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

HC/OA 49/2025 In the matter of Section 64 of the Insolvency, Restructuring and Dissolution Act (Act 40 of 2018)

And

In the Matter of **LIBERTY HOUSE GROUP PTE. LTD.** (Singapore UEN No. 201113318W)

LIBERTY HOUSE GROUP PTE. LTD.
(Singapore UEN No. 201113318W)

... Applicant

NOTICE OF APPLICATION

NOTICE is hereby given that **LIBERTY HOUSE GROUP PTE. LTD.** (Singapore UEN No. 201113318W) (the "**Applicant**"), on 17 January 2025, 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 four (4) months from the date of this order, or until further order:

   a. no resolution shall be passed for the winding up of the Applicant;

   b. no appointment of a receiver or manager over any property or undertaking of the Applicant shall be made;

   c. no proceedings (other than proceedings under sections 210 or 212 of the Companies Act 1967, or sections 64, 66, 69 or 70 of the Insolvency, Restructuring and Dissolution Act 2018 (the "I**RDA**")) whether before a court, arbitral tribunal or administrative agency, and whether current, pending or threatened against the Applicant, shall be commenced or continued, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes;

   d. no execution, distress or other legal process shall be commenced, continued or levied against any property of the Applicant, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes;

   e. no step to enforce any security over any property of the Applicant, or to repossess any goods held by the Applicant under any chattels leasing agreement, hire-purchase agreement, or retention of title agreement shall be taken, except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes; and

f. no right of re-entry or forfeiture under any lease in respect of any premises occupied by the Applicant shall be enforced (including any enforcement that may be taken pursuant to sections 18 or 18A of the Conveyancing and Law of Property Act 1886), except with the leave of this Honourable Court and subject to such terms as this Honourable Court imposes.

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

(2) 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) 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) Without prejudice to the generality of the above, the Moratorium Order shall apply to acts of ArcelorMittal Holdings AG, whether those acts take place in Singapore or elsewhere, including but not limited to its action, under claim number CL-2023-000080 before the English High Court, seeking to obtain charging orders over the interests of, amongst others, the Company in shares of certain companies incorporated in England and Wales.

(5) Without prejudice to the generality of the above, the Moratorium Order shall apply to acts of ArcelorMittal Luxembourg, whether those acts take place in Singapore or elsewhere.

(6) The Applicant and any person affected by the Moratorium Order be at liberty to apply for such further orders, reliefs and other directions as may be expeditious or necessary.

(7) Such further and other relief, orders and/or directions as the Court deems fit.

TAKE NOTICE that the address of the Applicant is 10 Marina Boulevard, #08-01, Marina Bay Financial Centre, Singapore 018983. The Applicant's solicitors are **Providence Law Asia LLC** of One Raffles Place, Tower 2, #29-62, Singapore 048616.

TAKE FURTHER NOTICE that the Application has been fixed for a hearing at 10am, Monday, 10 February 2025 (the "**Hearing**") before the Honourable Justice Hri Kumar Nair.

Soft copies of the full set of cause papers filed by the Applicant in respect of the Application will be made available upon request by e-mail. All queries on the above Application should be directed to <projectliberty@providencelawasia.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 Providence Law Asia LLC a notice in writing of his or her intention to do so. The notice must state the name and address of the person, or if a firm, the name address of the firm, and must be signed by the person or firm, or his or her solicitor (if any), and in the case of Legally Unrepresented Persons, must contain copies of the requisite letters of authorisation authorising them to attend the Hearing of the Application on the firm's behalf; and must be served in sufficient time to reach the above named not later than noon on Thursday, 6 February 2025.

Dated this 3rd day of February 2025.

PROVIDENCE LAW ASIA LLC
Solicitors for the Applicant