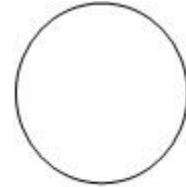




CR-2022-004684



SEAL

	IN THE HIGH COURT OF JUSTICE	
	THE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES	
	INSOLVENCY AND COMPANIES LIST (ChD)	
	Claim No.	No. of 2022

Claimants: Mr James William Cameron Jr; and Ms Charlotte Bertha Elisabeth Philipps being the directors of Petropavlovsk 2010 Limited (“Petro 2010”) respectively authorised to make this application by a resolution of the board of directors of each company dated 9 December 2022 (together the “Applicants”)

IN THE MATTER OF PETROPAVLOVSK 2010 LIMITED

And

IN THE MATTER OF PART 26 OF THE COMPANIES ACT 2006

Defendant(s)

Not applicable

Does your claim include any issues under the Human Rights Act 1998? [No]

Defendant's name and address Not applicable

Details of claim

The Applicants seek the following orders, directions and declarations (as more particularly described in the draft order attached hereto (“the Draft Order”):

- 1 The Applicants be at liberty to convene a single meeting of certain of its creditors for the purposes of considering and, if thought fit, approving a scheme of arrangement between it and such creditors (“**the Scheme Creditors**”) under Part 26 of the Companies Act 2006 (the “**CA 2006**”) (the “**Scheme**”), such meeting to be held on 9 January 2022;
- 2 Upon the Scheme being approved by the requisite majority of the Scheme Creditors, the Court do sanction the Scheme pursuant to section 899(1) of CA 2006 and direct a further hearing before a Judge of the High Court for that purpose.
- 3 The Applicants do file a copy of a report to the court by the chairman of the meeting.
- 4 Such other and further relief as more particularly detailed in the Draft Order and/or as the Court may deem appropriate.

Part 8 of the Civil Procedure Rules 1998 ("CPR") applies to this claim, which is made pursuant to CPR Pt 49 and the Practice Direction which supplements CPR Pt 49.

Statement of Truth

I believe the facts stated in these particulars of claim are true.

I am duly authorised by the claimant to sign this statement

Full name: Ian McKim

Name of Claimant's solicitor's firm: Joseph Hage Aaronson LLP

Signed: 

Position or office held: Partner

Claimant's Solicitor

Ref: OPU1.2

The Applicants' addresses for service is: Joseph Hage Aaronson LLP, 280 High Holborn, London WC1V 7EE.
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The Applicants' email addresses are as follows: MDuncan@jha.com; IMcKim@jha.com; DBarkhordar@jha.com.
