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IN THE GENERAL DIVISION OF THE HIGH COURT OF THE REPUBLIC OF SINGAPORE

Case No.: HC/OA 384/2022

In the matter of Section 64 of the Insolvency, Restructuring and Dissolution Act 2018
And
In the matter of **ZIPMEX AUSTRALIA PTY LTD**
(ACN No. 632 064 076)

… Applicant

NOTICE OF APPLICATION

Notice is hereby given that **ZIPMEX AUSTRALIA PTY LTD** (ACN No. 632 064 076) ("**Applicant**"), on 22 July 2022, filed an application in the General Division of the High Court of the Republic of Singapore ("**Court**") pursuant to section 64 of the Insolvency, Restructuring and Dissolution Act 2018 (the "**Application**") to seek, inter alia, orders that:

1. For a period of six (6) months from the date of this application or until further order:
   (a) no resolution for the winding up of the Applicant shall be passed;
   (b) no proceedings (other than proceedings under sections 210 and 212 of the Companies Act 1967, and under sections 66, 69 or 70 of the Insolvency, Restructuring and Dissolution Act 2018) shall be commenced or continued against the Applicant, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes;
   (c) no execution, distress or other legal process against any property of the Applicant be commenced, continued, or levied, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes;
   (d) no enforcement of any security over any property of the Applicant, or the repossession of any goods held by the Applicant under any chattels leasing agreement, hire-purchase agreement or retention of title agreement, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes;
   (e) no enforcement of any right of re-entry or forfeiture under any lease in respect of any properties occupied by the Applicant (including any enforcement pursuant to section 18 or 18A of the Conveyancing and Law of Property Act (Cap. 61)), except with the leave of the Court and subject to such terms as the Court imposes;

   (collectively, the "**Moratorium Order**")

2. That the Applicant be entitled to attend and make submissions at the hearing of any application(s) for leave to this Honourable Court to commence, continue, levy or enforce any of the proceedings, or to take any steps restrained by the Moratorium Order;

3. That the Moratorium Order shall apply to any act of any person in Singapore, or within the jurisdiction of this Honourable Court, whether the act takes place in Singapore or elsewhere;

4. The Applicant and any person affected by this order be at liberty to apply for such further or other directions as may be expeditious or necessary; and

5. Such further and other relief, orders and/or directions as this Honourable Court deems fit.

TAKE NOTICE that the address of the Applicant is The Quantum Terminal, Central Terminal Building, 1 Eddy Ave SYDNEY NSW 2000. The Applicant's solicitors are **Messrs Morgan Lewis Stamford LLC** of 10 Collyer Quay, #27-00, Ocean Financial Centre, Singapore 049315.

TAKE FURTHER NOTICE that the Application has been fixed for hearing at **10 am** on **15 August 2022** before the Honourable Justice Aedit Abdullah, sitting in the General Division of the High Court of the Republic of Singapore.

The Singapore Court issued the following directions on 29 July 2022:

1. Any creditor(s) who wish to object to the Applicant's Application, or for any reason wish to respond to the Applicant's affidavit filed in the Application, are to file and serve a reply affidavit by **4 pm** on **5 August 2022**;

2. The Applicant is to file an affidavit in reply by **10 am** on **10 August 2022**;

3. Written submissions, not exceeding 40 pages and 20 pages (respectively) for the Applicant's two sets of joint written submissions and 30 pages for any creditor(s), are to be tendered to the Court by **noon** on **12 August 2022**;

4. The following are to be tendered to the Court by **noon** on **12 August 2022**:
    a. The list of counsel and all representatives of any creditor(s) who wish to attend the substantive hearing of the Application. This list shall indicate the position taken by each attendee;
    b. Letters of authorization for all Legally Unrepresented Persons who wish to attend the hearing of the Application;
    c. A list of all who may be affected by the orders sought in the applications in HC/OAs 381 to 385/2022, with an indication of whether each supports or opposes the applications; and
    d. A time bank setting out the allocation of time for oral submissions by each who wishes to address the Court at the hearing, on the assumption that the entire hearing will take no more than 2 hours.

Soft copies of the full set of cause papers filed by the Applicant in respect of HC/OA 384/2022 will be made available upon request by e-mail to creditors of the Applicant. All queries on the above applications should be directed to MLSProjectZipmex@morganlewis.com.

Note:- Any person who intends to appear at the hearing of the Application must serve on or send by email, fax or hand to the abovementioned Morgan Lewis Stamford LLC a notice in writing of his intention to do so. The notice must state the name and address of the person, or if a firm, the name and address of the firm, and must be signed by the person or firm, or his or their solicitor (if any), and in the case of Legally Unrepresented Persons, must contain copies of the requisite letters of authorization authorizing them to attend the hearing of the Application on the firm's behalf; and must be served in sufficient time to reach the abovenamed not later than noon on 11 August 2022.

Dated this 5th day of August 2022

MORGAN LEWIS STAMFORD LLC
Solicitors for the Applicant