UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

)	
In re:)	Chapter 11
)	
TOYS "R" US, INC., et al., 1)	Case No. 17-34665 (KLP)
)	
	Debtors.)	(Jointly Administered)
)	

FUNG RETAILING LIMITED'S STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

Pursuant to Rule 8009(a)(1) of the Federal Rules of Bankruptcy Procedure, Fung Retailing Limited ("Fung Retailing"), appellant in the appeal captioned Fung Retailing Limited v. Toys "R" Us, Inc., et al. and bearing Case No. 3:18-cv-00632-JAG before the United States District Court for the Eastern District of Virginia, hereby states the following issues to be presented on appeal:

1. Whether the bankruptcy court erred in finding or concluding that it has personal jurisdiction over Fung Retailing "with respect to the bidding process" as set forth in the *Order (I)* Establishing Bidding Procedures for the Sale of Certain Assets, (II) Scheduling an Auction and Hearing to Consider the Sale, (III) Approving the Form and Manner of Notice, and (IV) Grating Related Relief [Docket No. 4671].

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 78]. The location of the Debtors' service address is One Geoffrey Way, Wayne, New Jersey 07470.

Dated: September 28, 2018

Respectfully submitted,

/s/ J. Brandon Sieg

James C. Cosby (VSB No. 25992) J. Brandon Sieg (VSB No. 84446)

VANDEVENTER BLACK LLP

Riverfront Plaza – West Tower 901 E. Byrd Street, Suite 1600 Richmond, Virginia 23219

Tel: (804) 237-8820 Fax: (804) 237-8801 jcosby@vanblacklaw.com bsieg@vanblacklaw.com

-and-

Donald S. Bernstein (admitted *pro hac vice*) Benjamin S. Kaminetzky (admitted *pro hac vice*) Timothy Graulich (admitted *pro hac vice*)

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue New York, New York 10017 Tel: (212) 450-4000

Fax: (212) 701-5800 donald.bernstein@davispolk.com benjamin.kaminetzky@davispolk.com timothy.graulich@davispolk.com

Counsel to Fung Retailing Limited

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System on all necessary parties.

/s/ J. Brandon Sieg
J. Brandon Sieg