

United States Bankruptcy Court for the:

\_\_\_\_\_ District of Delaware

Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Toshiba Samsung Storage Technology Korea Corporation

2. Debtor's unique identifier For non-individual debtors:

Federal Employer Identification Number (EIN) \_\_\_\_\_

Other 124-86-17441 Describe identifier Business Registration Number

For individual debtors:

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) Dae Sung Cho

4. Foreign proceeding in which appointment of the foreign representative(s) occurred South Korea (Seoul Central District Court)

5. Nature of the foreign proceeding

Check one:

- Foreign main proceeding
- Foreign nonmain proceeding
- Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

- A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.
- A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.
- Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

- No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)
- Yes

Debtor Toshiba Samsung Storage Technology Korea Corporation  
 Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

South Korea

**Debtor's registered office:**

88 Sinwon-ro  
 Number Street

P.O. Box \_\_\_\_\_

Suwon city Yoengtong-gu Gyeonggi-do 16681  
 City State/Province/Region ZIP/Postal Code

South Korea  
 Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
 Number Street

\_\_\_\_\_  
 P.O. Box

\_\_\_\_\_  
 City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
 Country

**Address of foreign representative(s):**

88 Sinwon-ro  
 Number Street

\_\_\_\_\_  
 P.O. Box

Suwon city Yoengtong-gu Gyeonggi-do 16681  
 City State/Province/Region ZIP/Postal Code

South Korea  
 Country

**10. Debtor's website (URL)**

<http://www.tsst.co.kr/ENG/>

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify \_\_\_\_\_
- Individual

Debtor Toshiba Samsung Storage Technology Korea Corporation

Case number (if known) \_\_\_\_\_

\_\_\_\_\_  
Name

12. Why is venue proper in this district?

Check one:

Debtor's principal place of business or principal assets in the United States are in this district.

Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:

LG Electronics, Inc. and LG Electronics U.S.A., Inc. v. Toshiba Samsung Storage Technology Korea Corporation, C.A. No. 12-1063 (LPS) (CJB)

If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:

13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Signature of foreign representative

Dae Sung Cho

Printed name

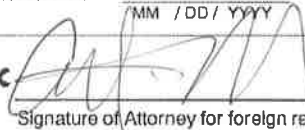
Executed on 7/5/2016  
MM / DD / YYYY

\_\_\_\_\_  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

  
Signature of Attorney for foreign representative

Date 7/5/2016  
MM / DD / YYYY

Curtis S. Miller

Printed name

Morris, Nichols, Arsht & Tunnell LLP

Firm name

1201 N. Market St., P.O. Box 1347

Number Street

Wilmington

City

DE 19899

State ZIP Code

(302) 658-9200

Contact phone

cmiller@mnat.com

Email address

Bar No. 4583

Bar number

Delaware

State

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**EXHIBIT A**



**Registered No. 2016-P 630**

# **CERTIFICATE**



**CERTIFIED PUBLIC TRANSLATOR'S OFFICE**

**102-403 (Gyeonji-dong, Daeseong Skyrex) #95, Sambong-ro, Jongno-gu, Seoul, Korea 110-170**

**(Commisson No. 14301088891, Jongno-gu Office Register No. 2015-8)**

**Seoul Central District Court**  
**Bankruptcy Department No. 6**

**DECISION**

Case No. 2016 *Hoehap*100090 Rehabilitation

Applicant and Debtor	Toshiba Samsung Storage Technology Korea Corporation  14 <sup>th</sup> Fl. 102, Sinwon-ro 88 (Sin-dong, Digital Empire 2), Youngtong-gu, Suwon  Representative director Lee, Joo Hyung
Legal representative	Choi, Hyo Jong, attorney at law

**Order**



1. The Rehabilitation Procedures be commenced for Debtor
2. Cho, Dae Sung (Resident registration number 630801-1173413, residing at [redacted]) is hereby appointed as the custodian of Debtor.
3. The term of office of the custodian shall be 30 days from the date of authorization of the draft rehabilitation plan.
4. The list of rehabilitation creditors, secured rehabilitation creditors and shareholders shall be submitted from June 16, 2016 through June 30, 2016.
5. The list of rehabilitation claim, rehabilitation security right, and shares shall be reported to the court from July 1, 2016 through July 15, 2016.
6. The inspection period for rehabilitation claims and rehabilitation security rights shall be from July 16 through July 29, 2016.
7. The draft rehabilitation plan shall be submitted to the court by August 26, 2016

**Ground**

**1. Fact recognized**

Based on the record presented to the court and questioning of the representative of Debtor, it is recognized that:

- A. Debtor was incorporated on January 29, 2014 to conduct the business of research & development, manufacture, sale, export/import and provision of operation and

maintenance technology service for optical disc devices ("ODD"), and the application equipment and related parts.

B. Debtor is a non-listed company with a total number of issued outstanding shares of 2,145,713 shares (with par value of KRW5,000) and paid-in capital of 10,728,565,000 KRW of which Toshiba Samsung Storage Technology Corporation, a Japanese corporation, owns 50.1% of its stock, while Optis owns the remaining 49.9%. The representative director of Optis Co., Ltd. concurrently serves as representative of Debtor.

C. The following table shows the assets, liabilities and profit/loss of Debtor for the last 5 years. As shown below, the total liabilities exceed the total assets as of the date of this application.

<assets and liabilities for the last 5 years>

	(in Korean Won)				
	2016. 3. 31	2015. 3. 31	2014. 3. 31	2013. 3. 31	2012. 3. 31
Current assets	33,271,600,838	91,170,154,343	98,107,581,114	183,359,893,365	326,620,853,654
Non-current assets	31,490,773,338	56,257,655,939	65,360,526,068	44,169,213,531	49,223,140,697
Total assets	64,762,374,176	147,427,810,282	163,468,107,182	227,529,106,896	375,843,994,351
Current liabilities	86,649,662,302	120,015,246,988	131,612,069,899	169,475,545,943	234,871,656,558
Non-current liabilities	4,513,602,755	2,456,483,671	3,166,391,207	885,599,640	12,293,082,798
Total liabilities	91,163,265,057	122,471,730,659	134,778,461,106	170,361,145,583	247,164,739,356

<Sales and profit/loss for the last 5 years>

	(in millions of Korean Won)				
	2016. 3. 31	2015. 3. 31	2014. 3. 31	2013. 3. 31	2012. 3. 31
Sales	382,728	554,508	814,761	996,825	1,468,473
Net profit (loss)	(53,304)	(89,055)	(28,478)	(70,207)	13,340

D. Debtor is experiencing financial difficulties due to lack of liquidity as a result of the sharp decline in the ODD market and failure to shift to new business models and to optimize the workforce.

## 2. Judgment



Based on the facts recognized above, Debtor has a reasonable ground to file an application with the court for commencing the rehabilitation procedures pursuant to Article 34 (1) of Debtor Rehabilitation and Bankruptcy Act ("DRB Act"), because it would be impossible for Debtor to repay its obligations as they become due and payable, without any serious hindrance to the continuation of its business; and it is feared that bankruptcy may accrue to the Debtor, and there is no ground to dismiss the application filed for Commencing Rehabilitation Procedure pursuant to Article 42 of DRB Act.

### 3. Conclusion

The court hereby authorizes the commencement of Rehabilitation Procedure for the Debtor, and appoints Cho, Dae Sung, a third party, as the custodian after hearing the opinions of the Custodial Committee pursuant to Article 74 of DRB Act, and further issues Orders with respect to the periods in which the list of rehabilitation creditors, secured rehabilitation creditors and shareholders shall be submitted and the list of rehabilitation claim, rehabilitation security right, and shares shall be reported and the rehabilitation claims and rehabilitation security rights entered therein shall be inspected, and the draft rehabilitation plan shall be submitted to the court as specified in Order in accordance with Article 50 (1) of DRB Act.

Date: June 16, 2016 11:00 a.m.

Chief judge Kim Jung Man (seal)

Judge Shim Tae Gyu (seal)

Judge Cha Seung Hwan (seal)



**This is the original Document.**

June 16, 2016

Seoul Central District Court

Court Secretary Kang Ho Sung (Seal)



※ You can check the authenticity of this document either by referring to the document number on the computer monitors placed in the Customer Service Center of each court, or by inquiring the judges about the document number indicated below.

서울중앙지방법원

제 6 파 산 부

결 정

사 건 2016회합100090 회생

신 청 인 겸 채 무 자 도시바삼성스토리지테크놀러지코리아 주식회사  
수원시 영통구 신원로 88, 102동 14층(신동, 디지털엠피아이2)  
대표이사 이주형  
신청대리인 변호사 최효종

주 문



1. 채무자에 대하여 회생절차를 개시한다.
2. 조대성[주민등록번호 : 630801-1173413, 주소 : 서울특별시 강남구 테헤란로 152, 15층(삼성동, 삼성생명빌딩)]
3. 관리인의 임기를 이 사건 회생계획안의 인가결정일로부터 30일까지로 한다.
4. 회생채권자, 회생담보권자 및 주주의 목록 제출기간을 2016. 6. 16.부터 2016. 6. 30.까지로 한다.
5. 회생채권, 회생담보권 및 주식의 신고기간을 2016. 7. 1.부터 2016. 7. 15.까지로 한다.
6. 회생채권, 회생담보권의 조사기간은 2016. 7. 16.부터 2016. 7. 29.까지로 한다.
7. 회생계획안의 제출기간을 2016. 8. 26.까지로 한다.

이 유

1. 인정사실  
이 사건 기록과 채무자의 대표자 심문결과에 의하면 다음 사실을 인정할 수 있다.  
가. 채무자는 2004. 1. 29. 광디스크 드라이브, 그 응용제품 및 주요 관련 부품의 연

구, 개발, 제조, 판매, 수출입과 유지관리 기술서비스의 제공업 등을 목적으로 설립되어 광디스크드라이브 개발, 판매 및 수출입업을 주로 영위하고 있다.

나. 채무자는 비상장법인으로 발행주식수는 보통주 2,145,713주(1주당 금액 5,000원)이고, 납입자본금은 10,728,565,000원이며, 일본법인인 도시바삼성스토리지테크놀러지 주식회사가 위 주식의 50.1%, 주식회사 옵티스가 49.9%를 각 보유하고 있으며, 주식회사 옵티스의 대표이사가 채무자의 대표이사를 겸임하고 있다.

다. 채무자의 최근 5년간 자산·부채 현황과 매출·손익 현황은 아래 표 기재와 같고, 채무자는 신청일 기준으로 부채가 자산을 초과하고 있다.

<5년간 자산·부채 현황> (단위 : 원)

구 분	2016. 3. 31	2015. 3. 31.	2014. 3. 31.	2013. 3. 31.	2012. 3. 31.
유동자산	33,272,600,838	91,170,154,343	98,107,581,114	183,359,893,365	326,620,853,654
비유동자산	31,490,773,338	56,257,655,939	65,360,526,068	44,169,213,531	49,223,140,697
자산총액	64,763,374,176	147,427,810,282	163,468,107,182	227,529,106,896	375,843,994,351
유동부채	86,649,662,302	120,015,246,988	131,612,069,899	169,475,545,943	234,871,656,558
비유동부채	4,513,602,755	2,456,483,671	3,166,391,207	885,599,640	12,293,082,798
부채총액	91,163,265,057	122,471,730,659	134,778,461,106	170,361,145,583	247,164,739,356



<5년간 매출·손익 현황> (단위 : 백만 원)

구 분	2015. 4. 1.~ 2016. 3. 31	2015. 4. 1.~ 2016. 3. 31	2015. 4. 1.~ 2016. 3. 31	2015. 4. 1.~ 2016. 3. 31	2015. 4. 1.~ 2016. 3. 31
매출액	382,728	554,508	814,761	996,825	1,468,473
당기순이익 (당기손실)	(53,304)	(89,055)	(28,478)	(70,207)	13,340

라. 채무자는 광디스크 드라이브 수요의 급격한 감소로 매출이 급감하고 영업손실이 발생하였고, 신사업 진출과 인력 구조조정의 진행이 부진하여 손실이 누적되면서 유동성 부족으로 재정적 파탄에 이르게 되었다.

2. 판단

위 인정사실에 의하면, 채무자는 사업의 계속에 현저한 지장을 초래하지 아니하고는 변제기에 있는 채무를 갚을 수 없는 상황에 처해 있을 뿐만 아니라, 채무자에 파산의 원인인 사실이 생길 염려가 있으므로, 채무자 회생 및 파산에 관한 법률(이하 '법'이라고 한다) 제34조 제1항에 정해진 회생절차 개시사유가 있고, 달리 법 제42조 각 호에

정해진 회생절차 개시신청의 기각사유가 있음을 인정할 만한 자료가 없다.

3. 결론

그렇다면 이 사건 신청은 이유 있으므로 채무자에 대하여 회생절차를 개시하기로 하고, 제74조에 따라 관리위원회의 의견을 참작하여 제3자인 조대성을 관리인으로 선임하기로 하며, 회생채권자·회생담보권자·주주 목록의 제출기간, 회생채권·회생담보권·주식의 신고기간, 회생채권·회생담보권의 조사기간, 회생계획안 제출기간에 관하여는 법 제50조 제1항에 따라 주문과 같이 결정한다.

2016. 6. 16. 11:00

재판장

판사

김정만



판사

심태규



판사

차승환



정본입니다.

2016. 6. 16.

서울중앙지방법원



법원사무관 강호성



※ 각 법원 민원실에 설치된 사건검색 컴퓨터의 발급번호조회 메뉴를  
이용하거나, 담당 재판부에 대한 문의를 통하여 이 문서 하단에 표시된  
발급번호를 조회하시면, 문서의 위,변조 여부를 확인하실 수 있습니다.

위 번역문은 원문과 상위없이  
번역 되었음을 서약합니다

I swear that the attached translation is true  
to original

2016년 06월 28일

June 28th, 2016

번역 행정사:



Signature:

*Yun Ok Park*

등부 2016년 제 P 630

Registered No. 2016-P 630

증명서

Certificate

위 번역문은 본인이 상기와 같이  
원본과 상위없이 번역 하였기에  
행정사법 제 20조 2항에 의거  
번역사실 증명서에  
서명 날인 하였다

The attached document was translated by me  
and further certify that the translation  
is accurate to the original and subscribed  
my name in accordance with Paragraph 2,  
Article 20 of Code of Korea Administrator



2016년 06월 28일  
사무소에서 위 증명을 한다.

This is hereby confirmed on this 28th day  
of June 2016 at the office.

번역행정사 박윤옥  
비즈트랜스 번역행정사사무소

Certified Public Translator Yun-ok Park  
Biztrans Certified public translator's office

대한민국 서울특별시 종로구  
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(전지동, 대성스카이렉스)

102-403 (Gyeonji-dong, Daeseong Skyrex)  
#95, Sambong-ro, Jongno-gu, Seoul, Korea 110-170

행정자치부  
종로구청 인가  
외국어번역행정사 박윤옥  
자격증번호 : 1430108891  
전화 : 02-733-1135



Certified by Ministry of  
Government Administration and Home Affairs  
Certified Public Translator Yun-ok Park  
(Commission No. : 14301088891)  
T : 82-2-733-1135



IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 15
	)	
TOSHIBA SAMSUNG STORAGE	)	Case No. 16-_____ ( )
TECHNOLOGY KOREA CORPORATION,	)	
	)	
Debtor in a Foreign Proceeding. <sup>1</sup>	)	
	)	

**VERIFIED LIST PURSUANT TO RULE 1007(a)(4) OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

I, Dae Sung Cho, pursuant to 28 U.S.C. § 1746, the foreign representative (the “Foreign Representative”) of the above-captioned debtor (the “Debtor”), who has filed for protection under the Debtor Rehabilitation and Bankruptcy Act in the Seoul Central District Court in Seoul, Korea (the “Korean Proceeding”), hereby submit this verified list pursuant to Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure (the “Verified List”) under penalty of perjury under the laws of the United States as follows:

**Administrator of the Debtor in Foreign Proceeding**

1. I, Dae Sung Cho, am the only authorized Foreign Representative in the Korean Proceeding. I certify pursuant to 28 U.S.C. § 1746 under penalty of perjury under the laws of the United States that to the best of my knowledge, information and belief, other than the Korean Proceeding, there are no foreign proceedings pending with respect to the Debtor.

2. My address is: 88 Suwon-ro, Yeongtong-gu 14<sup>th</sup> Flr., Bldg #102, Digital Empire 2, Suwon-si, Gyeonggi-do, 443-734.

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<sup>1</sup> The last four digits of Toshiba Samsung Storage Technology Korea Corporation’s Business Registration Number are 7441. The Debtor’s main corporate and mailing address is 88 Suwon-ro, Yeongtong-gu 14<sup>th</sup> Flr., Bldg #102, Digital Empire 2, Suwon-si, Gyeonggi-do, 443-734.



**Litigation Parties in the United States**

3. I certify pursuant to 28 U.S.C. § 1746 under penalty of perjury under the laws of the United States to the best of my knowledge, information, and belief, that attached hereto as **Exhibit 1** is a true and correct copy of a list of the names and addresses of all parties to litigation which has been commenced and is pending in the United States in which the Debtor is a party at the time of the filing of this Petition.

**Entities Against Whom Provisional Relief is Sought Pursuant to 11 U.S.C. § 1519**

4. I certify pursuant to 28 U.S.C. § 1746 under penalty of perjury under the laws of the United States to the best of my knowledge, information, and belief, that attached hereto as **Exhibit 2** is a true and correct copy of a list of the names and addresses of substantially all entities against whom provisional relief is sought pursuant to 11 U.S.C. § 1519.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 5th day of July, 2016

By: /s/ Dae Sung Cho  
Name: Dae Sung Cho  
Title: Foreign Representative of Toshiba Samsung  
Storage Technology Korea Corporation

10205533.1

**Exhibit 1**

**Parties to Litigation Pending in the United States**

Name	Company	Address	Address	State	Zip	Country	Market No.	Fac No.	Client Represented	Telephone No.	Email
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Table with 13 columns: Name, Address, City, State, Zip, Phone, Email, and other details. Rows list various individuals and companies such as Michael Jean Dominguez, Mac Jeffrey Grossman, Todd Anthony Swaver, and various law firms like Cohen Milstein Seligson & Tor.

Table with 13 columns: Name, Address, City, State, Zip, Phone, Email, and other details. Rows list various individuals and companies such as Michael Jean Dominguez, Mac Jeffrey Grossman, Todd Anthony Swaver, and various law firms like Cohen Milstein Seligson & Tor.





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	1-1 Shi-ogaru	Kumagawa		212-0031	Japan	mmf78707	
	Power Digital Design & Manufacturing Comp	Kumagawa		212-0031	Japan	mmf78707	
Pioneer Electronics (USA) Inc	2710 Gateway Oaks Drive	Sacramento	CA	95833	R.O.C	mmf78707	
	13th Fl. No. 44	Taipei City		114	Taiwan	mmf78707	
	8F No. 407						202-783-0031
Pioneer North America Inc	2710 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
	1310 Hollister Avenue	Sunnyvale	CA	94087		mmf78707	
Quanta Storage America Inc	2726 Bayview Drive	Fremont	CA	94538		mmf78707	
	2726 Bayview Drive	Fremont	CA	94538		mmf78707	
Quanta Storage Inc	3F No. 180 Wenhua 2nd Rd.	Taiwan County		333	Taiwan	mmf78707	
Quanta Storage Inc	607 14th Street NW	Washington	DC	20005		mmf78707	
Quanta Storage Inc	1330-1-10, Seodcho 2-ONG	Seoul	DC	137-457	South Korea	mmf78707	
Samsung Electronics Co. Ltd	Samsung Medi Building 250	Seoul		100-742	South Korea	mmf78707	
Samsung Electronics Co. Ltd	1-1 Shibaura, 1-Home	Mitaka-ku		100-742	Japan	mmf78707	
Samsung Storage Technology Corporation	2726 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
	1310 Hollister Avenue	Fremont	CA	94087		mmf78707	
	22-22 Nagatsuke-cho	TKY		108-0075	Japan	mmf78707	
Sony Corporation	1-7-1, Konan	San Diego	CA	92127		mmf78707	
Sony Electronics Inc	16330 Via Esprillo	Sacramento	CA	95833		mmf78707	
Sony Electronics Inc	2710 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
Sony Electronics Inc	2730 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
Sony Electronics Inc	355 Madison Avenue	New York	NY	10022		mmf78707	
Sony Optics America Inc	4770 Via Esprillo	San Jose	CA	95128		mmf78707	
Sony Optics America Inc	1730 N. First Street	Sacramento	CA	95812		mmf78707	
Sony Optics America Inc	2730 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
Sony Optics America Inc	4-16-1 Ochiai	Kumagawa		203-002 1	Japan	mmf78707	
TEAC America Inc	2730 Gateway Oaks Drive	Sacramento	CA	95833		mmf78707	
TEAC Corporation	7733 Telegraph Road	Montebello	CA	90640		mmf78707	
TEAC Corporation	47 Dohari	TKY		208-8330	Japan	mmf78707	
Tomita America Information Systems	8740 Irvine Blvd	Irvine	CA	92718-1897		mmf78707	
Tomita America Information Systems Inc.	818 W. Siyemithi Drive	Irvine	CA	92718-1897		mmf78707	
Tomita Storage Technology Corp Korea	1-1 Shibaura 1-Home	Los Angeles	CA	90017		mmf78707	
Tomita Storage Technology Corp	Digital Empire 2, 416-1, Shin-dong	Yongju-gu		102-8001	South Korea	mmf78707	
Tomita Storage Technology Corp	1-1 Shibaura, 1-Home	Yongju-gu		443-734	South Korea	mmf78707	
Tomita Storage Technology Corp	1-1 Shibaura, 1-Home	Yongju-gu		105-8001	South Korea	mmf78707	
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LG Electronics, Inc., LG Electronics USA, Inc.

**Exhibit 2**

**Entities Against Whom Provisional Relief is Sought Pursuant to 11 U.S.C. § 1519**







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David Bedford Esau Eric Seiger Helwig James Lin Kawan Ting	Carlton Falde PA TechKnowledge Law Group LLP	525 Otecashobee Blvd. 100 Marine Parkway 100 Marine Parkway	West Palm Beach Plymouth Shores Plymouth Shores	FL CA CA	33001 94065 94065	mi/07/07 mi/07/07 mi/07/07	561-453-7070 650-517-5200 650-517-5200	Acer America Corporation; Gateway, Inc.; Gateway U.S. Retail, Inc.	561-453-7070 650-517-5200 650-517-5200	deasa@carltonfalde.com esauj@tkg-lp.com falde@tkg-lp.com
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Pioneer Digital Design & Manufacturing Comp	1-1 Shin-ogura	Kanagawa	JP	212-0031	Japan	mi78707	
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Pioneer High Fidelity Taiwan Co. Ltd	13th Fl. No. 44	Taipei	RO	114	Taiwan	mi78707	
Pioneer High Fidelity Taiwan Co. Ltd	BF No. 407	Taipei	RO	114	Taiwan	mi78707	Registered Agent
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Quanta Storage America Inc	1310 Hollback Avenue	Sacramento	CA	95833	United States	mi78707	Registered Agent
Quanta Storage America Inc	2726 Bayview Drive	Fremont	CA	94538	United States	mi78707	
Quanta Storage America Inc	4944 Cliper Court	Fremont	CA	94538	United States	mi78707	Registered Agent
Retinal Flow Inc.	8811 Wilshire 2nd Fl.	Los Angeles	CA	90048	United States	mi78707	
Samsung Electronic Co. Ltd.	1320-10, Secho 2-Dong	Seoul	KR	152-800	South Korea	mi78707	Registered Agent
Samsung Electronics America Inc.	85 Challenger Road	Scottsdale	AZ	85260	United States	mi78707	
Samsung Electronics Co. Ltd.	Samsung Main Building 280	Seoul	KR	150-742	South Korea	mi78707	Registered Agent
Samsung Storage Technology Corporation	1-1, Shibaura, 1-chome	Osaka	JP	545-0852	Japan	mi78707	
Sony Computer Entertainment America Inc.	2730 Gateway Oaks Drive	Sacramento	CA	95833	United States	mi78707	Registered Agent
Sony Computer Entertainment America Inc	518 East Hillside Blvd.	Los Angeles	CA	90004	United States	mi78707	
Sony Corporation	1-1-1, Chuo-ku	Osaka	JP	545-0852	Japan	mi78707	Registered Agent
Sony Electronics Inc.	15320 Via Esprillo	San Diego	CA	92127	United States	mi78707	
Sony Electronics Inc.	2710 Gateway Oaks Drive	Sacramento	CA	95833	United States	mi78707	Registered Agent
Sony Electronics Inc.	2730 Gateway Oaks Drive	Sacramento	CA	95833	United States	mi78707	
Sony Electronics Inc.	555 Madison Avenue	New York	NY	10022	United States	mi78707	Registered Agent
Sony NEC Optarc Inc.	4-16-1, Ohta	Kanagawa	JP	243-0221	Japan	mi78707	
Sony Optarc America Inc	1720 N. First Street	San Jose	CA	95112	United States	mi78707	Registered Agent
Sony Optarc America Inc	2730 Gateway Oaks Drive	Sacramento	CA	95833	United States	mi78707	
Sony Optarc Inc.	4-18-1, Ohta	Kanagawa	JP	243-0021	Japan	mi78707	Registered Agent
TEAC America Inc.	2730 Gateway Oaks Drive	Sacramento	CA	95833	United States	mi78707	
TEAC Corporation	7733 Tokugawa Road	Tokyo	JP	208-8530	Japan	mi78707	Registered Agent
TEAC Corporation	47 Otsai	Tokyo	JP	94065	Japan	mi78707	
Technology Law Group LLP	100 Marine Parkway	Redwood Shores	CA	94065	United States	mi78707	Registered Agent
Technis America Information Systems	9740 Irvine Blvd	Irvine	CA	92718-1687	United States	mi78707	
Teclab America Information Systems Inc.	818 W. Seventh Street	Los Angeles	CA	90017	United States	mi78707	Registered Agent
Teclab Corporation	1-1, Shibaura 1-chome	Tokyo	JP	105-8001	Japan	mi78707	
Teclab Samsung Storage Technology	Digital Empire 2, 148-1, Shin-dong	Gyeonggi-do	KR	443-734	Korea	mi78707	Registered Agent
Teclab Samsung Storage Technology Corp	1-1, Shibaura, 1-chome	Tokyo	JP	105-8001	Japan	mi78707	
Teclab Samsung Storage Technology Corp Korea	148 Fl. Bldg. 102 Digital Empire 2	Gyeonggi-do	KR	443-734	Korea	mi78707	Registered Agent
Verion Elixir LLP	2300 Pummawone Avenue NW	Washington	DC	20037	United States	mi78707	
Retinal Flow Inc. & Mmbeck PC	807 14th St.	Washington	DC	20005	United States	mi78707	Registered Agent
DJA Paper LLP	2000 University Avenue	Washington	DC	20005	United States	mi78707	
Calvert Proprietary Systems Inc.	1660 Blake Street	East Palo Alto	CA	94303-2248	United States	mi78707	Registered Agent
Kral Omack Inc.	8023 Columbine Road	Round Rock	TX	78682	United States	mi78707	
Compliance, System One Holdings, LLC	915 Wilshire Boulevard	Los Angeles	CA	90017	United States	mi78707	Registered Agent
Compliance Research	11th Embarrasdeno Center	San Francisco	CA	94111	United States	mi78707	

LG Electronics Inc. (Pro Hac Vice)

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  TOSHIBA SAMSUNG STORAGE TECHNOLOGY KOREA CORPORATION,  Debtor in a Foreign Proceeding. <sup>1</sup>	) ) ) ) ) ) ) )	Chapter 15  Case No. 16-_____ ( )
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**FOREIGN REPRESENTATIVE'S STATEMENT  
REGARDING KNOWN FOREIGN PROCEEDINGS**

I, Dae Sung Cho, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States as follows:

1. I am the duly appointed foreign representative (the “Foreign Representative”) of Toshiba Samsung Storage Technology Korea Corporation (“TSST-K” or the “Debtor”) in connection with the pending proceeding (the “Korean Proceeding”) filed under the Debtor Rehabilitation and Bankruptcy Act in the Seoul Central District Court in Seoul, Korea (the “Korean Court”).

2. I respectfully submit this statement, as required under section 1515(c) of title 11 of the United States Code (the “Bankruptcy Code”), in support of the verified chapter 15 petition filed by the Foreign Representative seeking recognition by the United States Bankruptcy Court for the District of Delaware of the Korean Proceeding as a foreign main proceeding.

3. Pursuant to the requirements of section 1515(c) of the Bankruptcy Code, to my knowledge, the Korean Proceeding is the only insolvency proceeding of any kind pending with respect to TSST-K and, thus, is the only known “foreign proceeding” with respect to TSST-K, as that term is defined in section 101(23) of the Bankruptcy Code.

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<sup>1</sup> The last four digits of Toshiba Samsung Storage Technology Korea Corporation’s Business Registration Number are 7441. The Debtor’s main corporate and mailing address is 88 Suwon-ro, Yeongtong-gu 14<sup>th</sup> Flr., Bldg #102, Digital Empire 2, Suwon-si, Gyeonggido, 443-734.

I declare under penalty of perjury under the laws of the United States of America that, based upon my knowledge, information and belief as set forth herein, the foregoing is true and correct.

Executed this 5th day of July, 2016.

*/s/ Dae Sung Cho*

By: Dae Sung Cho

*Foreign Representative of Toshiba Samsung  
Storage Technology Korea Corporation*

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 15
	)	
TOSHIBA SAMSUNG STORAGE	)	Case No. 16-_____ ( )
TECHNOLOGY KOREA CORPORATION,	)	
	)	
Debtor in a Foreign Proceeding. <sup>1</sup>	)	
	)	

**CORPORATE OWNERSHIP STATEMENT**

Pursuant to Federal Rule of Bankruptcy Procedure 1007(a)(4), the following are corporations, other than a governmental unit, that directly or indirectly own 10% or more of any class of the Debtor’s equity interests. Toshiba Samsung Storage Technology Corporation (Japan) owns 50.1%, and Optis Company, Ltd. (Korea) owns 49.9%, of the shares of Toshiba Samsung Storage Technology Korea Corporation.

Dated: July 5, 2016  
Wilmington, Delaware

MORRIS NICHOLS ARSHT & TUNNELL LLP

/s/ Curtis S. Miller

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*Attorneys for the Foreign Representative*

10205438.1

<sup>1</sup> The last four digits of Toshiba Samsung Storage Technology Korea Corporation’s Business Registration Number are 7441. The Debtor’s main corporate and mailing address is 88 Suwon-ro, Yeongtong-gu 14<sup>th</sup> Flr., Bldg #102, Digital Empire 2, Suwon-si, Gyeonggido, 443-734.



**VERIFICATION OF CHAPTER 15 PETITION**

Pursuant to 28 U.S.C. § 1746, Dae Sung Cho declares as follows:

I am the duly appointed foreign representative (the "Foreign Representative") of Toshiba Samsung Storage Technology Korea Corporation (the "Debtor") in connection with the pending proceeding (the "Korean Proceeding") filed under the Debtor Rehabilitation and Bankruptcy Act in the Seoul Central District Court in Seoul, Korea (the "Korean Court"). I have full authority to verify the foregoing chapter 15 petition for recognition of a foreign main proceeding, including each of the attachments thereto (collectively, the "Petition"), and I am informed and believe that the allegations contained therein are true and accurate to the best of my knowledge, information and belief. A true and accurate copy of the Order dated June 16, 2016 by the Korean Court (the "Korean Commencement Order") is attached as **Exhibit A** to the Petition.

I declare under penalty of perjury under the laws of the United States of America that, based upon my knowledge, information and belief as set forth herein, the foregoing is true and correct.

Executed this 5th day of July, 2016.

*/s/ Dae Sung Cho*  
\_\_\_\_\_

By: Dae Sung Cho

*Foreign Representative of Toshiba Samsung  
Storage Technology Korea Corporation*