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

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF FILING OF PLAN SUPPLEMENT
FOR THE DEBTORS’ AMENDED JOINT CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that, on December 29, 2023, Genesis Global Holdco, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the *Plan Supplement for the Debtors’ Amended Joint Chapter 11 Plan* (ECF No. 1117), which included the following materials: (a) the Schedule of Assumed Executory Contracts and Unexpired Leases; (b) the Members of the Litigation Oversight Committee and Wind-Down Debtors Oversight Committee; (c) the List of Intercompany Claims that Constituted Excluded Claims; (d) Retained Causes of Action; (e) the Digital Assets Conversion Table; and (f) Justifications for Exculpated & Released Parties.²

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific PTE. LTD. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the *Debtors’ Amended Joint Chapter 11 Plan* (ECF No. 989) (the “Plan”) or the *Amended Disclosure Statement with Respect to the Amended Joint Plan of Genesis Global Holdco, LLC et al., Under Chapter 11 of the Bankruptcy Code* (ECF No. 1031) (the “Disclosure Statement”).

PLEASE TAKE FURTHER NOTICE that, on January 6, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the identity of the PA Officer and (b) the candidates for the New Board.

PLEASE TAKE FURTHER NOTICE that, on January 8, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the Plan Administration Agreement; (b) the Litigation Oversight Committee Bylaws; (c) the Wind-Down Oversight Committee Bylaws; and (d) new governance documents.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file the following additional exhibit to the Plan Supplement, as may be modified, amended, or supplemented from time to time:

Exhibit M: Setoff Principles for Allowance of Certain Claims

PLEASE TAKE FURTHER NOTICE that the Debtors expressly reserve the right, subject to the terms and conditions set forth in the Plan to alter, amend, modify, or supplement any document in the Plan Supplement and to file additional documents to be included in the Plan Supplement. Certain of the documents in the Plan Supplement remain subject to ongoing negotiations between the Debtors and other parties to those documents, and the Debtors and all such parties reserve their rights with regard to those documents. To the extent any document in the Plan Supplement is altered, amended, modified, or supplemented in any material respect, in accordance with the terms of the Plan, prior to the Confirmation Hearing (as defined below), the Debtors will file a blackline of such document with the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that the forms of the documents contained in the Plan Supplement are integral to, and are considered part of, the Plan. If the Plan is approved, the documents in substantially the form contained in the Plan Supplement will be approved by the Bankruptcy Court pursuant to the order confirming the Plan.

PLEASE TAKE FURTHER NOTICE that the hearing (the “Confirmation Hearing”) will be held before the Honorable Sean H. Lane of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on February 14, 2024 at 10:00 a.m. (prevailing Eastern Time), to consider the confirmation of the Plan, any objections thereto, and any other matter that may properly come before the Bankruptcy Court. Please take further notice that the Confirmation Hearing may be continued from time to time by the Bankruptcy Court without further notice other than by such adjournment being announced in open court or by notice of adjournment filed with the Bankruptcy Court and served on other parties entitled to notice.

PLEASE TAKE FURTHER NOTICE that parties wishing to appear or be heard at the Confirmation Hearing should use the eCourt Appearances link on the Court’s website: <https://www.nysb.uscourts.gov/ecourt-appearances>. After the deadline to make appearances passes, the Court will circulate by email Zoom links to those persons who made eCourt Appearances, using the email addresses submitted with those appearances.

PLEASE TAKE FURTHER NOTICE that copies of all pleadings filed in these chapter 11 cases can be viewed and/or obtained: (i) by visiting the Debtors’ case website at

<https://restructuring.ra.kroll.com/genesis/>, (ii) otherwise from the Debtors' notice and claims agent, Kroll Restructuring Administration LLC, located at 55 East 52nd Street, 17th Floor, New York, NY 10055, or by calling +1 888-524-2017 or (iii) accessing the Court's website at www.nysb.uscourts.gov. Note that a PACER password is needed to access documents on the Court's website.

Dated: January 9, 2024
New York, New York

/s/ Jane VanLare
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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 21-11831 (SHL)

Jointly Administered

**PLAN SUPPLEMENT FOR THE
DEBTORS’ AMENDED JOINT CHAPTER 11 PLAN**

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Exhibit M: Setoff Principles for Allowance of Certain Claims

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¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific PTE. LTD. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

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EXHIBIT M

Setoff Principles for Allowance of Certain Claims

SETOFF PRINCIPLES FOR ALLOWANCE OF CERTAIN CLAIMS

If the Debtors¹ or the Wind-Down Debtors, as applicable, set off, pursuant to Article IV.B.16 of the Plan: (a) the value of any debt owed to a Debtor by a Holder of a Claim entitled to receive distributions under the Plan against the value of any Loan Collateral that the Holder of such Claim delivered to the applicable Debtor to secure a loan (to the extent that the applicable Debtors' failure to return such Loan Collateral gives rise to a Claim entitled to receive distributions under the Plan) or (b) any Claim entitled to receive distributions under the Plan against the value of any debt owed by the Holder of such Claim to the applicable Debtor, then all digital asset values in (a) and (b) shall be determined as set forth in the Digital Assets Conversion Table.

The Debtors shall file a motion with the Bankruptcy Court to modify the stay imposed by section 362 of the Bankruptcy Code and allow at the resulting value any Claims subject to setoff on the terms set forth herein. The foregoing shall apply solely to those claims listed on Exhibit 1² attached hereto and, for the avoidance of doubt, the foregoing shall not apply to Claims for which a Debtor acted as borrower under a Loan and posted Loan Collateral to secure its obligations thereunder, as to which the Debtors reserve all of their rights and defenses including, without limitation, the applicable valuation date for such Loan Collateral and, subject to clause (b) of Article IV.B.14 of the Plan, all rights and defenses available to the Debtors under chapter 5 of title 11 of the United States Code.

¹ All capitalized terms used herein shall have the meaning ascribed to them in the Plan.

² The names of individual creditors have been redacted pursuant to the *Order Granting the Debtors' and the Official Committee of Unsecured Creditors' Motions for Entry of an Order Requiring the Redaction of Certain Personally Identifiable Information* (ECF No. 694). The value of any Claims listed on Exhibit 1 are exclusive of any interest accrued after the Petition Date, which interest, if any, will be paid in accordance with the Plan and the Court's determination on entitlement and amounts thereof.

EXHIBIT 1

Counterparty	Filed Claim Number	Schedule F Claim Number
[REDACTED]	N/A	GGC 3.1.0020
[REDACTED]	365	GGC 3.1.0032
[REDACTED]	22	GGC_3.1.0046
[REDACTED]	445	GGC_3.1.0050
[REDACTED]	N/A	GGC 3.1.0078
[REDACTED]	265	GGC 3.1.0103
[REDACTED]	351	GGC 3.1.0104
[REDACTED]	939	GGC_3.1.0130
[REDACTED]	N/A	GGC 3.1.0146
[REDACTED]	831 - Anonymous Lender 28	GGC 3.1.0152
[REDACTED]	367	GGC 3.1.0164
[REDACTED]	476	GGC_3.1.0251
[REDACTED]	N/A	GGC 3.1.0271
[REDACTED]	N/A	GGC_3.1.0359
[REDACTED]	N/A	GGC 3.1.0396
[REDACTED]	311	GGC 3.1.0498
[REDACTED]	N/A	GGC 3.1.0515
[REDACTED]	831 - Anonymous Lender 79	GGC_3.1.0574
[REDACTED]	528	GGC 3.1.0599
[REDACTED]	491	GGC 3.1.0614
[REDACTED]	180	GGC_3.1.0624; GGC 3.1.0625