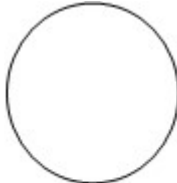


<p style="text-align: center;"><b>IN THE HIGH COURT OF JUSTICE</b></p> <p style="text-align: center;"><b>THE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES</b></p> <p style="text-align: center;"><b>INSOLVENCY AND COMPANIES LIST (ChD)</b></p>	
<p><b>Claim No.</b></p>	<p><b>No. of 2022</b></p>



SEAL

<p><b>Claimants: Mr James William Cameron Jr; and Ms Charlotte Bertha Elisabeth Philipps being the directors of Petropavlovsk 2016 Limited (“Petro 2016”) respectively authorised to make this application by a resolution of the board of directors of each company dated 9 December 2022 (together the “Applicants”)</b></p>	
<p><b>IN THE MATTER OF PETROPAVLOVSK 2016 LIMITED</b></p> <p><b>And</b></p> <p><b>IN THE MATTER OF PART 26 OF THE COMPANIES ACT 2006</b></p>	
<p><b>Defendant(s)</b></p> <p><b>Not applicable</b></p>	
<p><b>Does your claim include any issues under the Human Rights Act 1998? [No]</b></p>	
<p><b>Defendant's name and address Not applicable</b></p>	
<p><b>Details of claim</b></p> <p><b>The Applicants seek the following orders, directions and declarations (as more particularly described in the draft order attached hereto (“the Draft Order”):</b></p> <ol style="list-style-type: none"> <li>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 (“<b>the Scheme Creditors</b>”) under Part 26 of the Companies Act 2006 (the “<b>CA 2006</b>”) (the “<b>Scheme</b>”), such meeting to be held on 9 January 2022;</li> <li>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.</li> <li>3        The Applicants do file a copy of a report to the court by the chairman of the meeting.</li> <li>4        Such other and further relief as more particularly detailed in the Draft Order and/or as the Court may deem appropriate.</li> </ol>	

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.
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**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

<b>Ref:</b> <b>OPU1.2</b>	The Applicants' addresses for service is: Joseph Hage Aaronson LLP, 280 High Holborn, London WC1V 7EE.  The Applicants' email addresses are as follows: MDuncan@jha.com; IMcKim@jha.com; DBarkhordar@jha.com.
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