

From: Zoller, Julian 66973 <julian.zoller@ashurst.com>

Sent: Friday, 1 July 2022 4:20 PM

To: law@panetta.com.au; rebekah@companygiles.com.au; Alana Galasso <Alana.Galasso@minterellison.com>; Alexandra Lawrence <Alexandra.Lawrence@madgwicks.com.au>; Caitlin Murray <Caitlin.Murray@minterellison.com>; Andrew Clarke <Andrew.Clarke@minterellison.com>; kirsty.prinsloo@allens.com.au; Melissa Passarelli <Melissa.Passarelli@madgwicks.com.au>; Michael Hughes <Michael.Hughes@minterellison.com>; forumallens@allens.com.au; rdobson@jonesday.com; myiasemides@jonesday.com; thaystead@jonesday.com; Kate Cockburn <Kate.Cockburn@minterellison.com>; lshanahan@jonesday.com; chris.prestwich@allens.com.au; Sazz Nasimi <Sazz.Nasimi@madgwicks.com.au>; Candy Nelson <Candy.Nelson@madgwicks.com.au>; robert.ishak@williamroberts.com.au; Simon Brandis <Simon.Brandis@minterellison.com>; billp@whparsons.com.au; hayley@whparsons.com.au; sathya@whparsons.com.au; skarnib@mlglaw.com.au; melazzi@mlglaw.com.au; raymond.makko@williamroberts.com.au; Claire Latham <Claire.Latham@minterellison.com>; rdobson@jonesday.com; Anthony Sommer <Anthony.Sommer@minterellison.com>; Michael Swain <Michael.Swain@minterellison.com>; EXT-ForumGroupJD@groups.jonesday.com
Cc: Bolster, Ian 66697 <Ian.Bolster@ashurst.com>; Brett, Carla-Rose 65799 <carla-rose.brett@ashurst.com>
Subject: Societe Generale v Forum Finance & Ors (NSD642/2021) [ASH-AUS.FID30448260]

Dear Colleagues

We act for Societe Generale, the applicant in Federal Court of Australia proceeding NSD642/2021.

We are sending this email to:

- in respect of the first and third respondent (ie Forum Finance and FGFS), Allens as their solicitors;
- in respect the second respondent, Panetta Lawyers and Rebekah Giles of Company (Giles) in accordance with the orders made on 10 March 2022 (as amended by the orders made on 30 May 2022). We will also send an sms to the "Greek Phone Number" for Mr Papas, as required by those orders; and
- the representatives for the parties in the Westpac and SMBC proceedings (for their information and having regard to order 8 made on 30 July 2021, although we note that the court book to be prepared for the Societe Generale proceedings is separate to the court book to be prepared in the other proceedings: order 2 of 8 April 2022).

We **enclose** by way of service:

1. Sealed Concise Statement filed on 1 July 2021;
2. Sealed Applicant's Genuine Steps Statement filed on 1 July 2021;
3. Sealed Amended Originating Application filed on 2 August 2021;
4. Sealed Statement of Claim filed on 2 August 2021;
5. Affidavit of Gregory Thong sworn 30 June 2011 (**First Thong Affidavit**);
6. Exhibits GT-1 to GT-38 to the First Thong Affidavit;
7. Affidavit of Gurpreet Brar sworn 1 July 2021 (**Brar Affidavit**);
8. Exhibits GB-1 to GB-7 to the Brar Affidavit;
9. Affidavit of Gregory Thong sworn 14 December 2021 (**Second Thong Affidavit**);

10. Exhibits GT-39 to GT-45 to the Second Thong Affidavit;
11. Affidavit of Nicolas Dumont sworn 8 February 2022 (**Dumont Affidavit**);
12. Exhibits ND-1 to ND-3 to the Dumont Affidavit;
13. Bundle of bank statements – Forum Finance;
14. Bundle of bank statements – Forum Group Financial Services;
15. ASIC Current and Historical Extract - Forum Finance dated 29 June 2022;
16. ASIC Current and Historical Extract – Forum Group Financial Services dated 29 June 2022;
17. Affidavit of Jason Preston affirmed 7 February 2022 (**First Preston Affidavit**);
18. Exhibits JP-1 to JP-10 to the First Preston Affidavit;
19. Affidavit of Jason Preston affirmed 10 June 2022 (**Second Preston Affidavit**);
20. Exhibits JP-11 to JP-18 to the Second Preston Affidavit; and
21. Draft court book index in respect of the Societe Generale proceedings.

The documents at 1 to 21 above can be downloaded at this link: <https://ashurst.sharefile.com/d-sa7df7e89ea754667b1fd3ebc0cc941b3>

The court book index at 21 above serves as an index of all documents that Societe Generale proposes to tender at the hearing for the purposes of order 11 made on 10 March 2022. That said, it is sent in draft and our client reserves the right to add any documents to, or remove documents from, the final court book. If it does so, we will let you know. We look forward to any index of additional documents that any other party to the Societe Generale proceedings proposes to tender at hearing, in accordance with order 12 made on 10 March 2022.

Kind regards

Julian Zoller

Lawyer

julian.zoller@ashurst.com

Ashurst

D: +61 2 9258 6973 | M: +61 481 098 034

Ashurst Australia, 5 Martin Place, Sydney, NSW 2000, Australia

T: +61 2 9258 6000 | F: +61 2 9258 6999

www.ashurst.com | [Global coverage](#)

ASHURST IS PROUDLY CELEBRATING **200 YEARS.**

VISIT OUR WEBSITE TO FIND OUT MORE.



Together, we create the extraordinary