UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

XIA BI, et al.,

Plaintiffs,

CASE NO. 1-17-cv-01459-CMH-IDD

v.

TERRY MCAULIFFE, et al.,

Defendants.

SUGGESTION OF BANKRUPTCY

PLEASE TAKE NOTICE that on February 26, 2018, GreenTech Automotive, Inc., Gulf Coast Funds Management, LLC, American Immigration Center, LLC, GreenTech Automotive Capital A-3 GP, LLC, and WM Industries Corp. (collectively, the "Debtors") filed voluntary petitions seeking relief under Chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of Virginia, under the following case numbers:

- GreenTech Automotive, Inc. Case number 18-10651;
- Gulf Coast Funds Management, LLC Case number 18-10653;
- American Immigration Center, LLC Case number 18-10654;
- GreenTech Automotive Capital A-3 GP, LLC Case number 18-10655; and
- WM Industries Corp. Case number 18-10652.

Pursuant to Section 362(a) of the Bankruptcy Code, the filing of a bankruptcy matter operates as a stay to the commencement or continuation of any judicial proceeding. This action is founded on claims that should all be stayed given the filing of the Petitions because the claims asserted against the non-debtor defendants herein are interrelated with the claims asserted against the Debtors. This Suggestion of Bankruptcy is for informational purposes only.

Dated: February 27, 2018.

Respectfully submitted,

/s/ Owen J. Shean

Owen J. Shean (VSB No. 21943) John M. Neary (VSB No. 84984)

AKERMAN LLP

750 Ninth Street, N.W., Suite 750

Washington, D.C. 20001 Telephone: (202) 393-6222 Facsimile: (202) 393-5959 owen.shean@akerman.com john.neary@akerman.com

Brian P. Miller (admitted *pro hac vice*) Michael O. Mena (admitted *pro hac vice*) Lorayne Perez (admitted *pro hac vice*)

AKERMAN LLP

Three Brickell City Centre 98 Southeast Seventh Street Miami, Florida 33131 Telephone: (305) 374-5600 Facsimile: (305) 374-5095

Facsimile: (305) 374-5095 brian.miller@akerman.com michael.mena@akerman.com lorayne.perez@akerman.com

Attorneys for Defendants Anthony Rodham, American Immigration Center, LLC, GreenTech Automotive Capital A-3 GP, LLC, GreenTech Automotive, Inc., Gulf Coast Management Funds, LLC and WM Industries Corporation

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of February, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

Jonathan D. Link

GERARD FOX LAW P.C.

3050 K Street, N.W. Washington, DC 20007

Telephone: (202) 664-5585 Facsimile: (310) 441-4447 jlink@gerardfoxlaw.com

Counsel for Plaintiffs

Amanda Callais

PERKINS COIE LLP

700 Thirteenth Street, N.W., Suite 600

Washington, DC 20005 Telephone: (202) 654-6203

Facsimile: (202) 654-9664

acallais@perkinscoie.com

Counsel for Defendant Terence R. McAuliffe

I also certify that a true copy of the foregoing was served via U.S. Mail on this 27th day of February, 2018 upon:

Mr. Xiaolin "Charles" Wang 11301 Kellie Jean Court Great Falls, Virginia 22066 Capital Wealth Holdings, Ltd. c/o Newhaven Trustees (BVI) Limited Third Floor, J&C Building PO Box 933 Road Town, Tortola, British Virgin Islands VG 1110

/s/ Owen J. Shean

Owen J. Shean

AKERMAN LLP

750 Ninth Street, N.W., Suite 750

Washington, D.C. 20001 Telephone: (202) 393-6222 Facsimile: (202) 393-5959

owen.shean@akerman.com