 03/23/2022].

**Status:** This matter is going forward.

Dated: New York, New York  
March 28, 2022

Respectfully submitted,

**DLA PIPER LLP (US)**

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