

INSERT SHEET

Page No. 1

Thursday 8th
October 2020
matter mentioned
CMB Jallah SA formal of AO Kansas for
the PFF applicant.

Before the Hon Justice
Mr. Omba/Komara's

- Exhibit JAF 1 - defendant's Corporate Certificate
- Exhibit JAF 2 - writ of summons issued in Kono
- Exhibit JAF 3 - defendant's notice of appearance to the writ issued in Kono
- Exhibit JAF 4 - Def's notice of motion to strike out the said writ of summons issued in Kono
- Exhibit JAF 5 - PFF's affidavit in opposition to strike out the writ of summons issued in Kono
- Exhibit JAF 6 - Ex parte notice of motion dated 17/8/20 supported by affidavit dated the same date
- Exhibit JAF 7 - Judgment & order granting judgment in favour of the defendant's measure to strike out the writ of summons
- Exhibit JAF 8 - Certificate of the Committee of the PFF
- Exhibit JAF 9 - The PFF's affidavit in support of the writ of summons

was filed against the defendants pre application objection on the freezing order

Exhibit JAF 11 - Judgment dated 9-30-20 striking out JAF 2 supra and the ruling

Exhibit JAF 12 - Copy of the writ of Summons dated 5-10-20 of the writ of service

Exhibit JAF 14 & 15 - True copies of an order of the High Court freezing order against defendant in an amount of \$1.85 billion

Exhibit JAF 16 - Copy of the 1st, 3rd, 5th, 7th, 9th & 11th defendants resolution demonstrating that BSGR and the 1st, 3rd & 9th defts act as a single unit and co-mingle their assets.

Exhibit JAF 17, 18, 19 & 20 & 21 - are docs demonstrating that BSGR, the parent company of the 1st, 3rd, 5th, 7th, 9th & 11th defendants have a history and pattern of committing fraud to ensure that the assets of their companies and subsidiaries are put away beyond the reach of courts & creditors.

Exhibit JAF 22 - News article quoting one of the directors of BSGR describing the strategies they adopt to avoid liabilities to pay \$1.25 billion arbitration award in favour of VALE

Exhibit JAF 23 - Arbitration award order describes the evasion patterns adopted by the defts parent company BSGR

at para 426 483-87 emphasis
that the defts and BSGR have the propen-
sity to adopt same strategies and con-
ducts to hide assets in SD and put
them beyond the reach of the Court if
not preferred

Exhibit JAF 24 & 25 - Docs. from the
General Bankruptcy Court and the US
Bankruptcy Court for the Southern NY
demonstrating how each of us for BSGR
to move assets and how their corporate
structure charts demonstrates that the
subsidiary company and parent company
are one and the same

Exhibit JAF 26 - Docs. filed at the
U.S. Bankruptcy Court for Southern
District of New York disclosing how pro-
ceeds received from VALE was siphoned
away and shared amongst subsidiary
and parent companies

Exhibit JAF 27 - witness state-
ment filed in the English High Court
for summary judgment application in
a fraud action against BSGR for the
amount of \$ 37,000,000.

Exhibit JAF 28 - a letter from Barry
Steinmetz filed as exhibit in the
Southern District of NY

Exhibit JAF 29 - ~~was~~ an article
indicating that Barry Steinmetz commi-
ted to fund \$ 100 million to a secret
company called SCORPIO

Exhibit JAF 30 - Doc. filed at the Southern District of NY particularly at page 9-11, indicating how BSGR has committed to use the OCEA subsidiary Company's assets for security for the loan of \$161 million from Standard Chartered Bank.

Exhibit JAF 31 - Report from BSGR Joint Administrator dated 5/3/20, providing an update how BSGR plans to satisfy OCEA Group of Companies' assets to satisfy its obligations filed in the U.S. District Court of Southern NY.

Exhibit JAF 32 - Settlement arrangement of BSGR in respect of a New Company it sets up in Guinea to take over the mines in Guinea where BSGR & Berry Steinmetz are able to hide behind & benefit from the mines hitherto lost due to their fraudulent conduct. J2

Exhibit JAF 33 - African mining in Nigeria Article

Exhibit JAF 34 - Bermuda Register of Companies records.

Exhibit JAF 35 - is the application for variation of charge documents.

Exhibit JAF 36 - Declaration of Michael Cohen

Exhibit JAF 37 - BSGR Joint Administrator report

Exhibit JAF 38 - Bank disclosure account for OCEA Group dated 1/2/15

Exhibit JAF 39 - Standard Chartered Bank Security Interest over all proceeds flow to the Company. Pg 11 referred Exhibit JAF 40-41 - Thompson Reuters Laws relating to enforcement of foreign judgment in the British Islands and Guernsey by International Corporate Legal guides

~~Exhibit~~ pursuant to O 35 of the High Court Rules R 192 and O 44 R 1(1) of 2007: Section 4 of the Debtors Act CAP 24 of the Laws of Sierra Leone. O 54 R 1(1) & (2) of the High Court Rules 2007

Having read the ^{Ruling} ex parte Notice of Motion dated 8-10-20 and the supporting affidavit sworn to by JA - former Esq on the same date with exhibits attached.

AND upon hearing CMB Jalloh Esq. of Counsel for the Plaintiff/Applicant. It is hereby ordered as follows:

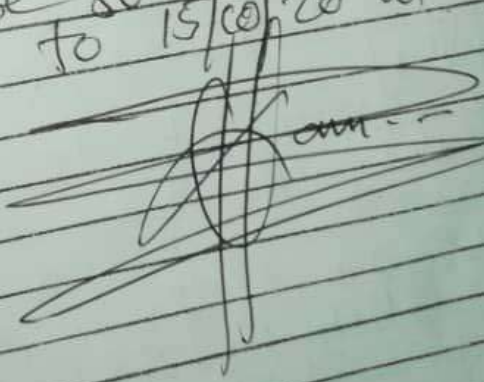
1. This Court grants an interim injunction restraining the Defendants/Respondents herein whether by themselves, their servants, proxies, relatives, heirs, administrators, employees and/or agents from dealing or transacting or transferring interfering with, controlling, selling, receiving, loaning, pledging, expropriating or in any other manner from disposing of the assets of the defendant herein, within and around

1st 2nd 3rd 4th 5th 6th 7th 8th 9th 10th 11th & 12th

INSERT SHEET

The Mining Concession Area of the Republic of Sierra Leone and worldwide is pending the hearing and determination of this application.

- 2 No order as to cost.
- 3 Order to be served with motion on defendants adjourned to 15/10/20 at 9:30 AM

 8/10/20