

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 13-18620 CA 13

CHIRAG AMIN,

Plaintiff,

vs.

GIGNESH MOVALIA and
OM GLOBAL INVESTMENT FUND LLC,

Defendants.

**CORPORATE MONITOR'S MOTION FOR
ENTRY OF ORDER AUTHORIZING SECOND INTERIM
DISTRIBUTION AND ON DISPOSITION OF CLAIMS, INCLUDING LATE CLAIMS**

James D. Sallah, not individually but solely in his capacity as the court-appointed Corporate Monitor (the "Corporate Monitor") for Defendant OM Global Investment Fund LLC and OM Global LP (collectively, "OM Global"), moves this Court for entry of the attached Order (Exhibit E) authorizing the Corporate Monitor to make a second interim distribution to the claimants with "allowed claims"¹ in the updated Allowed Claims Matrix (Exhibit A) and to the

¹ "Allowed claims" include: (1) previous claimants who timely filed claims to which the Corporate Monitor did not object; (2) previous claimants who timely responded to the Corporate Monitor's objection and whose claim was resolved; (3) previous claimants who did not respond to the Corporate Monitor's objection on a recommended claim amount and thus whose claim was treated in accordance with the Corporate Monitor's recommended amount; and (4) the claimants who filed late claims to which the Corporate Monitor has no objection.

late claimants with “allowed claims” in the Late Claims Matrix (Exhibit C). The Corporate Monitor also moves for the disposition of certain claims, such as the late claims.

I. Introduction

In May 2013, the Court appointed the Corporate Monitor. One of the Corporate Monitor’s primary duties is to repay OM Global’s investors, who are collectively owed from the defunct OM Global fund over \$14 million in submitted “allowed claims.”

In October 2013, the Corporate Monitor mailed approximately 300 proof of claim forms to known potential claimants in OM Global. The Corporate Monitor previously developed the claim form, which the Court approved. The Corporate Monitor ultimately received nearly 200 proof of claim forms from purported investors and creditors.

As part of reviewing each claim form, the Corporate Monitor confirmed whether each claimant sent funds to OM Global and/or received funds from OM Global to determine each investor’s *net* claim amount. The Corporate Monitor accomplished this by reviewing his accountant’s cash-in/cash-out reconstruction for each claimant.

In March 2014, the Court authorized the Corporate Monitor to make a first interim distribution of \$2,250,000 to investors of OM Global Investment Fund LLC with “allowed claims.” The rate of return for the first distribution was approximately 14% back to investors with “allowed claims.” The Corporate Monitor is now prepared to make a second interim distribution of \$1,000,000 to investors with “allowed claims.” The rate of return for the proposed second distribution is approximately 7% back to investors with “allowed claims.” Therefore, after making the second distribution, investors of OM Global Investment Fund LLC with “allowed claims” will have received approximately 21% of their principal investment back.

The proposed second distribution will be to the investors of OM Global Investment Fund LLC with “allowed claims.” There will be no second distribution, as of this time, to investors of OM Global LP (the other entity subject to the monitorship) with “allowed claims.” There are only two claimants of OM Global LP, both of whom had “allowed claims.” The Corporate Monitor previously made a Court-approved first distribution of approximately \$61,000 to the two OM Global LP claimants, which represented a return of approximately 35% of their funds.

II. The First Distribution

A. Summary of Procedure²

In March 2014, the Corporate Monitor obtained Court-approval to make his first interim distribution in the amount of \$2,250,000 to investors of OM Global Investment Fund LLC with “allowed claims.” Many claim forms initially had some type of deficiency, many of which were easily cured by the claimant (such as providing proof of identity, agreeing to the Corporate Monitor’s recommended claim amount, or producing the requested records).³ Once the deficiency was cured, the claimant then automatically had an “allowed claim” under the protocol that the Corporate Monitor developed and the Court approved. And the proposed cure period, which was self-executing, worked efficiently as planned and helped to cure the majority of the initially deficient claims, which then allowed the Corporate Monitor to issue first distribution checks promptly without further Court Order or delay.

² The Corporate Monitor previously filed a Motion delineating the claims and distribution procedures, which the Court approved.

³ Some investors did not include the bank records confirming their investment, but most deficiencies were cured by the Corporate Monitor when he assembled the bank records to track each investor’s investment.

In short, and as the Corporate Monitor hoped for, there were no “disputed claims” after the cure period expired. The formula for calculating the first distribution checks was as follows: the amount of the “allowed claim” divided by the total amount of submitted claims as of the first distribution (\$15,907,872.02), multiplied by the first distribution amount (\$2,250,000.00).

B. Disputed Claims

There were several claimants who submitted claims to which the Corporate Monitor objected in his Motion for First Distribution. These claimants had the right to respond in writing within 45 days and disagree with the Corporate Monitor’s objection to, or recommended disposition of, their claim. At that point, such claims would become “disputed claims,” after which the claimant and the Corporate Monitor would have 90 days to resolve such “disputed claims.” The Corporate Monitor served on such claimants the Corporate Monitor’s objection with a self-explanatory cover letter explaining the procedure.

The Corporate Monitor was able to resolve objections with the majority of claimants who submitted claims to which the Corporate Monitor objected. As stated above, most objections were resolved by the claimant providing the necessary bank records supporting his/her claim, providing a copy of his/her driver’s license, or agreeing to the Corporate Monitor’s proposed claim amount. These claimants are now included as “allowed claims” in the updated Allowed Claims Matrix (Exhibit A).

However, there were some remaining claimants who, despite the Corporate Monitor’s objection to their claim, never responded to or formally contested the Corporate Monitor’s objection to, or recommended disposition of, their claim. As such, there were no “disputed claims.” These claimants who, despite the Corporate Monitor’s objection to their claim, never

contested in writing the Corporate Monitor's objection to completely disallow their claim are now deemed to have a "disallowed claim," as discussed below.

C. Disallowed Claims

If the Corporate Monitor objected to paying a claim and that claimant did not respond to the Corporate Monitor's objection, the objection was deemed sustained and the claim denied. The previously-approved procedure through Court Order was the following:

The holders of claims to which the Corporate Monitor has objected, in whole or in part, and/or counterclaimed, will have forty-five (45) calendar days from the date of service of the objections and/or counterclaims within which to cure the deficiency and/or to respond to the Corporate Monitor in writing. . . . If a claimant responds and does not adequately cure, the claimant's claim will be subject to the Objection Procedure as a "disputed claim." If a claimant does not respond within the time provided, the Corporate Monitor's objections and/or counterclaims will be deemed sustained and adjudicated with prejudice, and the claim will be treated in accordance with the Corporate Monitor's objections and/or counterclaims.⁴

Because the Corporate Monitor objected to paying certain claims and because these claimants did not respond in writing to the Corporate Monitor's objection, the objection has been deemed sustained and the claims deemed denied. These claims are called "disallowed claims." The "disallowed claims" are listed in the Disallowed Claims Matrix attached as Exhibit B.

D. Late Claims

The Corporate Monitor received some additional claims after filing his Motion for First Distribution. The Corporate Monitor has designated these as "late claims." In total, the Corporate Monitor received only two late claims, which he has since analyzed. The Court-approved claims

⁴ "Disallowed claims," therefore, include the claimants who did not timely respond to the Corporate Monitor's objection, and whose claims should be disallowed in accordance with the Corporate Monitor's recommended treatment in the objection.

procedure permitted the Corporate Monitor to address late claims on a case-by-case basis, using his discretion.

The Corporate Monitor has recommended to allow the two late claims, which is reflected in the Late Claims Matrix attached as Exhibit C.

The Corporate Monitor is able to issue distribution checks – as part of the first distribution – to the two late claimants with “allowed claims,” as described in the Late Claims Matrix, because there is enough in reserve from the “disallowed claims” from the first distribution. For example, the claim amounts for “disallowed claims” total \$1,563,659.85, so that amount now remains to pay the late claimants with “allowed claims” (there is only \$15,000 in “allowed” late claims). This surplus has permitted the Corporate Monitor to now move in this Motion for authority to make a “catch-up” first distribution to the two late claimants with “allowed claims” pursuant to the formula from the first distribution. As such, no claims have been rejected because they were late.

III. Requested Relief

A. First Distribution for Late Claims

First, the Corporate Monitor respectfully requests permission to make a first interim distribution to the two late claimants with “allowed claims,” according to the formula from the first distribution and according to the claim amounts in the Late Claims Matrix (Exhibit C).

B. Second Distribution for Allowed Claims, Including Late Claims

Second, the Corporate Monitor respectfully requests permission to make a second interim distribution of \$1,000,000 to claimants with “allowed claims” in the updated Allowed Claims Matrix (Exhibit A) and the Late Claims Matrix (Exhibit C), according to their respective authorized claim amounts and based on the procedures previously approved by the Court. Below is a summary of the Court-approved procedures.

The Corporate Monitor was authorized to make distributions on a pro-rata⁵ basis based on the investor's or creditor's proportionate share of the total amounts invested by or owed to all investors and creditors in OM Global. The claim amount for each investor was a net claim amount, which represents all amounts invested by that investor subtracted by all amounts received by that investor outside of this proceeding.

At the same time, the Corporate Monitor has determined the total dollar amount of all investments into, and other claims against, OM Global Investment Fund LLC (the "Investment Claim Total"). For purposes of this second distribution, the Investment Claim Total is \$14,201,001.09.⁶ It is a different amount, and less, than the Investment Claim Total for the first distribution (which was \$15,907,872.02), because: (1) the "disallowed claims" have been removed (which has reduced the number); (2) certain claimants with claims to which the Corporate Monitor objected agreed with the Corporate Monitor's proposed claim amount (which has, in most instances, reduced the number); and (3) the late claims have been included (which has increased the number). Like the first distribution, the Corporate Monitor has determined a percentage that corresponds to each investor's share of the Investment Claim Total (the "Investment Claim Percentage").⁷

Like the first distribution, each "allowed" claimant has received and/or will receive a fixed percentage of his/her "allowed claim" from the proposed distribution amount, based on the

⁵ "Pro-rata" means that each claimant with an allowed claim receives a distribution, the amount of which is calculated as follows: the amount to be distributed to all claimants (*i.e.*, \$1,000,000) multiplied by a fraction, the numerator of which is the amount of the claimant's allowed claim and the denominator of which is the total of all claims.

⁶ The Corporate Monitor calculated this number by adding the total claim amounts in Exhibits A and C (*i.e.*, \$14,186,001.09 + \$15,000.00 = \$14,201,001.09).

⁷ For example, if the Investment Claim Total was \$50 million, and John Smith invested \$5 million, then John Smith's Investment Claim Percentage would be 10% of the Investment Claim Total.

following formula: the amount of the net “allowed claim” divided by the total amount of claims multiplied by the proposed distribution amount.⁸

The updated Allowed Claims Matrix and Late Claims Matrix list each claimant’s name in alphabetical order. The claim amount in the proposed second distribution for “allowed claims” is \$14,201,001.09.⁹ The Matrices do not list any pending objections because all other objections were previously resolved and/or deemed sustained as a matter of law after expiration of the cure period.

As previously authorized, the holders of “allowed claims” will be paid by the Corporate Monitor upon an Order from the Court granting the recommended second distribution. Payments by the Corporate Monitor will be made by check and must be cashed within 180 calendar days, absent which the check will be voided, the uncashed checks will be deemed “unclaimed funds” available for distribution to other investors, and the claim may be deemed expunged and waived. The Corporate Monitor has been authorized in his discretion to withhold issuing checks for future distributions to claimants who have not cashed checks from a prior distribution. However, there

⁸ There is one claimant with an “allowed claim” in Exhibit A who will be receiving a distribution amount in a different manner than the other “allowed claims.” The investor is Paresh Shukla, whose claim the Corporate Monitor initially objected to until the total distribution return exceeded the rate of return for his redemption of his investment. Mr. Shukla’s redemption was approximately 18% of his principal investment. Because the first distribution was less than 18% – *i.e.*, it was approximately 14% – the Corporate Monitor objected to paying Mr. Shukla’s claim until the total distribution return exceeded 18%. Now that the total distribution return is approximately 21%, and thus more than Mr. Shukla’s 18% redemption return, the Corporate Monitor has no objection to making a partial second distribution in an amount which catches him up to the 21% return that will be made as of the second distribution to the other investors of OM Global Investment Fund LLC with “allowed claims.” The Corporate Monitor has also confirmed with Mr. Shukla this procedure and the distribution amount to be paid to him, and Mr. Shukla has no objection.

⁹ Again, the Corporate Monitor calculated this number by adding the total claim amounts in Exhibits A and C.

was only one claimant who has not cashed his first distribution check despite the Corporate Monitor's efforts to contact this claimant. The Corporate Monitor still intends to send this claimant his second distribution check as a courtesy and will continue to attempt to contact this claimant.

Pursuant to the Court-approved procedures, the Corporate Monitor will be serving a copy of this Motion on the claimants, and will be simultaneously providing a cover letter, a copy of which is attached as Exhibit D, explaining in "plain English" the distribution procedure, so the claimants understand what to do and how to do it. Moreover, the Corporate Monitor will further update the claimants by posting this filing on the monitorship website (www.om-monitor.com), as well as updating the "Recent News" section of the website regarding this filing (the Corporate Monitor has previously updated investors, on a repeated basis, by posting on the website relevant filings, posting letters to investors, and updating the "Recent News" section).

Attached as Exhibit E is a proposed Order which authorizes the Corporate Monitor to make: (1) a first interim distribution to the late claimants with "allowed claims" in the Late Claims Matrix (Exhibit C), pursuant to the first distribution procedure; and (2) a second interim distribution in the amount of \$1,000,000 to claimants with "allowed claims" in the updated Allowed Claims Matrix (Exhibit A) and Late Claims Matrix (Exhibit C), pursuant to the procedure discussed above.

C. Disallowed Claims

The Corporate Monitor requests that this Court formally disallow the claims listed in the Disallowed Claims Matrix (Exhibit B), so their claims are formally disallowed in a Court Order. The proposed Order attached as Exhibit E formally disallows these claims.¹⁰

¹⁰ There is one claimant with a "disallowed claim" in Exhibit B – Dipesh Parekh – who, during the cure period, had the right to prove his purported investment in OM Global but who has not done so as of this filing. In the event that Mr. Parekh sufficiently proves his investment after entry

WHEREFORE, the Corporate Monitor respectfully requests that the Court issue the proposed Order attached as Exhibit E which authorizes the Corporate Monitor to: (1) make a first interim distribution to the late claimants with “allowed claims” in the Late Claims Matrix (Exhibit C), pursuant to the first distribution procedure; and (2) make a second interim distribution in the amount of \$1,000,000, pursuant to the above-described procedure, which is in accordance with the procedures approved in the prior Order on making distributions, to claimants with “allowed claims” in the updated Allowed Claims Matrix (Exhibit A) and Late Claims Matrix (Exhibit C). The Corporate Monitor also respectfully requests that the Court issue the proposed Order which disallows the claims listed in the Disallowed Claims Matrix (Exhibit B).

Respectfully submitted,

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And

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of the Order disallowing the “disallowed claims,” the Corporate Monitor requests authorization in a self-executing manner without the need for another Court Order to allow and pay the claim pursuant to the procedure discussed above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail on this 13th day of February, 2015, upon Chirag Amin, Gignesh Movalia, and Gary Klein, Esq., The Klein Law Group, 7832 Red Mahogany Road, Boynton Beach, Florida 33437.

s:/Patrick J. Rengstl, Esq.
Patrick J. Rengstl

EXHIBIT A: ALLOWED CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF ALLOWED CLAIM
Agarsen Investments Ltd.		090	\$600,000.00
Alpert	Myles	046	\$950,000.00
Amin	Monel	142	\$25,000.00
Ancona	Richard	053	\$25,000.00
Ashley	Richard	156	\$31,500.00
Beatrice Alpert Irrevocable Trust		047	\$104,000.00
Bhatnagar	Ajay	019	\$50,000.00
Bhoola	Snehal	083	\$50,000.00
Bindal	Pawan	091	\$65,000.00
Borhan	Ali	125	\$100,000.00
BROXAS LLC		100	\$390,000.00
Bruno	Christopher	077	\$10,000.00
Chander	Subhash	095	\$10,000.00
Chhabhaya	Chatur	175	\$32,000.00
Chhabra	Rohit	152	\$10,000.00
Choi	Helena	088	\$35,000.00
Chokshi	Samir & Jhankana	128	\$10,000.00
Chokshi	Harsha	129	\$10,000.00
Choksi	Parag	135	\$20,000.00
Chong	Woojae	011	\$10,000.00
Chopra	Rohit	151	\$60,000.00
Creech	David	147	\$10,000.00
Dalsania	Amar	044	\$50,000.00
Degala	Sree Lalitha	146	\$52,000.00
Desai	Nimesh & Priti	008	\$250,000.00
Desai	Neel	010	\$21,000.00
Desai	Neha	016	\$8,000.00
Desai	Tejal P	049	\$5,000.00
Dhaduk	Vithal (Darpan, Amar, and Payal Dhaduk)	111	\$2,000,000.00
Dhanani	Tribhovan & Rina	068	\$200,000.00
Dhanani	Tulsi	181	\$25,000.00
Dhir	Saloni	037	\$7,500.00
Dixon	Yvonne	117	\$20,000.00
Dudhat	Vinod	065	\$200,000.00
Dudhat	Keyur	066	\$70,000.00
Dudhat	Jagdish	107	\$150,000.00
Dudhat	Dilip	163	\$35,000.00

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CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF ALLOWED CLAIM
FCRx, Inc.		006	\$25,000.00
Gali	Siva	085	\$10,000.00
Gaw	Scott	124	\$8,000.00
Gaw Stern	Delaine	149	\$25,000.00
Ghia	Kavita	062	\$5,000.00
Ghia	Ketan	063	\$11,000.00
Ghia	Bipin	064	\$10,000.00
Gnanamurthy & Pushparani Jayapal	Kumaresan	002	\$50,000.00
Gruber	James	126	\$31,500.00
Gupta	Divakar & Rupal	089	\$31,500.00
Heintzen	Guian	155	\$31,500.00
Hiremath	Keerthivardhan	108	\$25,000.00
Hirpara	Jayanti	033	\$25,000.00
Hong	Yoon Mark	132	\$79,700.00
IRA Express, Inc. FBO Jigar Langhanoja		113	\$24,000.00
IRA Express, Inc. FBO Nirju Langhanoja		114	\$6,000.00
Jain	Sudhanshu	081	\$48,500.00
Jariwala	Mihir	024	\$5,000.00
Johri	Amit	182	\$60,000.00
Kansagra	Ankit	127	\$15,000.00
Karimi	Sultanli & Gulshanara	143	\$36,000.00
Karlovsky	Matthew	034	\$50,000.00
Khan	Abdussami	018	\$20,000.00
Krishna	Sistla	061	\$100,000.00
Krishna	Vamsi	087	\$30,000.00
Krishnamurthy	Muthukrishanan	038	\$10,650.00
Krishnan	Yamini	059	\$30,000.00
Kukreja	Jeetendra	078	\$10,000.00
Kumar	Dinesh	172	\$5,000.00
Lakshmanan	Hariharan	084	\$20,120.00
Laxpati	Jatin & Shaila	069	\$50,000.00
Lee	Jack Ssu-Chieh	105	\$32,500.00
Lee	Kyungmi Kaitlin	169	\$3,150.00
LI Capital Partners LLC		039	\$21,450.00
Lin	Euger	120	\$105,000.00
Lin	Kimberly	121	\$8,000.00

EXHIBIT A: ALLOWED CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF ALLOWED CLAIM
Lin	Andon & Kimberly	122	\$26,000.00
Lin	Maile	123	\$26,000.00
Lodhavia	Rajendra	080	\$50,000.00
Mahadev Trust	(Parameshwaran)	051	\$10,000.00
Mahadevan	Karthik & Gowri Thiagarajan	023	\$10,350.00
Malapati	Nagasudha	157	\$25,000.00
McMahon	Douglas	040	\$11,000.00
Mehta	Bimal	056	\$25,000.00
Mehta	Manish	154	\$10,000.00
Moroney	Thomas	073	\$20,000.00
Movalia	Hitesh	134	\$265,000.00
Mullah	Samira	015	\$60,000.00
Muthusamy	Ravi	027	\$10,000.00
Nanavati	Shardul & Prathima Moorthy	036	\$50,000.00
Natarajan	Indu	045	\$21,000.00
Natu	Aditya	048	\$25,000.00
Noorani	Ashraf	017	\$50,000.00
Padalia	Mansukhlal	009	\$100,000.00
Padalia	Devang	101	\$105,000.00
Panchal	Nikul & Anupana	096	\$100,000.00
Park	John & Patty	050	\$10,000.00
Patel	Nileshkumar	001	\$10,000.00
Patel	Pratik	003	\$50,000.00
Patel	Rakesh	004	\$50,000.00
Patel	Amitkumar	012	\$722,878.00
Patel	Akshay	013	\$1,960,134.00
Patel	Deepan	025	\$17,500.00
Patel	Indravadan	026	\$50,000.00
Patel	Bharat	028	\$25,000.00
Patel	Raju	029	\$50,000.00
Patel	Sanket & Bhoomika	030	\$10,000.00
Patel	Sarjan	052	\$50,000.00
Patel	Monali	055	\$50,000.00
Patel	Gordhan	067	\$50,000.00
Patel	Chatur	094	\$25,000.00
Patel	Ghanshyam & Shakuntaka	103	\$8,750.00
Patel	Roshni	104	\$8,750.00

EXHIBIT A: ALLOWED CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF ALLOWED CLAIM
Patel	Deepak M.	112	\$25,000.00
Patel	Mitul	118	\$15,000.00
Patel	Minesh	133	\$25,000.00
Patel	Minesh	144	\$50,000.00
Patel	Kamlesh	164	\$99,000.00
Patel	Rakesh	178	\$33,950.00
Patel	Haresh	177	\$10,000.00
Patidar	Kirit	020	\$220,845.00
Patidar	Aditi	021	\$135,897.97
Ponas	Stephan	086	\$100,000.00
R&P Investment of NC, Inc.		150	\$50,000.00
Radhakrishnan	Jothishankar	058	\$32,000.00
Rajdev	Neal & Kim	102	\$20,000.00
Rajendran	Kathamuthu	074	\$90,000.00
Ramani	Chandulal	106	\$25,000.00
Ramaraj	Radhakrishnan	076	\$30,000.00
Rayudu	Prasana Chandragiri	079	\$5,000.00
Reddy	Satish	145	\$10,000.00
Sansur Associates LLC		041	\$100,000.00
Santhanakrishnan	Senthilkumar	071	\$40,950.00
Saoji	Deepa	098	\$11,000.00
Saoji	Mayuresh	099	\$12,000.00
Savani	Tulsi	031	\$20,000.00
Sekhadia	Ashok	043	\$36,167.00
Shah	Jagdish	007	\$6,300.00
Shah	Rajnikant & Rita	054	\$35,000.00
Shah	Girish & Anjana	075	\$7,000.00
Shah	Sujal	082	\$50,000.00
Shah	Sanjay	130	\$33,600.00
Shah	Sapan & Sehba	174	\$3,500.00
Sharma	Anoop	110	\$50,000.00
Shekhar	Shashank	173	\$10,080.00
Sheth	Dilip	057	\$6,300.00
Sheth	Minesh	093	\$50,000.00
			\$165,000.00 (see footnote #8 in motion for second distribution)
Shukla	Paresh	060	
Siao	Sein & Serena Choup	153	\$31,500.00

EXHIBIT A: ALLOWED CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF ALLOWED CLAIM
Solanki	Ukabhai	014	\$63,100.00
Soni	Raj	092	\$10,000.00
Sood	Ankush	131	\$10,000.00
Sran	Rena Kaur	141	\$40,000.00
Sran Group LLC		140	\$120,000.00
Stern	Eric	148	\$5,000.00
Stuart	James	165	\$25,000.00
Subramaniam	Nagesh & Arul	119	\$83,975.00
Sundaram	Ravigopal	042	\$35,000.00
Thadani	Rajiv	097	\$10,000.00
Thadani	Ravindra	183	\$6,300.00
The Aditi Patidar Living Trust U/A 06/17/08		022	\$49,683.00
The Prathima Moorthy Irrevocable Trust		035	\$965,921.12
The Singh Family Trust (Birinder & Bhavna Singh, Trustees)		070	\$25,000.00
Tieu	John	109	\$50,000.00
Upadhyaya	Dipakkumar	032	\$50,000.00
Vakil	Ketan	072	\$25,000.00
Valluru	Aparna	171	\$12,500.00
VanStavern	Michael	136	\$25,000.00
Veerachamy & Rajalaksami Ramachandran	Sankar	176	\$10,000.00
Yaramada	Chaitanya & Anireddy, Rajesh	116	\$12,500.00

TOTAL: \$14,186,001.09

EXHIBIT B: DISALLOWED CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	CLAIM NO.	AMOUNT OF DISALLOWED CLAIM
Amin	Chirag	137	\$155,179.19
Amin	Mahendra	139	\$250,000.00
Dubal	Hemal	138	\$141,507.46
Gaw	Edwin	159	\$26,000.00
Gaw	Mailing	160	\$400,000.00
Gaw (FBO Jada Gaw)	Edwin	161	\$102,000.00
Gaw (FBO Katie Gaw)	Edwin	162	\$52,000.00
Jon Brown Enterprises, Inc.		005	\$3,211.11
Movalia	Gignesh	166	\$5,000.00
Movalia	Sona	167	\$5,000.00
Nakkana	Anuja	180	\$2,715.93
OM Investment Management LLC		168	\$375,599.00
Parekh	Dipesh	158	\$25,000.00 (see footnote #10 in motion for second distribution)
Raman	Harish	170	\$12,500.00
Tewari	Ritwik	115	\$2,357.14
Vinvanlak LLC		179	\$5,590.02

TOTAL: \$1,563,659.85

EXHIBIT C: LATE CLAIMS FOR OM GLOBAL INVESTMENT FUND LLC

CLAIMANT'S LAST NAME	CLAIMANT'S FIRST NAME	LATE CLAIM NO.	AMOUNT CLAIMED	RECOMMENDED DISPOSITION	RECOMMENDED AMOUNT OF ALLOWED CLAIM
Kolapalli	Aditya	001	\$10,000.00	This claimant has submitted a claim for \$10,000.00. The Corporate Monitor has no objection to allowing this claim.	Allowed Claim in the claim amount of \$10,000.00.
Qureshi	Muhammad Ahmar	002	\$5,000.00	This claimant has submitted a claim for \$5,000.00. This claimant has failed to attach to the proof of claim form the necessary records, such as a bank statement, to confirm that the transfer of the claimed funds was actually made. However, the Corporate Monitor has independently reviewed the relevant bank records that he obtained through subpoenas to confirm that the transfer of claimed funds was, in fact, actually made. Therefore, the Corporate Monitor has no objection to allowing this claim.	Allowed Claim in the claim amount of \$5,000.00.

TOTAL: \$15,000.00

**JAMES D. SALLAH,
COURT-APPOINTED CORPORATE MONITOR FOR
OM GLOBAL INVESTMENT FUND LLC and OM GLOBAL LP**

ONE BOCA PLACE
2255 GLADES ROAD, SUITE 300E
BOCA RATON, FLORIDA 33431

TEL: (561) 989-9080
FAX: (561) 989-9020

Re: OM Global Investment Fund LLC

**IMPORTANT NOTICE TO CLAIMANTS WHO
HAVE SUBMITTED PROOFS OF CLAIM IN THIS CASE**

Dear Sir/Madam:

If you are receiving this letter, it is because you have submitted a proof of claim form in the OM Global legal proceeding. I am happy to report that I have officially begun the process of making a second distribution.

On February 13, 2015, I filed a Motion with the Court requesting authorization to make a second distribution in the amount of \$1,000,000 to claimants with allowed claims in OM Global Investment Fund LLC. A copy of that Motion has been posted on the OM Global website (www.om-monitor.com), and is attached to this letter. Attached to the Motion (as Exhibits) are various Claim Matrices for claimants of OM Global Investment Fund LLC. On the Claim Matrices, I have identified the “allowed claims” (Exhibit A), “disallowed claims” (Exhibit B), and “late claims” (Exhibit C).

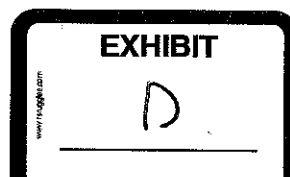
The purpose of this letter is to explain the process to you. If you have any questions, please contact my attorney, Patrick J. Rengstl, at 305.372.3500 ext. 23 or by email at rengstl@payton-law.com. Please note that Mr. Rengstl’s contact information recently changed.

I. If You Have an Allowed Claim

If you have an “allowed claim,” which is listed in Exhibit A, I will be mailing you a second distribution check after the Court grants my Motion authorizing the second distribution. The hearing date is scheduled for Wednesday, March 4, 2015, so I anticipate that I will be in a position to mail second distribution checks a few weeks after that.

II. If You Have a Late Claim

If you have a “late claim,” which is listed in Exhibit C, I will be mailing you a first and a second distribution check after the Court grants my Motion authorizing the second distribution. Again, the hearing date is scheduled for Wednesday, March 4, 2015, so I anticipate that I will be in a position to mail the first and second distribution checks a few weeks after that.

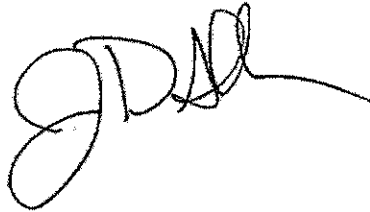


III. If You Have a Disallowed Claim

If you have a “disallowed claim,” which is listed in Exhibit B, I have previously objected to your claim in its entirety and therefore have sought to disallow your claim in its entirety. However, you never responded to me in writing within forty-five (45) calendar days from the date of the prior notice letter – *i.e.*, on or before April 14, 2014 – stating that you disagree with my objection. Because you never timely responded as required by the Court’s prior Order, your claim will be adjudicated according to my objection and, thus, formally disallowed at the upcoming hearing scheduled for Wednesday, March 4, 2015.

Again, if you have any questions regarding any part of the distribution process, please contact my attorney, Patrick J. Rengstl, at 305.372.3500 ext. 23 or rengstl@payton-law.com. Please also continue checking the OM Global website (www.om-monitor.com) for other updates. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'JDS', with a long horizontal flourish extending to the right.

James D. Sallah, Not Individually
But Solely in His Capacity as Corporate Monitor

Encl.

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 13-18620 CA 13

CHIRAG AMIN,

Plaintiff,

vs.

GIGNESH MOVALIA and
OM GLOBAL INVESTMENT FUND LLC,

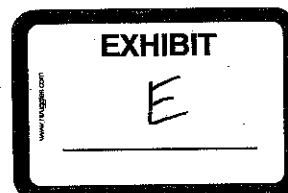
Defendants.

**ORDER GRANTING CORPORATE MONITOR'S MOTION
FOR ENTRY OF ORDER AUTHORIZING SECOND INTERIM
DISTRIBUTION AND ON DISPOSITION OF CLAIMS, INCLUDING LATE CLAIMS**

THIS CAUSE, having come before the Court upon the Corporate Monitor's Motion for Entry of Order Authorizing Second Interim Distribution and on Disposition of Claims, Including Late Claims (the "Motion"), and the Court, having reviewed the relevant pleadings and being otherwise advised in the premises, it is hereby:

ORDERED and ADJUDGED that the Motion is **GRANTED**. The Corporate Monitor is authorized to make a first interim distribution to the late claimants with "allowed claims" in the Late Claims Matrix (Exhibit C to the Motion), in accordance with the procedures approved for the prior first interim distribution to claimants of OM Global Investment Fund LLC with "allowed claims," and in accordance with the claim amounts as described in the Late Claims Matrix (Exhibit C to the Motion). In addition, the Corporate Monitor is authorized to make a second interim distribution in the amount of \$1,000,000.00 in accordance with the procedures described in the

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Motion and approved in the prior Orders on making distributions to claimants of OM Global Investment Fund LLC with “allowed claims,” and in accordance with the claim amounts as described in the Allowed Claims Matrix (Exhibit A to the Motion) and the Late Claims Matrix (Exhibit C to the Motion). Moreover, the Corporate Monitor’s prior objections as to the claims listed in the Disallowed Claims Matrix (Exhibit B to the Motion) are sustained, and the Corporate Monitor’s “Recommended Dispositions” as to these claimants are upheld. Therefore, the claims listed in the Disallowed Claims Matrix (Exhibit B to the Motion) are disallowed in their entirety.

DONE and ORDERED in Chambers at Miami-Dade County, Florida this ___ day of

_____, 2015.

Circuit Court Judge

Copies: Gignesh Movalia (jigmovalia@gmail.com); Gary Klein, Esq. (gkleinlaw@yahoo.com); James D. Sallah, Esq. (jds@sallahcox.com); Jeffrey C. Schneider, Esq. (jcs@klsg.com); Patrick J. Rengstl, Esq. (rengstl@payton-law.com); Chirag Amin (camin12@gmail.com)