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Registrar

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Form 34
Rule 16.33

Reply to the BCC/TM Parties' and IAL's Annexure A

No. NSD1039/2021

Federal Court of Australia

District Registry: New South Wales

Division: Commercial and Corporations National Practice Area (Insurance List)

White Oak Commercial Finance Europe (Non-Levered) Limited

Applicant

Insurance Australia Limited ACN 000 016 722 and others named in the Schedule

First respondent

In reply to the BCC/TM Parties' ~~TMNF/TMMA~~ Annexure A filed on 29 ~~April~~ July 2026 (**BCC/TM Annexure A**) and the IAL Annexure A filed on 30 April 2026 (**IAL Annexure A**), and adopting the capitalised terms contained in the Fifth Amended Statement of Claim filed by the applicant on 5 December 2025 (**WO 5ASOC**), and using the headings contained in the BCC/TM Annexure A without admission and for convenience only:

1 GREENSILL GROUP AND MARSH

1. White Oak admits paragraph 1 of the BCC/TM Annexure A.

2. In reply to paragraph 2 of the BCC/TM Annexure A, White Oak:

   (a) repeats Part G of the WO 5ASOC and otherwise does not admit subparagraph (a);

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(b) refers to and repeats paragraph 23 of the WO 5ASOC and otherwise does not admit subparagraph (b); and

(c) otherwise does not know and therefore cannot admit subparagraph (c).

2 THE 90/10 MASTER POLICIES AND PARALLEL POLICIES AND THE BINDING OF RISKS UNDER THEM

3. In reply to paragraph 3 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 37G to 37O of the WO 5ASOC;

(b) says:

(i) GCPL and GCUK were the "Insured" under the 2017 Master Policy 3691;

(ii) GCPL and GBAG were the "Insured" under the 2017 Parallel Policy 3690;

(c) relies on the 2017 Standalone Policies for their full force and effect; and

(d) otherwise admits the paragraph.

4. In reply to paragraph 4 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 38 to 41 of the WO 5ASOC;

(b) says:

(i) GCPL and GCUK were the "Insured" under the Master Policy;

(ii) GCPL and GBAG were the "Insured" under the Policy;

(c) relies on the 2017 Standalone Policies for their full force and effect; and

(d) otherwise admits the paragraph.

5. In reply to paragraph 5 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 37G and 37I of the WO 5ASOC;

(b) relies on the terms of the 2017 Standalone Policies for their full force and effect; and

(c) otherwise denies the paragraph.

6. In reply to paragraph 6 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 37G, 37I, 38, 38A, 39 and 40 of the WO 5ASOC; and

(b) relies on the terms of the 2017 Standalone Policies and the Policy for their full force and effect; and

(c) otherwise denies the paragraph.

7. White Oak does not know and therefore cannot admit paragraph 7 of the BCC/TM Annexure A.

8. In reply to paragraph 8 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 3 to 6 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

3 LEX GREENSILL

9. In reply to paragraph 9 of the BCC/TM Annexure A, White Oak:

(a) says the records maintained by:

(i) the Australian Securities and Investments Commission (**ASIC**) record that Lex Greensill was since 4 November 2011, and is, a director of GCPL;

(ii) Companies House record that Lex Greensill was a director of GCUK from 2 July 2012 to 17 June 2026; and

(b) otherwise does not know and therefore cannot admit the paragraph.

10. In reply to paragraph 10 of the BCC/TM Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 7 above, and refers to paragraphs 27 and 28 below; and

(b) does not know and therefore cannot admit the paragraph.

11. In reply to paragraph 10A.1 of the BCC/TM Annexure A and paragraph 1 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37G, 38, 41, 41A, 46, 47, 52, 54 and 57 of the WO 5ASOC (**WO Policies and Endorsements**), and refers to Section G below; and

(b) otherwise does not know and therefore cannot admit the paragraph.

12. In reply to paragraph 10A.2 of the BCC/TM Annexure A and paragraph 2 of the IAL Annexure A, White Oak:

(a) repeats Part G of the WO 5ASOC;

(b) admits the WO Policies and Endorsements were and are governed by and construed in accordance with the laws of New South Wales (Australia);

(c) admits the *Insurance Contracts Act 1984* (Cth) (**ICA**) applied to the WO Policies and Endorsements; and

(d) otherwise does not know and therefore cannot admit the paragraph.

13. In reply to paragraph 10A.3 of the BCC/TM Annexure A and paragraph 3 of the IAL Annexure A, White Oak:

(a) repeats paragraph 12 above;

(b) says any general duties were subject to and/or are to be applied and/or construed by reference to the ICA and/or the terms of the WO Policies and Endorsements; and

(c) otherwise does not know and therefore cannot admit the paragraph.

B ATTRIBUTION

Structure of the Greensill Group

14. In reply to paragraph 10A.4 of the BCC/TM Annexure A and paragraph 4 of the IAL Annexure A, White Oak:

(a) says the records maintained by Companies House record that:

(i) GCPL was the sole shareholder of GCUK between July 2013 and 2020;

(ii) GCUK was a majority shareholder of GBAG from February 2014 until December 2018; and

(b) otherwise does not know and therefore cannot admit the paragraph.

15. In reply to paragraph 10A.5 of the BCC/TM Annexure A and paragraph 5 of the IAL Annexure A, White Oak:

(a) repeats paragraph 14 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

16. In reply to paragraph 10A.6 of the BCC/TM Annexure A and paragraph 6 of the IAL Annexure A, White Oak:

(a) repeats paragraph 14 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

SCF Business

17. In reply to paragraph 10A.7 of the BCC/TM Annexure A and paragraph 7 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

18. White Oak does not know and therefore cannot admit paragraph 10A.8 of the BCC/TM Annexure A and paragraph 8 of the IAL Annexure A.

Roles and responsibilities of key personnel

19. In reply to paragraph 10A.9 of the BCC/TM Annexure A and paragraph 9 of the IAL Annexure A, White Oak:

(a) repeats paragraph 9 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

20. In reply to paragraph 10A.10 of the BCC/TM Annexure A and paragraph 10 of the IAL Annexure A, White Oak:

(a) repeats paragraph 19 above;

(b) says the records maintained by:

(i) ASIC record that:

(A) between 22 January 2018 and 5 March 2021, Maurice Thompson was a director of GCPL; and

(B) between 6 November 2014 and 11 February 2021, William Roland Hartley-Urquhart was a director of GCPL; and

(ii) Companies House record that:

(A) between 25 September 2014 and 22 January 2018, Maurice Thompson was a director of GCUK; and

(B) between 20 May 2015 and 22 January 2018, William Roland Hartley-Urquhart was a director of GCUK; and

(c) otherwise does not know and therefore cannot admit the paragraph.

21. White Oak does not know and therefore cannot admit paragraph 10A.11 of the BCC/TM Annexure A and paragraph 11 of the IAL Annexure A.

22. White Oak does not know and therefore cannot admit paragraph 10A.12 of the BCC/TM Annexure A and paragraph 12 of the IAL Annexure A.

Placement of the Relevant Policies and Endorsements

23. White Oak does not know and therefore cannot admit paragraph 10A.13 of the BCC/TM Annexure A and paragraph 13 of the IAL Annexure A.

24. In reply to paragraph 10A.14 of the BCC/TM Annexure A and paragraph 14 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 2 to 4 above; and;

(b) otherwise does not know and therefore cannot admit the paragraph.

25. White Oak does not know and therefore cannot admit paragraph 10A.15 of the BCC/TM Annexure A and paragraph 15 of the IAL Annexure A.

26. In reply to paragraph 10A.16 of the BCC/TM Annexure A and paragraph 16 of the IAL Annexure A, White Oak:

(a) repeats paragraph 17 above;

(b) relies on the terms of the “2016 SLA” and the “2020 SLA” for their full force and effect; and

(c) does not know and therefore cannot admit the paragraph.

27. In reply to paragraph 10A.17 of the BCC/TM Annexure A and paragraph 17 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 25 above;

(b) says that pursuant to clause 7.5 of each of the 2017 Parallel Policy 3690 and the Policy, GCUK (as the "Servicer") was not the agent of GCPL or GBAG (as the "Insured") respect of the policy; and

(c) does not know and therefore cannot admit the paragraph.

28. In reply to paragraph 10A.18 of the BCC/TM Annexure A and paragraph 18 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4, 25 and 26 above;

(b) says that pursuant to clause 7.5 of each of the 2017 Parallel Policy 3690 and the Policy, GCUK (as the "Servicer") was not the agent of GCPL or GBAG (as the "Insured") respect of the policy; and

(c) does not know and therefore cannot admit the paragraph.

Attribution of conduct and knowledge to GCPL

29. In reply to paragraph 10A.19 of the BCC/TM Annexure A and paragraph 19 of the IAL Annexure A, White Oak:

(a) refers to Section D below;

(b) repeats paragraphs 3 and 4 above; and

(c) otherwise does not know and therefore cannot admit the paragraph.

30. In reply to paragraph 10A.20 of the BCC/TM Annexure A and paragraph 20 of the IAL Annexure A, White Oak:

(a) refers to Section D below; and

(b) otherwise does not know and therefore cannot admit the paragraph.

31. In reply to paragraph 10A.21 of the BCC/TM Annexure A and paragraph 21 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 20(b)(i)(B);

(b) repeats paragraphs 3 and 4 above; and

(c) otherwise does not know and therefore cannot admit the paragraph.

32. In reply to paragraph 10A.22A of the BCC/TM Annexure A and paragraph 22 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 27 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

33. In reply to paragraph 10A.22B of the BCC/TM Annexure A and paragraph 23 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 27 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Attribution of conduct and knowledge to Greensill Bank

34. In reply to paragraph 10A.23 of the BCC/TM Annexure A and paragraph 24 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3 and 4 above;

(b) refers to Section D below; and

(c) otherwise does not know and therefore cannot admit the paragraph.

35. In reply to paragraph 10A.24 of the BCC/TM Annexure A and paragraph 25 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 9, 18 and 19 above; and

(b) does not know and therefore cannot admit the paragraph.

36. In reply to paragraph 10A.25 of the BCC/TM Annexure A and paragraph 26 of the IAL Annexure A, White Oak:

(a) repeats paragraph 3, 4 and 35 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

37. In reply to paragraph 10A.25A of the BCC/TM Annexure A and paragraph 27 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3 and 4 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

38. White Oak does not know and therefore cannot admit paragraph 10A.25B of the BCC/TM Annexure A and paragraph 28 of the IAL Annexure A.

39. In reply to paragraph 10A.26A of the BCC/TM Annexure A and paragraph 29 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 28 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

40. In reply to paragraph 10A.26B of the BCC/TM Annexure A and paragraph 30 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 3, 4 and 28 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

C BACKGROUND REPRESENTATIONS & NON-DISCLOSURES BY GREENSILL

C1 SCF Representation

41. In reply to paragraph 10A.27 of the BCC/TM Annexure A and paragraph 31 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

42. In reply to paragraph 10A.28 of the BCC/TM Annexure A and paragraph 32 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

43. In reply to paragraph 10A.29 of the BCC/TM Annexure A and paragraph 33 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37G, 38, 41, 41A, 46, 47, 52, 54 and 57 of the WO 5ASOC; and

(b) otherwise does not know and therefore cannot admit the paragraph.

C2 Future Account Receivable Representation

44. In reply to paragraph 10A.30 of the BCC/TM Annexure A and paragraph 34 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised document and relies on that document for its full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

45. In reply to paragraph 10A.31 of the BCC/TM Annexure A and paragraph 35 of the IAL Annexure A, White Oak:

(a) repeats paragraph 44 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

46. In reply to paragraph 10A.32 of the BCC/TM Annexure A and paragraph 36 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 44 and 45 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

47. In reply to paragraph 10A.33 of the BCC/TM Annexure A and paragraph 37 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37G, 38, 41, 41A, 46, 47, 52, 54 and 57 of the WO 5ASOC; and

(b) otherwise does not know and therefore cannot admit the paragraph.

C2A GFG and GAM

48. White Oak does not know and therefore cannot admit paragraph 10A.33A of the BCC/TM Annexure A and paragraph 38 of the IAL Annexure A.

49. In reply to paragraph 10A.33B of the BCC/TM Annexure A and paragraph 39 of the IAL Annexure A, White Oak:

(a) repeats paragraph 48, and paragraphs 18, 21 and 22 of the WO 5ASOC; and

(b) otherwise does not know and therefore cannot admit the paragraph.

50. White Oak does not know and therefore cannot admit paragraph 10A.33C of the BCC/TM Annexure A and paragraph 40 of the IAL Annexure A.

51. White Oak does not know and therefore cannot admit paragraph 10A.33D of the BCC/TM Annexure A and paragraph 41 of the IAL Annexure A.

52. White Oak does not know and therefore cannot admit paragraph 10A.33E of the BCC/TM Annexure A and paragraph 42 of the IAL Annexure A.

C2B GFG Liquidity Issues and rolling

53. White Oak does not know and therefore cannot admit paragraph 10A.33F of the BCC/TM Annexure A and paragraph 43 of the IAL Annexure A.

54. White Oak does not know and therefore cannot admit paragraph 10A.33G of the BCC/TM Annexure A and paragraph 44 of the IAL Annexure A.

55. White Oak does not know and therefore cannot admit paragraph 10A.33H of the BCC/TM Annexure A and paragraph 45 of the IAL Annexure A.

56. White Oak does not know and therefore cannot admit paragraph 10A.33I of the BCC/TM Annexure A and paragraph 46 of the IAL Annexure A.

57. White Oak does not know and therefore cannot admit paragraph 10A.33J of the BCC/TM Annexure A and paragraph 47 of the IAL Annexure A.

58. White Oak does not know and therefore cannot admit paragraph 10A.33K of the BCC/TM Annexure A and paragraph 48 of the IAL Annexure A.

59. White Oak denies paragraph 10A.33L of the BCC/TM Annexure A and paragraph 49 of the IAL Annexure A.

60. White Oak does not know and therefore cannot admit paragraph 10A.33M of the BCC/TM Annexure A and paragraph 50 of the IAL Annexure A.

61. White Oak denies paragraph 10A.33N of the BCC/TM Annexure A and paragraph 51 of the IAL Annexure A.

62. White Oak does not know and therefore cannot admit paragraph 10A.33O of the BCC/TM Annexure A and paragraph 52 of the IAL Annexure A.

63. White Oak does not know and therefore cannot admit paragraph 10A.33P of the BCC/TM Annexure A and paragraph 53 of the IAL Annexure A.

64. White Oak does not know and therefore cannot admit paragraph 10A.33Q of the BCC/TM Annexure A and paragraph 54 of the IAL Annexure A.

C3 Liberty Group Fraud Non-Disclosure

The Credit Suisse Concerns

65. In reply to paragraph 10A.34 of the BCC/TM Annexure A and paragraph 55 of the IAL Annexure A, White Oak:

    (a) admits the existence of the particularised document; and

    (b) otherwise does not know and therefore cannot admit the paragraph.

66. White Oak does not know and therefore cannot admit paragraph 10A.35 of the BCC/TM Annexure A and paragraph 56 of the IAL Annexure A.

67. In reply to paragraph 10A.36 of the BCC/TM Annexure A and paragraph 57 of the IAL Annexure A, White Oak:

    (a) admits the existence of the particularised document; and

    (b) otherwise does not know and therefore cannot admit the paragraph.

68. In reply to paragraph 10A.37 of the BCC/TM Annexure A and paragraph 58 of the IAL Annexure A, White Oak:

    (a) repeats paragraph 67 above; and

    (b) does not know and therefore cannot admit the paragraph.

The Diligence Paper Findings

69. In reply to paragraph 10A.38 of the BCC/TM Annexure A and paragraph 59 of the IAL Annexure A, White Oak:

    (a) admits the existence of the particularised documents; and

    (b) otherwise does not know and therefore cannot admit the paragraph.

70. In reply to paragraph 10A.39 of the BCC/TM Annexure A and paragraph 60 of the IAL Annexure A, White Oak:

    (a) repeats paragraph 69 above; and

    (b) otherwise does not know and therefore cannot admit the paragraph.

71. White Oak does not know and therefore cannot admit paragraph 10A.40 of the BCC/TM Annexure A and paragraph 61 of the IAL Annexure A.

The Liberty Group Fraud Non-Disclosure

72. White Oak does not know and therefore cannot admit paragraph 10A.41 of the BCC/TM Annexure A and paragraph 62 of the IAL Annexure A.

73. White Oak does not know and therefore cannot admit paragraph 10A.42 of the BCC/TM Annexure A and paragraph 63 of the IAL Annexure A.

74. White Oak does not know and therefore cannot admit paragraph 10A.43 of the BCC/TM Annexure A and paragraph 64 of the IAL Annexure A.

75. White Oak does not know and therefore cannot admit paragraph 10A.44 of the BCC/TM Annexure A and paragraph 65 of the IAL Annexure A.

76. White Oak does not know and therefore cannot admit paragraph 10A.45 of the BCC/TM Annexure A and paragraph 66 of the IAL Annexure A.

77. White Oak does not know and therefore cannot admit paragraph 10A.46 of the BCC/TM Annexure A and paragraph 67 of the IAL Annexure A.

78. White Oak does not know and therefore cannot admit paragraph 10A.47 of the BCC/TM Annexure A and paragraph 68 of the IAL Annexure A.

D SPECIFIC MISREPRESENTATIONS AND NON-DISCLOSURES

D1 Liberty TCUK

D1.1 Policy and Endorsements

79. In reply to paragraph 10A.48 of the BCC/TM Annexure A and paragraph 69 of the IAL Annexure A, White Oak:

    (a) refers to paragraph 132 of the Sixth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD169/2023 (**CS 6ASOC**) for its full force and effect;

    (b) says it does not make any allegation as pleaded; and

    (c) otherwise does not know and therefore cannot admit the paragraph.

D1.1A Liberty TCUK Misrepresentations

80. White Oak does not know and therefore cannot admit paragraph 10A.48A of the BCC/TM Annexure A and paragraph 70 of the IAL Annexure A.

81. White Oak does not know and therefore cannot admit paragraph 10A.48B of the BCC/TM Annexure A and paragraph 71 of the IAL Annexure A.

82. White Oak does not know and therefore cannot admit paragraph 10A.48C of the BCC/TM Annexure A and paragraph 72 of the IAL Annexure A.

83. In reply to paragraph 10A.48D of the BCC/TM Annexure A and paragraph 73 of the IAL Annexure A, White Oak:

    (a) repeats paragraphs 80 and 82 above; and

    (b) does not know and therefore cannot admit the paragraph.

84. White Oak does not know and therefore cannot admit paragraph 10A.48E of the BCC/TM Annexure A and paragraph 74 of the IAL Annexure A.

85. White Oak does not know and therefore cannot admit paragraph 10A.48F of the BCC/TM Annexure A and paragraph 75 of the IAL Annexure A.

86. White Oak does not know and therefore cannot admit paragraph 10A.48G of the BCC/TM Annexure A and paragraph 76 of the IAL Annexure A.

87. White Oak does not know and therefore cannot admit paragraph 10A.48H of the BCC/TM Annexure A and paragraph 77 of the IAL Annexure A.

88. White Oak does not know and therefore cannot admit paragraph 10A.48I of the BCC/TM Annexure A and paragraph 78 of the IAL Annexure A.

89. White Oak does not know and therefore cannot admit paragraph 10A.48J of the BCC/TM Annexure A and paragraph 79 of the IAL Annexure A.

90. White Oak does not know and therefore cannot admit paragraph 10A.48K of the BCC/TM Annexure A and paragraph 80 of the IAL Annexure A.

91. White Oak does not know and therefore cannot admit paragraph 10A.48L of the BCC/TM Annexure A and paragraph 81 of the IAL Annexure A.

92. White Oak does not know and therefore cannot admit paragraph 10A.48M of the BCC/TM Annexure A and paragraph 82 of the IAL Annexure A.

93. White Oak does not know and therefore cannot admit paragraph 10A.48N of the BCC/TM Annexure A and paragraph 83 of the IAL Annexure A.

94. White Oak does not know and therefore cannot admit paragraph 10A.48O of the BCC/TM Annexure A and paragraph 84 of the IAL Annexure A.

95. White Oak does not know and therefore cannot admit paragraph 10A.48P of the BCC/TM Annexure A and paragraph 85 of the IAL Annexure A.

96. White Oak does not know and therefore cannot admit paragraph 10A.48Q of the BCC/TM Annexure A and paragraph 86 of the IAL Annexure A.

97. White Oak does not know and therefore cannot admit paragraph 10A.48R of the BCC/TM Annexure A and paragraph 87 of the IAL Annexure A.

98. White Oak does not know and therefore cannot admit paragraph 10A.48S of the BCC/TM Annexure A and paragraph 88 of the IAL Annexure A.

99. White Oak does not know and therefore cannot admit paragraph 10A.48T of the BCC/TM Annexure A and paragraph 89 of the IAL Annexure A.

Liberty TCUK Future AR Facility Misrepresentation

100. In reply to paragraph 10A.48U of the BCC/TM Annexure A and paragraph 90 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 98 and 99 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

101. In reply to paragraph 10A.48V of the BCC/TM Annexure A and paragraph 91 of the IAL Annexure A, White Oak:

(a) repeats section C2 and paragraphs 98 and 99 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

102. White Oak does not know and therefore cannot admit paragraph 10A.48W of the BCC/TM Annexure A and paragraph 92 of the IAL Annexure A.

Representations were misleading

103. White Oak does not know and therefore cannot admit paragraph 10A.48X of the BCC/TM Annexure A and paragraph 93 of the IAL Annexure A.

Knowledge of falsity of representations

104. White Oak does not know and therefore cannot admit paragraph 10A.48Y of the BCC/TM Annexure A and paragraph 94 of the IAL Annexure A.

105. In reply to paragraph 10A.48Z of the BCC/TM Annexure A and paragraph 95 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

106. In reply to paragraph 10A.48AA of the BCC/TM Annexure A and paragraph 96 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

107. White Oak does not know and therefore cannot admit paragraph 10A.48BB of the BCC/TM Annexure A and paragraph 97 of the IAL Annexure A.

108. In reply to paragraph 10A.48CC of the BCC/TM Annexure A and paragraph 98 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

109. In reply to paragraph 10A.48DD of the BCC/TM Annexure A and paragraph 99 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

110. White Oak does not know and therefore cannot admit paragraph 10A.48EE of the BCC/TM Annexure A and paragraph 100 of the IAL Annexure A.

111. White Oak does not know and therefore cannot admit paragraph 10A.48FF of the BCC/TM Annexure A and paragraph 101 of the IAL Annexure A.

112. In reply to paragraph 10A.48GG of the BCC/TM Annexure A and paragraph 102 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40; and

(b) otherwise does not know and therefore cannot admit the paragraph.

113. In reply to paragraph 10A.48HH of the BCC/TM Annexure A and paragraph 103 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33; and

(b) otherwise does not know and therefore cannot admit the paragraph.

114. White Oak does not know and therefore cannot admit paragraph 10A.48II of the BCC/TM Annexure A and paragraph 104 of the IAL Annexure A.

115. White Oak does not know and therefore cannot admit paragraph 10A.48JJ of the BCC/TM Annexure A and paragraph 105 of the IAL Annexure A.

116. In reply to paragraph 10A.48KK of the BCC/TM Annexure A and paragraph 106 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

117. In reply to paragraph 10A.48LL of the BCC/TM Annexure A and paragraph 107 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

118. In reply to paragraph 10A.48MM of the BCC/TM Annexure A and paragraph 108 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 100 to 109, 111 to 113 and 115 to 117 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

119. White Oak does not know and therefore cannot admit paragraph 10A.48NN of the BCC/TM Annexure A and paragraph 109 of the IAL Annexure A.

120. In reply to paragraph 10A.48OO of the BCC/TM Annexure A and paragraph 110 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 118 and 119 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent Misrepresentation

121. In reply to paragraph 10A.48PP of the BCC/TM Annexure A and paragraph 111 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 110, 111 and 119 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D1.2 Liberty TCUK Non-Disclosures

Knowledge of underlying matters

122. White Oak does not know and therefore cannot admit paragraph 10A.51 of the BCC/TM Annexure A and paragraph 112 of the IAL Annexure A.

123. White Oak does not know and therefore cannot admit paragraph 10A.51A of the BCC/TM Annexure A and paragraph 113 of the IAL Annexure A.

124. In reply to paragraph 10A.52 of the BCC/TM Annexure A and paragraph 114 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

125. In reply to paragraph 10A.53 of the BCC/TM Annexure A and paragraph 115 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

126. White Oak does not know and therefore cannot admit paragraph 10A.53A of the BCC/TM Annexure A and paragraph 116 of the IAL Annexure A.

127. In reply to paragraph 10A.53B of the BCC/TM Annexure A and paragraph 117 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) does not know and therefore cannot the paragraph.

128. White Oak does not know and therefore cannot admit paragraph 10A.53C of the BCC/TM Annexure A and paragraph 118 of the IAL Annexure A.

129. In reply to paragraph 10A.53D of the BCC/TM Annexure A and paragraph 119 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

130. In reply to paragraph 10A.53E of the BCC/TM Annexure A and paragraph 120 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

131. White Oak does not know and therefore cannot admit paragraph 10A.54 of the BCC/TM Annexure A and paragraph 121 of the IAL Annexure A.

132. White Oak does not know and therefore cannot admit paragraph 10A.55 of the BCC/TM Annexure A and paragraph 122 of the IAL Annexure A.

133. In reply to paragraph 10A.56 of the BCC/TM Annexure A and paragraph 123 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

134. In reply to paragraph 10A.57 of the BCC/TM Annexure A and paragraph 124 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

135. White Oak does not know and therefore cannot admit paragraph 10A.57A of the BCC/TM Annexure A and paragraph 125 of the IAL Annexure A.

136. White Oak does not know and therefore cannot admit paragraph 10A.57B of the BCC/TM Annexure A and paragraph 126 of the IAL Annexure A.

137. In reply to paragraph 10A.57C of the BCC/TM Annexure A and paragraph 127 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

138. In reply to paragraph 10A.57D of the BCC/TM Annexure A and paragraph 128 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

139. White Oak does not know and therefore cannot admit paragraph 10A.57E of the BCC/TM Annexure A and paragraph 129 of the IAL Annexure A.

140. White Oak does not know and therefore cannot admit paragraph 10A.57F of the BCC/TM Annexure A and paragraph 130 of the IAL Annexure A.

141. In reply to paragraph 10A.57G of the BCC/TM Annexure A and paragraph 131 of the IAL Annexure A, White Oak:

~~(a) says there is no paragraphs 64A and 64B in Annexure A;~~

(a) repeats paragraph<u>s</u> 37 <u>and 122</u> above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

142. White Oak does not know and therefore cannot admit paragraph 10A.58 of the BCC/TM Annexure A and paragraph 132 of the IAL Annexure A.

143. In reply to paragraphs 10A.59 of the BCC/TM Annexure A and paragraph 133 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 122 to 141; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

144. In reply to paragraphs 10A.60 of the BCC/TM Annexure A and paragraph 134 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 131, 133, 134, 137 to 141 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

145. White Oak does not know and therefore cannot admit paragraph 10A.61 of the BCC/TM Annexure A and paragraph 135 of the IAL Annexure A.

146. White Oak does not know and therefore cannot admit paragraph 10A.62 of the BCC/TM Annexure A and paragraph 136 of the IAL Annexure A.

147. White Oak does not know and therefore cannot admit paragraph 10A.63 of the BCC/TM Annexure A and paragraph 137 of the IAL Annexure A.

Innocent non-disclosure

148. In reply to paragraph 10A.64 of the BCC/TM Annexure A and paragraph 138 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 142, 143, 145 and 146 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D2 SSUK

D2.1 Policy and endorsements

149. In reply to paragraph 10A.65 of the BCC/TM Annexure A and paragraph 139 of the IAL Annexure A, White Oak:

(a) refers to paragraph 137 of the Fifth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD169/2023 (**CS 5ASOC**) for its full force and effect;

(b) says it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D2.2 SSUK Misrepresentations

SSUK Future AR Facility Representations

150. White Oak does not know and therefore cannot admit paragraph 10A.65A of the BCC/TM Annexure A and paragraph 140 of the IAL Annexure A.

151. White Oak does not know and therefore cannot admit paragraph 10A.66 of the BCC/TM Annexure A and paragraph 141 of the IAL Annexure A.

152. White Oak does not know and therefore cannot admit paragraph 10A.67 of the BCC/TM Annexure A and paragraph 142 of the IAL Annexure A.

153. White Oak does not know and therefore cannot admit paragraph 10A.68 of the BCC/TM Annexure A and paragraph 143 of the IAL Annexure A.

154. In reply to paragraph 10A.69 of the BCC/TM Annexure A and paragraph 144 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 150 to 153 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

155. In reply to paragraph 10A.70 of the BCC/TM Annexure A and paragraph 145 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 46 and 150 to 154 above; and

(b) does not know and therefore cannot admit the paragraph.

156. In reply to paragraph 10A.71 of the BCC/TM Annexure A and paragraph 146 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39, 40 and 13 above; and

(b) does not know and therefore cannot admit the paragraph.

SSUK Purpose representation

157. In reply to paragraph 10A.71A of the BCC/TM Annexure A and paragraph 147 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 150 to 154 above; and

(b) does not know and therefore cannot admit the paragraph.

158. In reply to paragraph 10A.71B of the BCC/TM Annexure A and paragraph 148 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39, 40 and ~~13~~44 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

SSUK Account Debtor representations

159. White Oak does not know and therefore cannot admit paragraph 10A.72 of the BCC/TM Annexure A and paragraph 149 of the IAL Annexure A.

160. White Oak does not know and therefore cannot admit paragraph 10A.73 of the BCC/TM Annexure A and paragraph 150 of the IAL Annexure A.

161. In reply to paragraph 10A.74 of the BCC/TM Annexure A and paragraph 151 of the IAL Annexure A, White Oak:

(a) repeats paragraph 159 above; and

(b) does not know and therefore cannot admit the paragraph.

162. In reply to paragraph 10A.75 of the BCC/TM Annexure A and paragraph 152 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39, 40 and ~~13~~44 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

163. White Oak does not know and therefore cannot admit paragraph 10A.76 of the BCC/TM Annexure A and paragraph 153 of the IAL Annexure A.

164. White Oak does not know and therefore cannot admit paragraph 10A.77 of the BCC/TM Annexure A and paragraph 154 of the IAL Annexure A.

Representations were misleading

165. White Oak does not know and therefore cannot admit paragraph 10A.78 of the BCC/TM Annexure A and paragraph 155 of the IAL Annexure A.

166. White Oak does not know and therefore cannot admit paragraph 10A.78A of the BCC/TM Annexure A and paragraph 156 of the IAL Annexure A.

167. White Oak does not know and therefore cannot admit paragraph 10A.79 of the BCC/TM Annexure A and paragraph 157 of the IAL Annexure A.

Knowledge of falsity of representations

168. White Oak does not know and therefore cannot admit paragraph 10A.80 of the BCC/TM Annexure A and paragraph 158 of the IAL Annexure A.

169. White Oak does not know and therefore cannot admit paragraph 10A.81 of the BCC/TM Annexure A and paragraph 159 of the IAL Annexure A.

170. White Oak does not know and therefore cannot admit paragraph 10A.81A of the BCC/TM Annexure A and paragraph 160 of the IAL Annexure A.

171. In reply to paragraph 10A.82 of the BCC/TM Annexure A and paragraph 161 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

172. In reply to paragraph 10A.83 of the BCC/TM Annexure A and paragraph 162 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

173. White Oak does not know and therefore cannot admit paragraph 10A.84 of the BCC/TM Annexure A and paragraph 163 of the IAL Annexure A.

174. White Oak does not know and therefore cannot admit paragraph 10A.85 of the BCC/TM Annexure A and paragraph 164 of the IAL Annexure A.

175. White Oak does not know and therefore cannot admit paragraph 10A.85A of the BCC/TM Annexure A and paragraph 165 of the IAL Annexure A.

176. In reply to paragraph 10A.86 of the BCC/TM Annexure A and paragraph 166 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

177. In reply to paragraph 10A.87 of the BCC/TM Annexure A and paragraph 167 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

178. White Oak does not know and therefore cannot admit paragraph 10A.88 of the BCC/TM Annexure A and paragraph 168 of the IAL Annexure A.

179. White Oak does not know and therefore cannot admit paragraph 10A.89 of the BCC/TM Annexure A and paragraph 169 of the IAL Annexure A.

180. White Oak does not know and therefore cannot admit paragraph 10A.89A of the BCC/TM Annexure A and paragraph 170 of the IAL Annexure A.

181. In reply to paragraph 10A.90 of the BCC/TM Annexure A and paragraph 171 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

182. In reply to paragraph 10A.91 of the BCC/TM Annexure A and paragraph 172 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

183. White Oak does not know and therefore cannot admit paragraph 10A.92 of the BCC/TM Annexure A and paragraph 173 of the IAL Annexure A.

184. White Oak does not know and therefore cannot admit paragraph 10A.93 of the BCC/TM Annexure A and paragraph 174 of the IAL Annexure A.

185. White Oak does not know and therefore cannot admit paragraph 10A.93A of the BCC/TM Annexure A and paragraph 175 of the IAL Annexure A.

186. In reply to paragraph 10A.94 of the BCC/TM Annexure A and paragraph 176 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

187. In reply to paragraph 10A.95 of the BCC/TM Annexure A and paragraph 177 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

188. In reply to paragraph 10A.96 of the BCC/TM Annexure A and paragraph 178 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 150 to 156, 165, 168, 171 to 173, 176 to 178, 181 to 183, 186 and 187 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

189. In reply to paragraph 10A.96A of the BCC/TM Annexure A and paragraph 179 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 150 to 154, 157, 158, 165, 169, 171, 172, 174, 176, 177, 179, 181, 182, 184, 186 and 187 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

190. In reply to paragraph 10A.97 of the BCC/TM Annexure A and paragraph 180 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 150 to 154, 159 to 164, 167, 170, 171, 172, 175 to 177, 180 to 182 and 185 to 187 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

191. White Oak does not know and therefore cannot admit paragraph 10A.98 of the BCC/TM Annexure A and paragraph 181 of the IAL Annexure A.

192. White Oak does not know and therefore cannot admit paragraph 10A.98A of the BCC/TM Annexure A and paragraph 182 of the IAL Annexure A.

193. White Oak does not know and therefore cannot admit paragraph 10A.99 of the BCC/TM Annexure A and paragraph 183 of the IAL Annexure A.

194. In reply to paragraph 10A.100 of the BCC/TM Annexure A and paragraph 184 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 165 to 193 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

195. In reply to paragraph 10A.101 of the BCC/TM Annexure A and paragraph 185 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 165, 166, 191, 192 and 193 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D2.3 SSUK Non-Disclosures

Knowledge of material underlying non-disclosures

196. White Oak does not know and therefore cannot admit paragraph 10A.102 of the BCC/TM Annexure A and paragraph 186 of the IAL Annexure A.

197. In reply to paragraph 10A.103 of the BCC/TM Annexure A and paragraph 187 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

198. In reply to paragraph 10A.104 of the BCC/TM Annexure A and paragraph 188 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

199. White Oak does not know and therefore cannot admit paragraph 10A.105 of the BCC/TM Annexure A and paragraph 189 of the IAL Annexure A.

200. In reply to paragraph 10A.106 of the BCC/TM Annexure A and paragraph 190 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

201. In reply to paragraph 10A.107 of the BCC/TM Annexure A and paragraph 191 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

202. White Oak does not know and therefore cannot admit paragraph 10A.107A of the BCC/TM Annexure A and paragraph 192 of the IAL Annexure A.

203. In reply to paragraph 10A.107B of the BCC/TM Annexure A and paragraph 193 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37 and 200 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

204. White Oak does not know and therefore cannot admit paragraph 10A.108 of the BCC/TM Annexure A and paragraph 194 of the IAL Annexure A.

205. White Oak does not know and therefore cannot admit paragraph 10A.109 of the BCC/TM Annexure A and paragraph 195 of the IAL Annexure A.

206. In reply to paragraph 10A.110 of the BCC/TM Annexure A and paragraph 196 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

207. In reply to paragraph 10A.111 of the BCC/TM Annexure A and paragraph 197 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

208. White Oak does not know and therefore cannot admit paragraph 10A.112 of the BCC/TM Annexure A and paragraph 198 of the IAL Annexure A.

209. White Oak does not know and therefore cannot admit paragraph 10A.113 of the BCC/TM Annexure A and paragraph 199 of the IAL Annexure A.

210. In reply to paragraph 10A.114 of the BCC/TM Annexure A and paragraph 200 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

211. In reply to paragraph 10A.115 of the BCC/TM Annexure A and paragraph 201 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

212. White Oak does not know and therefore cannot admit paragraph 10A.115A of the BCC/TM Annexure A and paragraph 202 of the IAL Annexure A.

213. White Oak does not know and therefore cannot admit paragraph 10A.115B of the BCC/TM Annexure A and paragraph 203 of the IAL Annexure A.

214. In reply to paragraph 10A.115C of the BCC/TM Annexure A and paragraph 204 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30 and 200 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

215. White Oak does not know and therefore cannot admit paragraph 10A.116 of the BCC/TM Annexure A and paragraph 205 of the IAL Annexure A.

216. In reply to paragraph 10A.117 of the BCC/TM Annexure A and paragraph 206 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 197 to 211 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

217. In reply to paragraph 10A.118 of the BCC/TM Annexure A and paragraph 207 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 197, 198, 200, 201, 204, 206, 207, 208, 210 and 211 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

218. White Oak does not know and therefore cannot admit paragraph 10A.119 of the BCC/TM Annexure A and paragraph 208 of the IAL Annexure A.

219. White Oak does not know and therefore cannot admit paragraph 10A.120 of the BCC/TM Annexure A and paragraph 209 of the IAL Annexure A.

220. In reply to paragraph 10A.121 of the BCC/TM Annexure A and paragraph 210 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 217 to 219 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

221. In reply to paragraph 10A.122 of the BCC/TM Annexure A and paragraph 211 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 215, 216, 218 and 219; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D3 Westford

D3.1 Policy and Endorsements

222. In reply to paragraph 10A.123 of the BCC/TM Annexure A and paragraph 213 of the IAL Annexure A, White Oak:

(a) refers to paragraph 136 of the CS 5ASOC;

(b) says it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D3.1A Westford Misrepresentations

223. White Oak does not know and therefore cannot admit paragraph 10A.123A of the BCC/TM Annexure A and paragraph 214 of the IAL Annexure A.

224. White Oak does not know and therefore cannot admit paragraph 10A.123B of the BCC/TM Annexure A and paragraph 215 of the IAL Annexure A.

225. White Oak does not know and therefore cannot admit paragraph 10A.123C of the BCC/TM Annexure A and paragraph 216 of the IAL Annexure A.

226. In reply to paragraph 10A.123D of the BCC/TM Annexure A and paragraph 217 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

227. White Oak does not know and therefore cannot admit paragraph 10A.123E of the BCC/TM Annexure A and paragraph 218 of the IAL Annexure A.

228. White Oak does not know and therefore cannot admit paragraph 10A.123F of the BCC/TM Annexure A and paragraph 219 of the IAL Annexure A.

229. White Oak does not know and therefore cannot admit paragraph 10A.123G of the BCC/TM Annexure A and paragraph 220 of the IAL Annexure A.

230. White Oak does not know and therefore cannot admit paragraph 10A.123H of the BCC/TM Annexure A and paragraph 221 of the IAL Annexure A.

231. White Oak does not know and therefore cannot admit paragraph 10A.123I of the BCC/TM Annexure A and paragraph 222 of the IAL Annexure A.

232. White Oak does not know and therefore cannot admit paragraph 10A.123J of the BCC/TM Annexure A and paragraph 223 of the IAL Annexure A.

233. White Oak does not know and therefore cannot admit paragraph 10A.123K of the BCC/TM Annexure A and paragraph 224 of the IAL Annexure A.

234. White Oak does not know and therefore cannot admit paragraph 10A.123L of the BCC/TM Annexure A and paragraph 225 of the IAL Annexure A.

Representations were misleading

235. White Oak does not know and therefore cannot admit paragraph 10A.123M of the BCC/TM Annexure A and paragraph 226 of the IAL Annexure A.

Knowledge of falsity of representations

236. White Oak does not know and therefore cannot admit paragraph 10A.123N of the BCC/TM Annexure A and paragraph 227 of the IAL Annexure A.

237. In reply to paragraph 10A.123O of the BCC/TM Annexure A and paragraph 228 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

238. In reply to paragraph 10A.123P of the BCC/TM Annexure A and paragraph 229 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

239. White Oak does not know and therefore cannot admit paragraph 10A.123Q of the BCC/TM Annexure A and paragraph 231 of the IAL Annexure A.

240. White Oak does not know and therefore cannot admit paragraph 10A.123R of the BCC/TM Annexure A and paragraph 232 of the IAL Annexure A.

241. In reply to paragraph 10A.123S of the BCC/TM Annexure A and paragraph 233 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

242. In reply to paragraph 10A.123T of the BCC/TM Annexure A and paragraph 234 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

243. In reply to paragraph 10A.123U of the BCC/TM Annexure A and paragraph 235 of the IAL Annexure A, White Oak:

~~(a) says there are no paragraphs 10A.129M to 10A.129T in the BCC/TM Annexure A and assumes it was intended to refer to paragraphs 10A.123M to 10A.123T;~~

(a) repeats paragraphs 235 to 242 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

244. White Oak does not know and therefore cannot admit paragraph 10A.123V of the BCC/TM Annexure A and paragraph 236 of the IAL Annexure A.

245. In reply to paragraph 10A.123W of the BCC/TM Annexure A and paragraph 237 of the IAL Annexure A, White Oak:

~~(a) says there are no paragraphs 10A.129M to 10A.129T in the BCC/TM Annexure A and assumes it was intended to refer to paragraphs 10A.123M to 10A.123V;~~

(a) repeats paragraphs 235 to 244 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

246. In reply to paragraph 10A.123X of the BCC/TM Annexure A and paragraph 238 of the IAL Annexure A, White Oak:

~~(a) says there is no paragraph 10A.129V in the BCC/TM Annexure A and assumes it was intended to refer to paragraph 10A.123V;~~

(a) repeats paragraphs 235 to 244 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D3.2 Westford Non-Disclosures

Knowledge of underlying matters

247. White Oak does not know and therefore cannot admit paragraph 10A.130 of the BCC/TM Annexure A and paragraph 240 of the IAL Annexure A.

248. In reply to paragraph 10A.131 of the BCC/TM Annexure A and paragraph 241 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

249. In reply to paragraph 10A.132 of the BCC/TM Annexure A and paragraph 242 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

250. White Oak does not know and therefore cannot admit paragraph 10A.132A of the BCC/TM Annexure A and paragraph 243 of the IAL Annexure A.

251. In reply to paragraph 10A.132B of the BCC/TM Annexure A and paragraph 244 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

252. In reply to paragraph 10A.132C of the BCC/TM Annexure A and paragraph 245 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

253. White Oak does not know and therefore cannot admit paragraph 10A.133 of the BCC/TM Annexure A and paragraph 246 of the IAL Annexure A.

254. White Oak does not know and therefore cannot admit paragraph 10A.134 of the BCC/TM Annexure A and paragraph 247 of the IAL Annexure A.

255. In reply to paragraph 10A.135 of the BCC/TM Annexure A and paragraph 248 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

256. In reply to paragraph 10A.136 of the BCC/TM Annexure A and paragraph 249 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

257. White Oak does not know and therefore cannot admit paragraph 10A.136A of the BCC/TM Annexure A and paragraph 250 of the IAL Annexure A.

258. White Oak does not know and therefore cannot admit paragraph 10A.136B of the BCC/TM Annexure A and paragraph 251 of the IAL Annexure A.

259. In reply to paragraph 10A.136C of the BCC/TM Annexure A and paragraph 252 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

260. In reply to paragraph 10A.136D of the BCC/TM Annexure A and paragraph 253 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

261. White Oak does not know and therefore cannot admit paragraph 10A.137 of the BCC/TM Annexure A and paragraph 254 of the IAL Annexure A.

262. In reply to paragraph 10A.138 of the BCC/TM Annexure A and paragraph 255 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 248 to 260 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

263. In reply to paragraph 10A.139 of the BCC/TM Annexure A and paragraph 256 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 255 to 260 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

264. White Oak does not know and therefore cannot admit paragraph 10A.140 of the BCC/TM Annexure A and paragraph 257 of the IAL Annexure A.

265. White Oak does not know and therefore cannot admit paragraph 10A.141 of the BCC/TM Annexure A and paragraph 258 of the IAL Annexure A.

266. In reply to paragraph 10A.142 of the BCC/TM Annexure A and paragraph 259 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 263 to 265 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

267. In reply to paragraph 10A.143 of the BCC/TM Annexure A and paragraph 260 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 261, 262, 264 and 265 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D4 LIBERTY HOUSE

D4.1 Policy and Endorsements

268. In reply to paragraph 10A.144 of the BCC/TM Annexure A and paragraph 262 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 133 and 474 of the CS 6ASOC;

(b) says it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D4.2 Liberty House Misrepresentations

269. White Oak does not know and therefore cannot admit paragraph 10A.145 of the BCC/TM Annexure A and paragraph 263 of the IAL Annexure A.

270. White Oak does not know and therefore cannot admit paragraph 10A.146 of the BCC/TM Annexure A and paragraph 264 of the IAL Annexure A.

271. White Oak does not know and therefore cannot admit paragraph 10A.147 of the BCC/TM Annexure A and paragraph 265 of the IAL Annexure A.

272. White Oak does not know and therefore cannot admit paragraph 10A.148 of the BCC/TM Annexure A and paragraph 266 of the IAL Annexure A.

273. White Oak does not know and therefore cannot admit paragraph 10A.149 of the BCC/TM Annexure A and paragraph 267 of the IAL Annexure A.

274. White Oak does not know and therefore cannot admit paragraph 10A.150 of the BCC/TM Annexure A and paragraph 268 of the IAL Annexure A.

275. White Oak does not know and therefore cannot admit paragraph 10A.151 of the BCC/TM Annexure A and paragraph 269 of the IAL Annexure A.

276. White Oak does not know and therefore cannot admit paragraph 10A.152 of the BCC/TM Annexure A and paragraph 270 of the IAL Annexure A.

277. White Oak does not know and therefore cannot admit paragraph 10A.153 of the BCC/TM Annexure A and paragraph 271 of the IAL Annexure A.

278. In reply to paragraph 10A.153A of the BCC/TM Annexure A and paragraph 272 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 269 to 272 above; and

(b) does not know and therefore cannot admit paragraph the paragraph.

279. In reply to paragraph 10A.154 of the BCC/TM Annexure A and paragraph 273 of the IAL Annexure A, White Oak:

(a) repeats paragraph 278; and

(b) does not know and therefore cannot admit paragraph the paragraph.

280. In reply to paragraph 10A.154B of the BCC/TM Annexure A and paragraph 274 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 273 to 277 above; and

(b) does not know and therefore cannot admit paragraph the paragraph.

281. White Oak does not know and therefore cannot admit paragraph 10A.154C of the BCC/TM Annexure A and paragraph 275 of the IAL Annexure A.

282. White Oak does not know and therefore cannot admit paragraph 10A.154D of the BCC/TM Annexure A and paragraph 276 of the IAL Annexure A.

283. In reply to paragraph 10A.154E of the BCC/TM Annexure A and paragraph 277 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 31, 32, 33, 36, 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit paragraph the paragraph.

Representations were misleading

284. White Oak does not know and therefore cannot admit paragraph 10A.155 of the BCC/TM Annexure A and paragraph 278 of the IAL Annexure A.

285. White Oak does not know and therefore cannot admit paragraph 10A.156 of the BCC/TM Annexure A and paragraph 279 of the IAL Annexure A.

286. White Oak does not know and therefore cannot admit paragraph 10A.156A of the BCC/TM Annexure A and paragraph 280 of the IAL Annexure A.

Knowledge of falsity of representations

287. White Oak does not know and therefore cannot admit paragraph 10A.157 of the BCC/TM Annexure A and paragraph 281 of the IAL Annexure A.

288. White Oak does not know and therefore cannot admit paragraph 10A.158 of the BCC/TM Annexure A and paragraph 282 of the IAL Annexure A.

289. White Oak does not know and therefore cannot admit paragraph 10A.159 of the BCC/TM Annexure A and paragraph 283 of the IAL Annexure A.

290. In reply to paragraph 10A.160 of the BCC/TM Annexure A and paragraph 284 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 35 and 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

291. In reply to paragraph 10A.161 of the BCC/TM Annexure A and paragraph 285 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

292. White Oak does not know and therefore cannot admit paragraph 10A.162 of the BCC/TM Annexure A and paragraph 286 of the IAL Annexure A.

293. In reply to paragraph 10A.163 of the BCC/TM Annexure A and paragraph 287 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

294. In reply to paragraph 10A.164 of the BCC/TM Annexure A and paragraph 288 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

295. White Oak does not know and therefore cannot admit paragraph 10A.165 of the BCC/TM Annexure A and paragraph 289 of the IAL Annexure A.

296. In reply to paragraph 10A.167 of the BCC/TM Annexure A and paragraph 290 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

297. In reply to paragraph 10A.168 of the BCC/TM Annexure A and paragraph 291 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

298. White Oak does not know and therefore cannot admit paragraph 10A.169 of the BCC/TM Annexure A and paragraph 292 of the IAL Annexure A.

299. White Oak does not know and therefore cannot admit paragraph 293 of the IAL Annexure A.

300. In reply to paragraph 10A.170 of the BCC/TM Annexure A and paragraph 294 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

301. In reply to paragraph 10A.171 of the BCC/TM Annexure A and paragraph 295 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

302. In reply to paragraph 10A.172 of the BCC/TM Annexure A and paragraph 296 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 270 to 301; and

(b) otherwise does not know and therefore cannot admit the paragraph.

303. White Oak does not know and therefore cannot admit paragraph 10A.173 of the BCC/TM Annexure A and paragraph 297 of the IAL Annexure A.

304. In reply to paragraph 10A.174 of the BCC/TM Annexure A and paragraph 298 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 278 to 303 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

305. In reply to paragraph 10A.175 of the BCC/TM Annexure A and paragraph 299 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 278 to 304 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D4.3 Liberty House Non-Disclosures

Knowledge of material underlying non-disclosures

306. White Oak does not know and therefore cannot admit paragraph 10A.176 of the BCC/TM Annexure A and paragraph 300 of the IAL Annexure A.

307. In reply to paragraph 10A.177 of the BCC/TM Annexure A and paragraph 301 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

308. In reply to paragraph 10A.178 of the BCC/TM Annexure A and paragraph 302 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

309. White Oak does not know and therefore cannot admit paragraph 10A.179 of the BCC/TM Annexure A and paragraph 303 of the IAL Annexure A.

310. White Oak does not know and therefore cannot admit paragraph 10A.180 of the BCC/TM Annexure A and paragraph 304 of the IAL Annexure A.

311. In reply to paragraph 10A.181 of the BCC/TM Annexure A and paragraph 305 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

312. In reply to paragraph 10A.182 of the BCC/TM Annexure A and paragraph 306 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

313. White Oak does not know and therefore cannot admit paragraph 10A.183 of the BCC/TM Annexure A and paragraph 307 of the IAL Annexure A.

314. In reply to paragraph 10A.184 of the BCC/TM Annexure A and paragraph 308 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 307 to 312 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

315. In reply to paragraph 10A.185 of the BCC/TM Annexure A and paragraph 309 of the IAL Annexure A, White Oak:

(a) White Oak repeats paragraphs 307 to 309, 311 and 312 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

316. White Oak does not know and therefore cannot admit paragraph 10A.186 of the BCC/TM Annexure A and paragraph 310 of the IAL Annexure A.

317. White Oak does not know and therefore cannot admit paragraph 10A.187 of the BCC/TM Annexure A and paragraph 311 of the IAL Annexure A.

318. In reply to paragraph 10A.188 of the BCC/TM Annexure A and paragraph 312 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 315 to 317 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

319. In reply to paragraph 10A.189 of the BCC/TM Annexure A and paragraph 313 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 313, 314, 316 and 317 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D5 LIBERTY COMMODITIES LIMITED

D5.1 Policy and Endorsements

320. In reply to paragraph 10A.190 of the BCC/TM Annexure A and paragraph 314 of the IAL Annexure A, White Oak:

(a) relies on the terms of Endorsements No. 19 and 19(ii) for their full force and effect;

(b) in respect of the allegations relating to the "White Oak Proceeding":

(i) repeats paragraphs 38 to 41A, 46 and 52 to 53 of the WO 5ASOC;

(ii) says that White Oak makes no allegation in respect of Endorsement No. 19(i);

(iii) otherwise admits the paragraph; and

(c) in respect of the allegations relating to the "CS Global Proceeding" and the "LCL Proceeding":

(i) refers to paragraph 128 of the CS 6ASOC, and paragraph 145 of the Fifth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD175/2023 (**LCL 5ASOC**); and

(ii) otherwise does not know and therefore cannot admit the paragraph.

321. In reply to paragraph 10A.191 of the BCC/TM Annexure A and paragraph 315 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 139, 140, 145 and 147 of the LCL 5ASOC; and

(b) otherwise does not know and therefore cannot admit the paragraph.

322. In reply to paragraph 10A.192 of the BCC/TM Annexure A and paragraph 316 of the IAL Annexure A, White Oak:

(a) refers to paragraph 128 of the CS 6ASOC for its full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

323. In reply to paragraph 10A.192A of the BCC/TM Annexure A and paragraph 317 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 38 to 41A and 46 to 59D of the WO 5ASOC; and

(b) otherwise admits the paragraph.

D5.2 LCL Misrepresentations

324. In reply to paragraph 10A.194A of the BCC/TM Annexure A and paragraph 318 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect;

(b) says the particularised attachment was a draft “Indicative Term Sheet” “Accounts receivable Finance Proposal presented to Liberty Commodities Ltd by Greensill Capital (UK) Limited” that, among other things, referred to the “Sellers” as LCL and any affiliates of Liberty House Group Pte Ltd which are acceptable to a “Buyer

Representative" and the "Buyer Representative" and "Buyer" as GCUK; and

(c) otherwise does not know and therefore cannot admit the paragraph.

325. In reply to paragraph 10A.194B of the BCC/TM Annexure A and paragraph 319 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect;

(b) says the particularised email from Craig Pinnington was addressed to the "Credit Committee", referred to an "attached RCAP and CAP to support request on Liberty Commodities Ltd" for, among other things, "a new AR deal" and stated in a table headed "New Deal / Facility Information" that the "Proposed Facility Size" included, among others, "US$100m AR"; and

(c) otherwise does not know and therefore cannot admit the paragraph.

326. In reply to paragraph 10A.194C of the BCC/TM Annexure A and paragraph 320 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised document and relies on that document for its full force and effect;

(b) says the particularised document comprises an email from Miroslav Knezickjr with the subject "GREENSILL CAPITAL – CREDIT COMMITTEE MEETING – MINUTES FRIDAY 26th OCTOBER 2018" and states under the heading "GFFG-Alliance- Liberty Commodities Limited" the "Decision" was "Approved on a unanimous basis" and that the "Approval" was, among other things, "New facility Valid for acceptance and/or drawdown for 3 months from the date of this approval"; and

(c) otherwise does not know and therefore cannot admit the paragraph.

327. In reply to paragraph 10A.194D of the BCC/TM Annexure A and paragraph 321 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 24 to 31 of the WO 5ASOC; and

(b) otherwise admits the paragraph.

328. In reply to paragraph 10A.195 of the BCC/TM Annexure A and paragraph 322 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised document and relies on the document for their full force and effect;

(b) says the particularised document comprises an email from Marsh to Brereton which referred to, among other things, “another high importance request from Greensill for Gulf and Phoenix”; and

(c) otherwise does not know and therefore cannot admit the paragraph..

329. In reply to paragraph 10A.196 of the BCC/TM Annexure A and paragraph 323 of the IAL Annexure A, White Oak:

(a) repeats paragraph 328 above;

(b) admits the existence of the particularised document and relies on that document for its full force and effect; and

(c) otherwise admits the paragraph.

330. In reply to paragraph 10A.197 of the BCC/TM Annexure A and paragraph 324 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

331. In reply to paragraph 10A.198 of the BCC/TM Annexure A and paragraph 325 of the IAL Annexure A, White Oak:

(a) repeats paragraph 320(a) to (b) above; and

(b) otherwise admits the paragraph.

332. In reply to paragraph 10A.199 of the BCC/TM Annexure A and paragraph 326 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 38 to 41A and 46 of the WO 5ASOC;

(b) relies on the terms of each of the Customer Endorsements for their full force and effect;

(c) admits the endorsements pleaded in paragraphs 10A.199(a)(ii), (iii), (xiii), (xiv) and (xvi) and 10A.199(b) of the BCC/TM Annexure A, and

paragraphs 326 (a)(ii), (iii), (xiii), (xiv) and (xvi) and 326(b) of the IAL Annexure A were executed by BCC as agent and Authorised Representative of the Insurer; and

(d) otherwise does not know and therefore cannot admit the paragraph.

333. In reply to paragraph 10A.200 of the BCC/TM Annexure A and paragraph 327 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 321 to 323 and 332 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

334. In reply to paragraph 10A.201 of the BCC/TM Annexure A and paragraph 328 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 41A and 46 of the WO 5ASOC;

(b) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(c) otherwise does not know and therefore cannot admit the paragraph.

335. In reply to paragraph 10A.202 of the BCC/TM Annexure A and paragraph 329 of the IAL Annexure A, White Oak:

(a) repeats paragraph 334 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

336. In reply to paragraph 10A.203 of the BCC/TM Annexure A and paragraph 330 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39, 40 and 335 above; and

(b) otherwise does not know and therefore cannot admit the paragraph

337. In reply to paragraph 10A.204 of the BCC/TM Annexure A and paragraph 331 of the IAL Annexure A, White Oak:

(a) repeats paragraph 334 above;

(b) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(c) otherwise does not know and therefore cannot admit the paragraph.

338. In reply to paragraph 10A.204A of the BCC/TM Annexure A and paragraph 332 of the IAL Annexure A, White Oak:

(a) repeats paragraph 337 above;

(b) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(c) otherwise does not know and therefore cannot admit the paragraph.

339. In reply to paragraph 10A.205 of the BCC/TM Annexure A and paragraph 333 of the IAL Annexure A, White Oak:

~~(a) says it assumes the chapeau of paragraph 10A.205 of the BCC/TM Annexure A was intended to refer to paragraph 10A.204 of the BCC/TM Annexure A;~~

(a) repeats paragraph 337 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

340. In reply to paragraph 10A.206 of the BCC/TM Annexure A and paragraph 334 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39, 40 and 339 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

341. In reply to paragraph 10A.207 of the BCC/TM Annexure A and paragraph 335 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise denies the paragraph.

342. In reply to paragraph 10A.208 of the BCC/TM Annexure A and paragraph 336 of the IAL Annexure A, White Oak:

(a) repeats paragraph 341 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

343. In reply to paragraph 10A.209 of the BCC/TM Annexure A and paragraph 337 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39, 40 and 342 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

344. In reply to paragraph 10A.209A of the BCC/TM Annexure A and paragraph 338 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 332 and 334 above;

(b) says each draft endorsement referred to in paragraph 10A.199(b) of the BCC/TM Annexure A and 326(b) of the IAL Annexure A recorded a maximum tenor of 90 days; and

(c) otherwise does not know and therefore cannot admit the paragraph.

345. In reply to paragraph 10A.210 of the BCC/TM Annexure A and paragraph 339 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 24 to 31 of the WO 5ASOC;

(b) relies on the terms of the RPA for its full force and effect;

(c) admits the existence of the particularised documents and relies on those documents for their full force and effect;

(d) says the particularised email only attached the Deed of Amendment and Restatement executed on 6 December 2019;

(e) admits that Sanjeev Gupta signed the RPA and the Deed of Amendment and Restatement executed on 6 December 2019 on behalf of LCL; and

(f) otherwise denies the paragraph.

346. In reply to paragraph 10A.211 of the BCC/TM Annexure A and paragraph 340 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 344 and 345 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

347. In reply to paragraph 10A.212 of the BCC/TM Annexure A and paragraph 341 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39, 40 and 346 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

348. In reply to paragraph 10A.212AA of the BCC/TM Annexure A and paragraph 342 of the IAL Annexure A, White Oak:

(a) admits the existence of the particularised document and relies on the document for its full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

349. In reply to paragraph 10A.212AB of the BCC/TM Annexure A and paragraph 343 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 337, 338, 344, 345 and 348 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

350. In reply to paragraph 10A.212AC of the BCC/TM Annexure A and paragraph 344 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39, 40 and 349 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Representations were misleading

351. In reply to paragraph 10A.212A of the BCC/TM Annexure A and paragraph 345 of the IAL Annexure A, White Oak:

(a) in respect of the customers the subject of the Customer Endorsements referred to in paragraph 46(b) to (n) of the WO 5ASOC, admits the existence of the particularised documents and relies on those documents for their full force and effect; and

(b) otherwise does not know and therefore cannot admit the paragraph.

352. In reply to paragraph 10A.213 of the BCC/TM Annexure A and paragraph 346 of the IAL Annexure A, White Oak:

(a) repeats paragraph 335 above; and

(b) does not know and therefore cannot admit the paragraph.

353. In reply to paragraph 10A.214 of the BCC/TM Annexure A and paragraph 347 of the IAL Annexure A, White Oak:

(a) repeats paragraph 339 above; and

(b) does not know and therefore cannot admit the paragraph.

354. In reply to paragraph 10A.215 of the BCC/TM Annexure A and paragraph 348 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 342, 352 and 353 above; and

(b) does not know and therefore cannot admit the paragraph.

355. In reply to paragraph 10A.216 of the BCC/TM Annexure A and paragraph 349 of the IAL Annexure A, White Oak:

(a) repeats paragraph 346 above; and

(b) does not know and therefore cannot admit the paragraph.

356. In reply to paragraph 10A.216A of the BCC/TM Annexure A and paragraph 350 of the IAL Annexure A, White Oak:

(a) repeats paragraph 349 above; and

(b) does not know and therefore cannot admit the paragraph.

Knowledge of falsity of representations

357. White Oak does not know and therefore cannot admit paragraph 10A.217 of the BCC/TM Annexure A and paragraph 351 of the IAL Annexure A.

358. White Oak does not know and therefore cannot admit paragraph 10A.218 of the BCC/TM Annexure A and paragraph 352 of the IAL Annexure A.

359. White Oak does not know and therefore cannot admit paragraph 10A.219 of the BCC/TM Annexure A and paragraph 353 of the IAL Annexure A.

360. White Oak does not know and therefore cannot admit paragraph 10A.220 of the BCC/TM Annexure A and paragraph 354 of the IAL Annexure A.

361. White Oak does not know and therefore cannot admit paragraph 10A.220A of the BCC/TM Annexure A and paragraph 355 of the IAL Annexure A.

362. In reply to paragraph 10A.221 of the BCC/TM Annexure A and paragraph 356 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

363. In reply to paragraph 10A.222 of the BCC/TM Annexure A and paragraph 357 of the IAL Annexure A, White Oak :

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

364. White Oak does not know and therefore cannot admit paragraph 10A.223 of the BCC/TM Annexure A and paragraph 358 of the IAL Annexure A.

365. White Oak does not know and therefore cannot admit paragraph 10A.224 of the BCC/TM Annexure A and paragraph 359 of the IAL Annexure A.

366. White Oak does not know and therefore cannot admit paragraph 10A.225 of the BCC/TM Annexure A and paragraph 360 of the IAL Annexure A.

367. White Oak does not know and therefore cannot admit paragraph 10A.226 of the BCC/TM Annexure A and paragraph 361 of the IAL Annexure A.

368. White Oak does not know and therefore cannot admit paragraph 10A.226A of the BCC/TM Annexure A and paragraph 362 of the IAL Annexure A.

369. In reply to paragraph 10A.227 of the BCC/TM Annexure A and paragraph 363 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

370. In reply to paragraph 10A.228 of the BCC/TM Annexure A and paragraph 364 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

371. White Oak does not know and therefore cannot admit paragraph 10A.228A of the BCC/TM Annexure A and paragraph 365 of the IAL Annexure A.

372. White Oak does not know and therefore cannot admit paragraph 10A.228B of the BCC/TM Annexure A and paragraph 366 of the IAL Annexure A.

373. White Oak does not know and therefore cannot admit paragraph 10A.228C of the BCC/TM Annexure A and paragraph 367 of the IAL Annexure A.

374. White Oak does not know and therefore cannot admit paragraph 10A.228D of the BCC/TM Annexure A and paragraph 368 of the IAL Annexure A.

375. White Oak does not know and therefore cannot admit paragraph 10A.228E of the BCC/TM Annexure A and paragraph 369 of the IAL Annexure A.

376. In reply to paragraph 10A.228F of the BCC/TM Annexure A and paragraph 370 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

377. In reply to paragraph 10A.228G of the BCC/TM Annexure A and paragraph 371 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

378. White Oak does not know and therefore cannot admit paragraph 10A.229 of the BCC/TM Annexure A and paragraph 372 of the IAL Annexure A.

379. White Oak denies paragraph 10A.229A of the BCC/TM Annexure A and paragraph 373 of the IAL Annexure A.

380. In reply to paragraph 10A.230 of the BCC/TM Annexure A and paragraph 374 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

381. In reply to paragraph 10A.231 of the BCC/TM Annexure A and paragraph 375 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

382. White Oak does not know and therefore cannot admit paragraph 10A.232 of the BCC/TM Annexure A and paragraph 376 of the IAL Annexure A.

383. White Oak denies paragraph 10A.232A of the BCC/TM Annexure A and paragraph 377 of the IAL Annexure A.

384. In reply to paragraph 10A.233 of the BCC/TM Annexure A and paragraph 378 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

385. In reply to paragraph 10A.234 of the BCC/TM Annexure A and paragraph 379 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

386. White Oak does not know and therefore cannot admit paragraph 10A.234A of the BCC/TM Annexure A and paragraph 380 of the IAL Annexure A.

387. White Oak denies paragraph 10A.234AB of the BCC/TM Annexure A and paragraph 381 of the IAL Annexure A.

388. In reply to paragraph 10A.234B of the BCC/TM Annexure A and paragraph 382 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

389. In reply to paragraph 10A.234C of the BCC/TM Annexure A and paragraph 383 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

390. In reply to paragraph 10A.235 of the BCC/TM Annexure A and paragraph 384 of the IAL Annexure A, White Oak:

(a) says it assumes the chapeau of paragraph 10A.235 of the BCC/TM Annexure A was intended to refer to paragraph 10A.194 of the BCC/TM Annexure A;

(b) repeats paragraphs 324 to 389 above; and

(c) otherwise does not know and therefore cannot admit the paragraph.

391. White Oak does not know and therefore cannot admit paragraph 10A.236 of the BCC/TM Annexure A and paragraph 385 of the IAL Annexure A.

392. White Oak does not know and therefore cannot admit paragraph 10A.237 of the BCC/TM Annexure A and paragraph 386 of the IAL Annexure A.

393. White Oak does not know and therefore cannot admit paragraph 10A.238 of the BCC/TM Annexure A and paragraph 387 of the IAL Annexure A.

394. White Oak does not know and therefore cannot admit paragraph 10A.239A of the BCC/TM Annexure A and paragraph 388 of the IAL Annexure A.

395. In reply to paragraph 10A.240 of the BCC/TM Annexure A and paragraph 389 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 352 to 394 above; and

(b) otherwise denies the paragraph.

Innocent misrepresentation

396. In reply to paragraph 10A.241 of the BCC/TM Annexure A and paragraph 390 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 352 to 356 and 391 to 394 above; and

(b) otherwise denies the paragraph.

D5.3 LCL Non-Disclosures

Knowledge of underlying matters

397. White Oak does not know and therefore cannot admit paragraph 10A.242 of the BCC/TM Annexure A and paragraph 391 of the IAL Annexure A.

398. In reply to paragraph 10A.243 of the BCC/TM Annexure A and paragraph 392 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

399. In reply to paragraph 10A.244 of the BCC/TM Annexure A and paragraph 393 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

400. White Oak does not know and therefore cannot admit paragraph 10A.245 of the BCC/TM Annexure A and paragraph 394 of the IAL Annexure A.

401. In reply to paragraph 10A.246 of the BCC/TM Annexure A and paragraph 395 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

402. In reply to paragraph 10A.247 of the BCC/TM Annexure A and paragraph 396 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

403. White Oak does not know and therefore cannot admit paragraph 10A.247A of the BCC/TM Annexure A and paragraph 397 of the IAL Annexure A.

404. In reply to paragraph 10A.247B of the BCC/TM Annexure A and paragraph 398 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

405. In reply to paragraph 10A.247C of the BCC/TM Annexure A and paragraph 399 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

406. White Oak does not know and therefore cannot admit paragraph 10A.247D of the BCC/TM Annexure A and paragraph 400 of the IAL Annexure A.

407. In reply to paragraph 10A.247E of the BCC/TM Annexure A and paragraph 401 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

408. White Oak does not know and therefore cannot admit paragraph 10A.248 of the BCC/TM Annexure A and paragraph 402 of the IAL Annexure A.

409. White Oak denies paragraph 10A.249 of the BCC/TM Annexure A and paragraph 403 of the IAL Annexure A.

410. In reply to paragraph 10A.250 of the BCC/TM Annexure A and paragraph 404 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

411. In reply to paragraph 10A.251 of the BCC/TM Annexure A and paragraph 405 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

412. White Oak does not know and therefore cannot admit paragraph 10A.252 of the BCC/TM Annexure A and paragraph 406 of the IAL Annexure A.

413. White Oak denies paragraph 10A.253 of the BCC/TM Annexure A and paragraph 407 of the IAL Annexure A.

414. In reply to paragraph 10A.254 of the BCC/TM Annexure A and paragraph 408 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

415. In reply to paragraph 10A.255 of the BCC/TM Annexure A and paragraph 409 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

416. White Oak does not know and therefore cannot admit paragraph 10A.255A of the BCC/TM Annexure A and paragraph 410 of the IAL Annexure A.

417. White Oak denies paragraph 10A.255B of the BCC/TM Annexure A and paragraph 411 of the IAL Annexure A.

418. In reply to paragraph 10A.255C of the BCC/TM Annexure A and paragraph 412 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

419. In reply to paragraph 10A.255D of the BCC/TM Annexure A and paragraph 413 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

420. White Oak does not know and therefore cannot admit paragraph 10A.255E of the BCC/TM Annexure A and paragraph 414 of the IAL Annexure A.

421. White Oak denies paragraph 10A.255F of the BCC/TM Annexure A and paragraph 415 of the IAL Annexure A.

422. In reply to paragraph 10A.255G of the BCC/TM Annexure A and paragraph 416 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

423. White Oak does not know and therefore cannot admit paragraph 10A.256 of the BCC/TM Annexure A and paragraph 417 of the IAL Annexure A.

424. In reply to paragraph 10A.257 of the BCC/TM Annexure A and paragraph 418 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 398 to 422 above; and

(b) otherwise denies the paragraph.

Fraudulent non-disclosure

425. In reply to paragraph 10A.258 of the BCC/TM Annexure A and paragraph 419 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 398, 399, 401, 402, 404, 405, 407, 408, 410 to 412, 414 and 415 to 422 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

426. White Oak does not know and therefore cannot admit paragraph 10A.259 of the BCC/TM Annexure A and paragraph 420 of the IAL Annexure A.

427. White Oak does not know and therefore cannot admit paragraph 10A.260 of the BCC/TM Annexure A and paragraph 421 of the IAL Annexure A.

428. In reply to paragraph 10A.261 of the BCC/TM Annexure A and paragraph 422 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 425 to 427 above; and

(b) otherwise denies the paragraph.

Innocent non-disclosure

429. In reply to paragraph 10A.262 of the BCC/TM Annexure A and paragraph 423 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 423, 424, 426 and 427 above; and

(b) otherwise denies the paragraph.

D6 ATLANTIC 57

D6.1 Policy and Endorsements

430. In reply to paragraph 10A.263 of the BCC/TM Annexure A and paragraph 425 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 161 and 163 of the Second Amended Statement of claim filed in Federal Court of Australia proceedings numbered NSD173/2023;

(b) says that it does not make any claim as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D6.2 Atlantic 57 Misrepresentations

431. White Oak does not know and therefore cannot admit paragraph 10A.264 of the BCC/TM Annexure A and paragraph 426 of the IAL Annexure A.

432. White Oak does not know and therefore cannot admit paragraph 10A.265 of the BCC/TM Annexure A and paragraph 427 of the IAL Annexure A.

433. In reply to paragraph 10A.266 of the BCC/TM Annexure A and paragraph 428 of the IAL Annexure A. White Oak:

(a) repeats paragraph 432 above; and

(b) does not know and therefore cannot admit the paragraph.

434. In reply to paragraph 10A.267 of the BCC/TM Annexure A and paragraph 429 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

435. White Oak does not know and therefore cannot admit paragraph 10A.268 of the BCC/TM Annexure A and paragraph 430 of the IAL Annexure A.

436. White Oak does not know and therefore cannot admit paragraph 10A.269 of the BCC/TM Annexure A and paragraph 431 of the IAL Annexure A.

437. White Oak does not know and therefore cannot admit paragraph 10A.270 of the BCC/TM Annexure A and paragraph 432 of the IAL Annexure A.

Settlement Agreement

438. White Oak does not know and therefore cannot admit paragraph 10A.270A of the BCC/TM Annexure A and paragraph 433 of the IAL Annexure A.

A57 Renewal

439. White Oak does not know and therefore cannot admit paragraph 10A.271 of the BCC/TM Annexure A and paragraph 434 of the IAL Annexure A.

440. White Oak does not know and therefore cannot admit paragraph 10A.272 of the BCC/TM Annexure A and paragraph 435 of the IAL Annexure A.

441. White Oak does not know and therefore cannot admit paragraph 10A.273 of the BCC/TM Annexure A and paragraph 436 of the IAL Annexure A.

442. In reply to paragraph 10A.273A of the BCC/TM Annexure A and paragraph 437 of the IAL Annexure A, White Oak:

(a) repeats paragraph 441 above; and

(b) does not know and therefore cannot admit the paragraph.

443. White Oak does not know and therefore cannot admit paragraph 10A.276 of the BCC/TM Annexure A and paragraph 438 of the IAL Annexure A.

Representations were misleading

444. White Oak does not know and therefore cannot admit paragraph 10A.277 of the BCC/TM Annexure A and paragraph 439 of the IAL Annexure A.

445. White Oak does not know and therefore cannot admit paragraph 10A.278 of the BCC/TM Annexure A and paragraph 440 of the IAL Annexure A.

446. White Oak does not know and therefore cannot admit paragraph 10A.278A of the BCC/TM Annexure A and paragraph 441 of the IAL Annexure A.

447. White Oak does not know and therefore cannot admit paragraph 10A.278B of the BCC/TM Annexure A and paragraph 442 of the IAL Annexure A.

Knowledge of falsity of representations

448. White Oak does not know and therefore cannot admit paragraph 10A.279 of the BCC/TM Annexure A and paragraph 443 of the IAL Annexure A.

449. White Oak does not know and therefore cannot admit paragraph 10A.280 of the BCC/TM Annexure A and paragraph 444 of the IAL Annexure A.

450. White Oak does not know and therefore cannot admit paragraph 10A.280A of the BCC/TM Annexure A and paragraph 445 of the IAL Annexure A.

451. White Oak does not know and therefore cannot admit paragraph 10A.280B of the BCC/TM Annexure A and paragraph 445 of the IAL Annexure A.

452. In reply to paragraph 10A.281 of the BCC/TM Annexure A and paragraph 446 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

453. In reply to paragraph 10A.282 of the BCC/TM Annexure A and paragraph 447 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

454. White Oak does not know and therefore cannot admit paragraph 10A.282A of the BCC/TM Annexure A and paragraph 448 of the IAL Annexure A.

455. In reply to paragraph 10A.282B of the BCC/TM Annexure A and paragraph 449 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

456. In reply to paragraph 10A.282C of the BCC/TM Annexure A and paragraph 450 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

457. White Oak does not know and therefore cannot admit paragraph 10A.283 of the BCC/TM Annexure A and paragraph 451 of the IAL Annexure A.

458. White Oak does not know and therefore cannot admit paragraph 10A.283A of the BCC/TM Annexure A and paragraph 452 of the IAL Annexure A.

459. White Oak does not know and therefore cannot admit paragraph 10A.284 of the BCC/TM Annexure A and paragraph 453 of the IAL Annexure A.

460. White Oak does not know and therefore cannot admit paragraph 10A.284A of the BCC/TM Annexure A and paragraph 454 of the IAL Annexure A.

461. In reply to paragraph 10A.285 of the BCC/TM Annexure A and paragraph 455 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

462. In reply to paragraph 10A.286 of the BCC/TM Annexure A and paragraph 456 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

463. White Oak does not know and therefore cannot admit paragraph 10A.286A of the BCC/TM Annexure A and paragraph 457 of the IAL Annexure A.

464. White Oak does not know and therefore cannot admit paragraph 10A.286AB of the BCC/TM Annexure A and paragraph 458 of the IAL Annexure A.

465. In reply to paragraph 10A.286B of the BCC/TM Annexure A and paragraph 459 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

466. In reply to paragraph 10A.286C of the BCC/TM Annexure A and paragraph 460 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

467. In reply to paragraph 10A.287 of the BCC/TM Annexure A and paragraph 461 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 448, 452, 453, 457, 461 and 462 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

468. In reply to paragraph 10A.288 of the BCC/TM Annexure A and paragraph 462 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 449, 452, 453, 459, 461 and 462 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

469. In reply to paragraph 10A.288A of the BCC/TM Annexure A and paragraph 463 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 438, 446, 450, 452, 453, 459, 461 and 462 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

470. In reply to paragraph 10A.288B of the BCC/TM Annexure A and paragraph 464 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 442, 447, 451, 452, 453, 459, 461 and 462 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

471. White Oak does not know and therefore cannot admit paragraph 10A.289 of the BCC/TM Annexure A and paragraph 465 of the IAL Annexure A.

472. White Oak does not know and therefore cannot admit paragraph 10A.290 of the BCC/TM Annexure A and paragraph 466 of the IAL Annexure A.

473. White Oak does not know and therefore cannot admit paragraph 10A.290A of the BCC/TM Annexure A and paragraph 467 of the IAL Annexure A.

474. In reply to paragraph 10A.291 of the BCC/TM Annexure A and paragraph 468 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 471 to 473 above; and

(b) does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

475. In reply to paragraph 10A.292 of the BCC/TM Annexure A and paragraph 469 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 444, 445, 447, 471, 472 and 473 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D6.3 Atlantic 57 Non-Disclosures

Knowledge of underlying matters

476. White Oak does not know and therefore cannot admit paragraph 10A.293 of the BCC/TM Annexure A and paragraph 470 of the IAL Annexure A.

477. In reply to paragraph 10A.294 of the BCC/TM Annexure A and paragraph 471 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

478. In reply to paragraph 10A.295 of the BCC/TM Annexure A and paragraph 472 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

479. White Oak does not know and therefore cannot admit paragraph 10A.295A of the BCC/TM Annexure A and paragraph 473 of the IAL Annexure A.

480. In reply to paragraph 10A.295B of the BCC/TM Annexure A and paragraph 474 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

481. White Oak does not know and therefore cannot admit paragraph 10A.297 of the BCC/TM Annexure A and paragraph 475 of the IAL Annexure A.

482. White Oak does not know and therefore cannot admit paragraph 10A.298 of the BCC/TM Annexure A and paragraph 476 of the IAL Annexure A.

483. In reply to paragraph 10A.299 of the BCC/TM Annexure A and paragraph 477 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

484. In reply to paragraph 10A.300 of the BCC/TM Annexure A and paragraph 478 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

485. White Oak does not know and therefore cannot admit paragraph 10A.300A of the BCC/TM Annexure A and paragraph 479 of the IAL Annexure A.

486. White Oak does not know and therefore cannot admit paragraph 10A.300B of the BCC/TM Annexure A and paragraph 480 of the IAL Annexure A.

487. In reply to paragraph 10A.300C of the BCC/TM Annexure A and paragraph 481 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

488. White Oak does not know and therefore cannot admit paragraph 10A.301 of the BCC/TM Annexure A and paragraph 482 of the IAL Annexure A.

489. In reply to paragraph 10A.302 of the BCC/TM Annexure A and paragraph 483 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 481 to 487 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

490. In reply to paragraph 10A.303 of the BCC/TM Annexure A and paragraph 484 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 481 to 487 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

491. White Oak does not know and therefore cannot admit paragraph 10A.304 of the BCC/TM Annexure A and paragraph 485 of the IAL Annexure A.

492. White Oak does not know and therefore cannot admit paragraph 10A.305 of the BCC/TM Annexure A and paragraph 486 of the IAL Annexure A.

493. In reply to paragraph 10A.306 of the BCC/TM Annexure A and paragraph 487 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 490 to 492 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

494. In reply to paragraph 10A.307 of the BCC/TM Annexure A and paragraph 488 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 488, 489, 491 and 492 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D7 Liberty Delta

D7.1 Policy and Endorsements

495. In reply to paragraph 10A.308 of the BCC/TM Annexure A and paragraph 489 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 66A, 67 and 68 of the Fifth Amended Statement of claim filed in Federal Court of Australia proceedings numbered NSD602/2023;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

496. In reply to paragraph 10A.309 of the BCC/TM Annexure A and paragraph 490 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 165 of the Fifth Amended Statement of claim filed in Federal Court of Australia proceedings numbered NSD602/2023;

(b) denies that it makes any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

497. In reply to paragraph 10A.310 of the BCC/TM Annexure A and paragraph 491 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 168, 170, 176A and 179 of the Fifth Amended Statement of claim filed in Federal Court of Australia proceedings numbered NSD602/2023;

(b) denies that it makes any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

498. In reply to paragraph 10A.311 of the BCC/TM Annexure A and paragraph 492 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 496 to 497 above; and

(b) otherwise does know and therefore cannot admit the paragraph.

D7.2 Liberty Delta Misrepresentations

Representations

499. White Oak does not know and therefore cannot admit paragraph 10A.311A of the BCC/TM Annexure A and paragraph 493 of the IAL Annexure A.

500. White Oak does not know and therefore cannot admit paragraph 10A.312 of the BCC/TM Annexure A and paragraph 494 of the IAL Annexure A.

501. White Oak does not know and therefore cannot admit paragraph 10A.313 of the BCC/TM Annexure A and paragraph 495 of the IAL Annexure A.

502. White Oak does not know and therefore cannot admit paragraph 10A.314 of the BCC/TM Annexure A and paragraph 496 of the IAL Annexure A.

503. In reply to paragraph 10A.315 of the BCC/TM Annexure A and paragraph 497 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 499 to 502 above; and

(b) does not know and therefore cannot admit the paragraph.

504. In reply to paragraph 10A.316 of the BCC/TM Annexure A and paragraph 498 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

505. White Oak does not know and therefore cannot admit paragraph 10A.317 of the BCC/TM Annexure A and paragraph 499 of the IAL Annexure A.

506. White Oak does not know and therefore cannot admit paragraph 10A.318 of the BCC/TM Annexure A and paragraph 500 of the IAL Annexure A.

507. White Oak does not know and therefore cannot admit paragraph 10A.319 of the BCC/TM Annexure A and paragraph 501 of the IAL Annexure A.

508. White Oak does not know and therefore cannot admit paragraph 10A.319A of the BCC/TM Annexure A and paragraph 502 of the IAL Annexure A.

509. In reply to paragraph 10A.319B of the BCC/TM Annexure A and paragraph 503 of the IAL Annexure A, White Oak:

(a) repeats paragraph 508 above; and

(b) does not know and therefore cannot admit the paragraph.

Representations were misleading

510. White Oak does not know and therefore cannot admit paragraph 10A.320 of the BCC/TM Annexure A and paragraph 504 of the IAL Annexure A.

511. White Oak does not know and therefore cannot admit paragraph 10A.321 of the BCC/TM Annexure A and paragraph 505 of the IAL Annexure A.

512. White Oak does not know and therefore cannot admit paragraph 10A.322 of the BCC/TM Annexure A and paragraph 506 of the IAL Annexure A.

513. White Oak does not know and therefore cannot admit paragraph 10A.322A of the BCC/TM Annexure A and paragraph 507 of the IAL Annexure A.

Knowledge of falsity of representations

514. White Oak does not know and therefore cannot admit paragraph 10A.323 of the BCC/TM Annexure A and paragraph 508 of the IAL Annexure A.

515. White Oak does not know and therefore cannot admit paragraph 10A.324 of the BCC/TM Annexure A and paragraph 509 of the IAL Annexure A.

516. White Oak does not know and therefore cannot admit paragraph 10A.325 of the BCC/TM Annexure A and paragraph 510 of the IAL Annexure A.

517. White Oak does not know and therefore cannot admit paragraph 10A.325A of the BCC/TM Annexure A and paragraph 511 of the IAL Annexure A.

518. In reply to paragraph 10A.326 of the BCC/TM Annexure A and paragraph 512 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

519. In reply to paragraph 10A.327 of the BCC/TM Annexure A and paragraph 513 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of falsity of representations

520. White Oak does not know and therefore cannot admit paragraph 10A.328 of the BCC/TM Annexure A and paragraph 514 of the IAL Annexure A.

521. In reply to paragraph 10A.329 of the BCC/TM Annexure A and paragraph 515 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

522. In reply to paragraph 10A.330 of the BCC/TM Annexure A and paragraph 516 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

523. In reply to paragraph 10A.331 of the BCC/TM Annexure A and paragraph 517 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 514 to 522 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

524. White Oak does not know and therefore cannot admit paragraph 10A.332 of the BCC/TM Annexure A and paragraph 518 of the IAL Annexure A.

525. In reply to paragraph 10A.333 of the BCC/TM Annexure A and paragraph 519 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 510 to 524 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

526. In reply to paragraph 10A.334 of the BCC/TM Annexure A and paragraph 520 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 510 to 524 and 524 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D7.3 Liberty Delta Non-Disclosures

Knowledge of underlying matters

527. White Oak does not know and therefore cannot admit paragraph 10A.335 of the BCC/TM Annexure A and paragraph 521 of the IAL Annexure A.

528. White Oak does not know and therefore cannot admit paragraph 10A.335A of the BCC/TM Annexure A and paragraph 522 of the IAL Annexure A.

529. In reply to paragraph 10A.336 of the BCC/TM Annexure A and paragraph 523 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

530. In reply to paragraph 10A.337 of the BCC/TM Annexure A and paragraph 524 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

531. In reply to paragraph 10A.337A of the BCC/TM Annexure A and paragraph 525 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

532. White Oak does not know and therefore cannot admit paragraph 10A.338 of the BCC/TM Annexure A and paragraph 526 of the IAL Annexure A.

533. White Oak does not know and therefore cannot admit paragraph 10A.339 of the BCC/TM Annexure A and paragraph 527 of the IAL Annexure A.

534. White Oak does not know and therefore cannot admit paragraph 10A.339A of the BCC/TM Annexure A and paragraph 528 of the IAL Annexure A.

535. White Oak does not know and therefore cannot admit paragraph 10A.339B of the BCC/TM Annexure A and paragraph 529 of the IAL Annexure A.

536. In reply to paragraph 10A.340 of the BCC/TM Annexure A and paragraph 530 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

537. In reply to paragraph 10A.341 of the BCC/TM Annexure A and paragraph 531 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

538. In reply to paragraph 10A.341A of the BCC/TM Annexure A and paragraph 532 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

539. White Oak does not know and therefore cannot admit paragraph 10A.342 of the BCC/TM Annexure A and paragraph 533 of the IAL Annexure A.

540. White Oak does not know and therefore cannot admit paragraph 10A.343 of the BCC/TM Annexure A and paragraph 534 of the IAL Annexure A.

Fraudulent non-disclosure

541. In reply to paragraph 10A.344 of the BCC/TM Annexure A and paragraph 535 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 527, 529, 530, 532, 533, 536 and 537 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

542. In reply to paragraph 10A.344A of the BCC/TM Annexure A and paragraph 536 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 528, 531, 534, 535 and 538 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

543. White Oak does not know and therefore cannot admit paragraph 10A.345 of the BCC/TM Annexure A and paragraph 537 of the IAL Annexure A.

544. White Oak does not know and therefore cannot admit paragraph 10A.346 of the BCC/TM Annexure A and paragraph 538 of the IAL Annexure A.

545. In reply to paragraph 10A.347 of the BCC/TM Annexure A and paragraph 539 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 527 to 544 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

546. In reply to paragraph 10A.348 of the BCC/TM Annexure A and paragraph 540 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 539, 540, 543 and 544 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D8 SIMEC

D8.1 Policy and Endorsements

547. In reply to paragraph 10A.349 of the BCC/TM Annexure A and paragraph 541 of the IAL Annexure A, White Oak:

(a) refers to paragraph 125 of the CS 5ASOC and paragraphs 147 to 149 of the Fifth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD177/2023;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

548. In reply to paragraph 10A.350 of the BCC/TM Annexure A and paragraph 542 of the IAL Annexure A, White Oak:

(a) refers to paragraph 125 of the CS 5ASOC and paragraphs 150 to 155 of the Fifth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD177/2023;

(b) denies that it makes any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

549. In reply to paragraph 10A.351 of the BCC/TM Annexure A and paragraph 543 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 547 to 548; and

(b) otherwise does know and therefore cannot admit the paragraph.

D8.2 Simec Misrepresentations

Representations

550. White Oak does not know and therefore cannot admit paragraph 10A.352 of the BCC/TM Annexure A and paragraph 544 of the IAL Annexure A.

551. White Oak does not know and therefore cannot admit paragraph 10A.355 of the BCC/TM Annexure A and paragraph 545 of the IAL Annexure A.

552. White Oak does not know and therefore cannot admit paragraph 10A.355A of the BCC/TM Annexure A and paragraph 546 of the IAL Annexure A.

553. White Oak does not know and therefore cannot admit paragraph 10A.356 of the BCC/TM Annexure A and paragraph 547 of the IAL Annexure A.

554. White Oak does not know and therefore cannot admit paragraph 10A.357 of the BCC/TM Annexure A and paragraph 548 of the IAL Annexure A.

555. White Oak does not know and therefore cannot admit paragraph 10A.357A of the BCC/TM Annexure A and paragraph 549 of the IAL Annexure A.

556. White Oak does not know and therefore cannot admit paragraph 10A.358 of the BCC/TM Annexure A and paragraph 550 of the IAL Annexure A.

557. White Oak does not know and therefore cannot admit paragraph 10A.359 of the BCC/TM Annexure A and paragraph 551 of the IAL Annexure A.

558. White Oak does not know and therefore cannot admit paragraph 10A.359A of the BCC/TM Annexure A and paragraph 552 of the IAL Annexure A.

559. White Oak does not know and therefore cannot admit paragraph 10A.360 of the BCC/TM Annexure A and paragraph 553 of the IAL Annexure A.

560. White Oak does not know and therefore cannot admit paragraph 10A.361 of the BCC/TM Annexure A and paragraph 554 of the IAL Annexure A.

561. White Oak does not know and therefore cannot admit paragraph 10A.362 of the BCC/TM Annexure A and paragraph 555 of the IAL Annexure A.

562. White Oak does not know and therefore cannot admit paragraph 10A.363 of the BCC/TM Annexure A and paragraph 556 of the IAL Annexure A.

563. White Oak does not know and therefore cannot admit paragraph 10A.364 of the BCC/TM Annexure A and paragraph 557 of the IAL Annexure A.

564. White Oak does not know and therefore cannot admit paragraph 10A.364A of the BCC/TM Annexure A and paragraph 558 of the IAL Annexure A.

565. White Oak does not know and therefore cannot admit paragraph 10A.365 of the BCC/TM Annexure A and paragraph 559 of the IAL Annexure A.

566. In reply to paragraph 10A.366 of the BCC/TM Annexure A and paragraph 560 of the IAL Annexure A, White Oak:

(a) repeats paragraph 563 above; and

(b) does not know and therefore cannot admit the paragraph.

567. In reply to paragraph 10A.367 of the BCC/TM Annexure A and paragraph 561 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 562 to 566 above; and

(b) does not know and therefore cannot admit the paragraph.

568. In reply to paragraph 10A.368 of the BCC/TM Annexure A and paragraph 562 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32 and 39 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

569. White Oak does not know and therefore cannot admit paragraph 10A.369 of the BCC/TM Annexure A and paragraph 563 of the IAL Annexure A.

570. White Oak does not know and therefore cannot admit paragraph 10A.369A of the BCC/TM Annexure A and paragraph 564 of the IAL Annexure A.

571. In reply to paragraph 10A.369B of the BCC/TM Annexure A and paragraph 565 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32 and 39 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

572. White Oak does not know and therefore cannot admit paragraph 10A.369C of the BCC/TM Annexure A and paragraph 566 of the IAL Annexure A.

Representations were misleading

573. White Oak does not know and therefore cannot admit paragraph 10A.370 of the BCC/TM Annexure A and paragraph 567 of the IAL Annexure A.

574. White Oak does not know and therefore cannot admit paragraph 10A.371 of the BCC/TM Annexure A and paragraph 568 of the IAL Annexure A.

575. White Oak does not know and therefore cannot admit paragraph 10A.371A of the BCC/TM Annexure A and paragraph 569 of the IAL Annexure A.

Knowledge of falsity of representations

576. White Oak does not know and therefore cannot admit paragraph 10A.372 of the BCC/TM Annexure A and paragraph 570 of the IAL Annexure A.

577. White Oak does not know and therefore cannot admit paragraph 10A.373 of the BCC/TM Annexure A and paragraph 571 of the IAL Annexure A.

578. White Oak does not know and therefore cannot admit paragraph 10A.374 of the BCC/TM Annexure A and paragraph 572 of the IAL Annexure A.

579. White Oak does not know and therefore cannot admit paragraph 573 of the IAL Annexure A.

580. In reply to paragraph 10A.375 of the BCC/TM Annexure A and paragraph 574 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

581. In reply to paragraph 10A.376 of the BCC/TM Annexure A and paragraph 575 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

582. White Oak does not know and therefore cannot admit paragraph 10A.376A of the BCC/TM Annexure A and paragraph 576 of the IAL Annexure A.

583. In reply to paragraph 10A.376B of the BCC/TM Annexure A and paragraph 577 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

584. In reply to paragraph 10A.376C of the BCC/TM Annexure A and paragraph 578 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

585. White Oak does not know and therefore cannot admit paragraph 10A.377 of the BCC/TM Annexure A and paragraph 579 of the IAL Annexure A.

586. White Oak does not know and therefore cannot admit paragraph 10A.377A of the BCC/TM Annexure A and paragraph 580 of the IAL Annexure A.

587. In reply to paragraph 10A.378 of the BCC/TM Annexure A and paragraph 581 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

588. In reply to paragraph 10A.379 of the BCC/TM Annexure A and paragraph 582 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

589. White Oak does not know and therefore cannot admit paragraph 10A.379A of the BCC/TM Annexure A and paragraph 583 of the IAL Annexure A.

590. In reply to paragraph 10A.379B of the BCC/TM Annexure A and paragraph 584 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

591. In reply to paragraph 10A.379C of the BCC/TM Annexure A and paragraph 585 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

592. In reply to paragraph 10A.380 of the BCC/TM Annexure A and paragraph 586 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 576 to 591 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

593. White Oak does not know and therefore cannot admit paragraph 10A.381 of the BCC/TM Annexure A and paragraph 587 of the IAL Annexure A.

594. In reply to paragraph 10A.382 of the BCC/TM Annexure A and paragraph 588 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 592 and 593 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

595. In reply to paragraph 10A.383 of the BCC/TM Annexure A and paragraph 589 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 573, 574, 575 and 593 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D8.3 Simec Non-Disclosures

Knowledge of underlying matters

596. White Oak does not know and therefore cannot admit paragraph 10A.384 of the BCC/TM Annexure A and paragraph 590 of the IAL Annexure A.

597. White Oak does not know and therefore cannot admit paragraph 10A.384A of the BCC/TM Annexure A and paragraph 591 of the IAL Annexure A.

598. White Oak does not know and therefore cannot admit paragraph 10A.384B of the BCC/TM Annexure A and paragraph 592 of the IAL Annexure A.

599. In reply to paragraph 10A.385 of the BCC/TM Annexure A and paragraph 593 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

600. In reply to paragraph 10A.386 of the BCC/TM Annexure A and paragraph 594 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

601. White Oak does not know and therefore cannot admit paragraph 10A.386A of the BCC/TM Annexure A and paragraph 595 of the IAL Annexure A.

602. In reply to paragraph 596 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37 and 38 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

603. White Oak does not know and therefore cannot admit paragraph 10A.387 of the BCC/TM Annexure A and paragraph 597 of the IAL Annexure A.

604. White Oak does not know and therefore cannot admit paragraph 10A.388 of the BCC/TM Annexure A and paragraph 598 of the IAL Annexure A.

605. In reply to paragraph 10A.389 of the BCC/TM Annexure A and paragraph 599 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

606. In reply to paragraph 10A.390 of the BCC/TM Annexure A and paragraph 600 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

607. White Oak does not know and therefore cannot admit paragraph 601 of the IAL Annexure A.

608. White Oak denies paragraph 602 of the IAL Annexure A.

609. In reply to paragraph 603 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37 and 38 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

610. White Oak does not know and therefore cannot admit paragraph 10A.391 of the BCC/TM Annexure A and paragraph 604 of the IAL Annexure A.

611. In reply to paragraph 10A.392 of the BCC/TM Annexure A and paragraph 605 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 599 to 606 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

612. In reply to paragraph 10A.393 of the BCC/TM Annexure A and paragraph 606 of the IAL Annexure A, White Oak:

(a) repeats paragraph 603 above; and

(b) does not know and therefore cannot admit the paragraph.

613. White Oak does not know and therefore cannot admit paragraph 10A.394 of the BCC/TM Annexure A and paragraph 607 of the IAL Annexure A.

614. White Oak does not know and therefore cannot admit paragraph 10A.395 of the BCC/TM Annexure A and paragraph 608 of the IAL Annexure A.

615. In reply to paragraph 10A.396 of the BCC/TM Annexure A and paragraph 609 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 612 to 614 above; and

(b) does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

616. In reply to paragraph 10A.397 of the BCC/TM Annexure A and paragraph 610 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 610, 611, 613 and 614 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D9 KERRY IRELAND

D9.1 Policy and Endorsements

617. In reply to paragraph 10A.398 of the BCC/TM Annexure A and paragraph 611 of the IAL Annexure A, White Oak:

(a) refers to paragraph 135 of the CS 6ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

618. White Oak does not know and therefore cannot admit paragraph 10A.399 of the BCC/TM Annexure A and paragraph 612 of the IAL Annexure A.

619. White Oak does not know and therefore cannot admit paragraph 10A.400 of the BCC/TM Annexure A and paragraph 613 of the IAL Annexure A.

620. White Oak does not know and therefore cannot admit paragraph 10A.401 of the BCC/TM Annexure A and paragraph 614 of the IAL Annexure A.

D9.2 Kelly Ireland Misrepresentations

621. White Oak does not know and therefore cannot admit paragraph 10A.402 of the BCC/TM Annexure A and paragraph 615 of the IAL Annexure A.

622. White Oak does not know and therefore cannot admit paragraph 10A.403 of the BCC/TM Annexure A and paragraph 616 of the IAL Annexure A.

623. White Oak does not know and therefore cannot admit paragraph 10A.404 of the BCC/TM Annexure A and paragraph 617 of the IAL Annexure A.

624. White Oak does not know and therefore cannot admit paragraph 10A.405 of the BCC/TM Annexure A and paragraph 618 of the IAL Annexure A.

625. In reply to paragraph 10A.406 of the BCC/TM Annexure A and paragraph 619 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 622 and 624 above; and

(b) does not know and therefore cannot admit the paragraph.

626. In reply to paragraph 10A.407 of the BCC/TM Annexure A and paragraph 620 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

627. White Oak does not know and therefore cannot admit paragraph 10A.408 of the BCC/TM Annexure A and paragraph 621 of the IAL Annexure A.

628. White Oak does not know and therefore cannot admit paragraph 10A.409 of the BCC/TM Annexure A and paragraph 622 of the IAL Annexure A.

629. White Oak does not know and therefore cannot admit paragraph 10A.410 of the BCC/TM Annexure A and paragraph 623 of the IAL Annexure A.

630. White Oak does not know and therefore cannot admit paragraph 10A.411 of the BCC/TM Annexure A and paragraph 624 of the IAL Annexure A.

631. White Oak does not know and therefore cannot admit paragraph 10A.412 of the BCC/TM Annexure A and paragraph 625 of the IAL Annexure A.

632. White Oak does not know and therefore cannot admit paragraph 10A.413 of the BCC/TM Annexure A and paragraph 626 of the IAL Annexure A.

633. White Oak does not know and therefore cannot admit paragraph 10A.414 of the BCC/TM Annexure A and paragraph 627 of the IAL Annexure A.

Representations were misleading

634. White Oak does not know and therefore cannot admit paragraph 10A.415 of the BCC/TM Annexure A and paragraph 628 of the IAL Annexure A.

Knowledge of falsity of representations

635. White Oak does not know and therefore cannot admit paragraph 10A.416 of the BCC/TM Annexure A and paragraph 629 of the IAL Annexure A.

636. In reply to paragraph 10A.417 of the BCC/TM Annexure A and paragraph 630 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

637. In reply to paragraph 10A.418 of the BCC/TM Annexure A and paragraph 631 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

638. White Oak does not know and therefore cannot admit paragraph 10A.418A of the BCC/TM Annexure A and paragraph 632 of the IAL Annexure A.

639. In reply to paragraph 10A.418B of the BCC/TM Annexure A and paragraph 633 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

640. In reply to paragraph 10A.418C of the BCC/TM Annexure A and paragraph 634 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of the materiality of representations

641. White Oak does not know and therefore cannot admit paragraph 10A.419 of the BCC/TM Annexure A and paragraph 635 of the IAL Annexure A.

642. White Oak does not know and therefore cannot admit paragraph 10A.419A of the BCC/TM Annexure A and paragraph 636 of the IAL Annexure A.

643. In reply to paragraph 10A.420 of the BCC/TM Annexure A and paragraph 637 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

644. In reply to paragraph 10A.421 of the BCC/TM Annexure A and paragraph 638 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

645. White Oak does not know and therefore cannot admit paragraph 10A.421A of the BCC/TM Annexure A and paragraph 639 of the IAL Annexure A.

646. White Oak does not know and therefore cannot admit paragraph 10A.421B of the BCC/TM Annexure A and paragraph 640 of the IAL Annexure A.

647. In reply to paragraph 10A.421C of the BCC/TM Annexure A and paragraph 641 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

648. In reply to paragraph 10A.421D of the BCC/TM Annexure A and paragraph 642 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

649. In reply to paragraph 10A.422 of the BCC/TM Annexure A and paragraph 643 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 641 to 648 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

650. White Oak does not know and therefore cannot admit paragraph 10A.423 of the BCC/TM Annexure A and paragraph 644 of the IAL Annexure A.

651. In reply to paragraph 10A.424 of the BCC/TM Annexure A and paragraph 645 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 649 and 650 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

652. In reply to paragraph 10A.425 of the BCC/TM Annexure A and paragraph 646 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 634 and 650 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D9.3 Kerry Ireland Non-Disclosures

Knowledge of underlying matters

653. White Oak does not know and therefore cannot admit paragraph 10A.426 of the BCC/TM Annexure A and paragraph 647 of the IAL Annexure A.

654. In reply to paragraph 10A.427 of the BCC/TM Annexure A and paragraph 648 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

655. In reply to paragraph 10A.428 of the BCC/TM Annexure A and paragraph 649 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

656. White Oak does not know and therefore cannot admit paragraph 10A.428A of the BCC/TM Annexure A and paragraph 650 of the IAL Annexure A.

657. In reply to paragraph 10A.428B of the BCC/TM Annexure A and paragraph 651 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

658. In reply to paragraph 10A.428C of the BCC/TM Annexure A and paragraph 652 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

659. White Oak does not know and therefore cannot admit paragraph 10A.429 of the BCC/TM Annexure A and paragraph 653 of the IAL Annexure A.

660. White Oak does not know and therefore cannot admit paragraph 10A.430 of the BCC/TM Annexure A and paragraph 654 of the IAL Annexure A.

661. In reply to paragraph 10A.431 of the BCC/TM Annexure A and paragraph 655 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

662. In reply to paragraph 10A.432 of the BCC/TM Annexure A and paragraph 656 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

663. White Oak does not know and therefore cannot admit paragraph 10A.432A of the BCC/TM Annexure A and paragraph 657 of the IAL Annexure A.

664. In reply to paragraph 10A.432B of the BCC/TM Annexure A and paragraph 658 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

665. In reply to paragraph 10A.432C of the BCC/TM Annexure A and paragraph 659 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

666. White Oak does not know and therefore cannot admit paragraph 10A.433 of the BCC/TM Annexure A and paragraph 660 of the IAL Annexure A.

667. In reply to paragraph 10A.434 of the BCC/TM Annexure A and paragraph 661 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 659 to 665 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

668. In reply to paragraph 10A.435 of the BCC/TM Annexure A and paragraph 662 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 659, 661 and 662 to 665 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

669. White Oak does not know and therefore cannot admit paragraph 10A.436 of the BCC/TM Annexure A and paragraph 663 of the IAL Annexure A.

670. White Oak does not know and therefore cannot admit paragraph 10A.437 of the BCC/TM Annexure A and paragraph 664 of the IAL Annexure A.

671. In reply to paragraph 10A.438 of the BCC/TM Annexure A and paragraph 665 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 668 to 670; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

672. In reply to paragraph 10A.439 of the BCC/TM Annexure A and paragraph 666 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 666, 667, 669 and 670 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D9A BAUER

D9.4 Policy and Endorsements

673. In reply to paragraph 10A.440 of the BCC/TM Annexure A and paragraph 667 of the IAL Annexure A, White Oak:

(a) refers to paragraph 135 of the CS 5ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D9.5 Bauer Misrepresentations

674. White Oak does not know and therefore cannot admit paragraph 10A.441 of the BCC/TM Annexure A and paragraph 668 of the IAL Annexure A.

675. White Oak does not know and therefore cannot admit paragraph 10A.442 of the BCC/TM Annexure A and paragraph 669 of the IAL Annexure A.

676. White Oak does not know and therefore cannot admit paragraph 10A.443 of the BCC/TM Annexure A and paragraph 670 of the IAL Annexure A.

677. In reply to paragraph 10A.444 of the BCC/TM Annexure A and paragraph 671 of the IAL Annexure A, White Oak:

(a) repeats paragraphs ~~673~~675 and 676 above; and

(b) does not know and therefore cannot admit the paragraph.

678. In reply to paragraph 10A.445 of the BCC/TM Annexure A and paragraph 672 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

679. In reply to paragraph 10A.446 of the BCC/TM Annexure A and paragraph 673 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

680. White Oak does not know and therefore cannot admit paragraph 10A.447 of the BCC/TM Annexure A and paragraph 674 of the IAL Annexure A.

681. White Oak does not know and therefore cannot admit paragraph 10A.448 of the BCC/TM Annexure A and paragraph 675 of the IAL Annexure A.

682. White Oak does not know and therefore cannot admit paragraph 10A.449 of the BCC/TM Annexure A and paragraph 676 of the IAL Annexure A.

683. In reply to paragraph 10A.450 of the BCC/TM Annexure A and paragraph 677 of the IAL Annexure A, White Oak:

(a) repeats paragraph 682 above; and

(b) does not know and therefore cannot admit the paragraph.

684. In reply to paragraph 10A.451 of the BCC/TM Annexure A and paragraph 678 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

685. White Oak does not know and therefore cannot admit paragraph 10A.452 of the BCC/TM Annexure A and paragraph 679 of the IAL Annexure A.

686. White Oak does not know and therefore cannot admit paragraph 10A.453 of the BCC/TM Annexure A and paragraph 680 of the IAL Annexure A.

687. White Oak does not know and therefore cannot admit paragraph 10A.454 of the BCC/TM Annexure A and paragraph 681 of the IAL Annexure A.

Representations were misleading

688. White Oak does not know and therefore cannot admit paragraph 10A.455 of the BCC/TM Annexure A and paragraph 682 of the IAL Annexure A.

689. White Oak does not know and therefore cannot admit paragraph 10A.456 of the BCC/TM Annexure A and paragraph 683 of the IAL Annexure A.

690. White Oak does not know and therefore cannot admit paragraph 10A.457 of the BCC/TM Annexure A and paragraph 684 of the IAL Annexure A.

Knowledge of falsity of representations

691. White Oak does not know and therefore cannot admit paragraph 10A.458 of the BCC/TM Annexure A and paragraph 685 of the IAL Annexure A.

692. In reply to paragraph 10A.459 of the BCC/TM Annexure A and paragraph 686 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

693. In reply to paragraph 10A.460 of the BCC/TM Annexure A and paragraph 687 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

694. White Oak does not know and therefore cannot admit paragraph 10A.461 of the BCC/TM Annexure A and paragraph 688 of the IAL Annexure A.

695. In reply to paragraph 10A.462 of the BCC/TM Annexure A and paragraph 689 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

696. In reply to paragraph 10A.463 of the BCC/TM Annexure A and paragraph 690 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

697. White Oak does not know and therefore cannot admit paragraph 10A.464 of the BCC/TM Annexure A and paragraph 691 of the IAL Annexure A.

698. White Oak does not know and therefore cannot admit paragraph 10A.465 of the BCC/TM Annexure A and paragraph 692 of the IAL Annexure A.

699. In reply to paragraph 10A.466 of the BCC/TM Annexure A and paragraph 693 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

700. In reply to paragraph 10A.467 of the BCC/TM Annexure A and paragraph 694 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

701. White Oak does not know and therefore cannot admit paragraph 10A.468 of the BCC/TM Annexure A and paragraph 695 of the IAL Annexure A.

702. White Oak does not know and therefore cannot admit paragraph 10A.469 of the BCC/TM Annexure A and paragraph 696 of the IAL Annexure A.

703. In reply to paragraph 10A.470 of the BCC/TM Annexure A and paragraph 697 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

704. In reply to paragraph 10A.471 of the BCC/TM Annexure A and paragraph 698 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

705. In reply to paragraph 10A.472 of the BCC/TM Annexure A and paragraph 699 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 697 to 704 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

706. White Oak does not know and therefore cannot admit paragraph 10A.473 of the BCC/TM Annexure A and paragraph 700 of the IAL Annexure A.

707. In reply to paragraph 10A.474 of the BCC/TM Annexure A and paragraph 701 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 688 to 704 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

708. In reply to paragraph 10A.475 of the BCC/TM Annexure A and paragraph 702 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 688, 689, 690 and 706 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D9.6 Bauer Non-Disclosure

Knowledge of underlying matters

709. White Oak does not know and therefore cannot admit paragraph 10A.476 of the BCC/TM Annexure A and paragraph 703 of the IAL Annexure A.

710. In reply to paragraph 10A.477 of the BCC/TM Annexure A and paragraph 704 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

711. In reply to paragraph 10A.478 of the BCC/TM Annexure A and paragraph 705 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

712. White Oak does not know and therefore cannot admit paragraph 10A.479 of the BCC/TM Annexure A and paragraph 706 of the IAL Annexure A.

713. White Oak does not know and therefore cannot admit paragraph 10A.480 of the BCC/TM Annexure A and paragraph 707 of the IAL Annexure A.

714. In reply to paragraph 10A.481 of the BCC/TM Annexure A and paragraph 708 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

715. In reply to paragraph 10A.482 of the BCC/TM Annexure A and paragraph 709 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

716. White Oak does not know and therefore cannot admit paragraph 10A.483 of the BCC/TM Annexure A and paragraph 710 of the IAL Annexure A.

717. In reply to paragraph 10A.484 of the BCC/TM Annexure A and paragraph 711 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

718. In reply to paragraph 10A.485 of the BCC/TM Annexure A and paragraph 712 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

719. White Oak does not know and therefore cannot admit paragraph 10A.486 of the BCC/TM Annexure A and paragraph 713 of the IAL Annexure A.

720. In reply to paragraph 10A.487 of the BCC/TM Annexure A and paragraph 714 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

721. In reply to paragraph 10A.488 of the BCC/TM Annexure A and paragraph 715 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

722. White Oak does not know and therefore cannot admit paragraph 10A.489 of the BCC/TM Annexure A and paragraph 716 of the IAL Annexure A.

723. White Oak does not know and therefore cannot admit paragraph 10A.490 of the BCC/TM Annexure A and paragraph 717 of the IAL Annexure A.

724. In reply to paragraph 10A.491 of the BCC/TM Annexure A and paragraph 718 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

725. In reply to paragraph 10A.492 of the BCC/TM Annexure A and paragraph 719 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

726. White Oak does not know and therefore cannot admit paragraph 10A.493 of the BCC/TM Annexure A and paragraph 720 of the IAL Annexure A.

727. White Oak does not know and therefore cannot admit paragraph 10A.494 of the BCC/TM Annexure A and paragraph 721 of the IAL Annexure A.

728. In reply to paragraph 10A.495 of the BCC/TM Annexure A and paragraph 722 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

729. In reply to paragraph 10A.496 of the BCC/TM Annexure A and paragraph 723 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

730. White Oak does not know and therefore cannot admit paragraph 10A.497 of the BCC/TM Annexure A and paragraph 724 of the IAL Annexure A.

731. White Oak does not know and therefore cannot admit paragraph 10A.498 of the BCC/TM Annexure A and paragraph 725 of the IAL Annexure A.

732. In reply to paragraph 10A.499 of the BCC/TM Annexure A and paragraph 726 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

733. In reply to paragraph 10A.500, White Oak of the BCC/TM Annexure A and paragraph 727 of the IAL Annexure A:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

734. White Oak does not know and therefore cannot admit paragraph 10A.501 of the BCC/TM Annexure A and paragraph 728 of the IAL Annexure A.

735. In reply to paragraph 10A.502 of the BCC/TM Annexure A and paragraph 729 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 709 to 733 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

736. In reply to paragraph 10A.503 of the BCC/TM Annexure A and paragraph 730 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 710, 711, 712, 714, 715, 717, 718, 720, 721, 724, 725, 728, 729, 732 and 733 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

737. White Oak does not know and therefore cannot admit paragraph 10A.504 of the BCC/TM Annexure A and paragraph 731 of the IAL Annexure A.

738. White Oak does not know and therefore cannot admit paragraph 10A.505 of the BCC/TM Annexure A and paragraph 732 of the IAL Annexure A.

739. In reply to paragraph 10A.506 of the BCC/TM Annexure A and paragraph 733 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 709 to 733 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

740. In reply to paragraph 10A.507 of the BCC/TM Annexure A and paragraph 734 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 734, 735 and 737 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D10.8 Policy and Endorsements

741. In reply to paragraph 53A.1 of the BCC/TM Annexure A and paragraph 735 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 126(a) and 254 of the CS 5ASOC and paragraph 146 of the Sixth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD174/2023;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

742. In reply to paragraph 53A.2 of the BCC/TM Annexure A and paragraph 736 of the IAL Annexure A, White Oak:

(a) refers to paragraph 143 of the Sixth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD174/2023;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

743. In reply to paragraph 53A.3 of the BCC/TM Annexure A and paragraph 737 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 126(b) of the CS 5ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

744. In reply to paragraph 53A.4 of the BCC/TM Annexure A and paragraph 738 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 742 and 743 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D10.9 Bluestone Multi-Obligor Misrepresentations

Representations

745. White Oak does not know and therefore cannot admit paragraph 53A.5 of the BCC/TM Annexure A and paragraph 739 of the IAL Annexure A.

746. White Oak does not know and therefore cannot admit paragraph 53A.6 of the BCC/TM Annexure A and paragraph 740 of the IAL Annexure A.

747. White Oak does not know and therefore cannot admit paragraph 53A.7 of the BCC/TM Annexure A and paragraph 741 of the IAL Annexure A.

748. White Oak does not know and therefore cannot admit paragraph 53A.8 of the BCC/TM Annexure A and paragraph 742 of the IAL Annexure A.

749. White Oak does not know and therefore cannot admit paragraph 53A.9 of the BCC/TM Annexure A and paragraph 743 of the IAL Annexure A.

750. In reply to paragraph 53A.10 of the BCC/TM Annexure A and paragraph 744 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 746 and 748 above; and

(b) does not know and therefore cannot admit the paragraph.

751. In reply to paragraph 53A.11 of the BCC/TM Annexure A and paragraph 745 of the IAL Annexure A, White Oak:

(a) repeats paragraph 750; and

(b) does not know and therefore cannot admit the paragraph.

752. In reply to paragraph 53A.12 of the BCC/TM Annexure A and paragraph 746 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

753. White Oak does not know and therefore cannot admit paragraph 53A.13 of the BCC/TM Annexure A and paragraph 747 of the IAL Annexure A.

Increase from USD140 million to USD400 million in December 2018

754. White Oak does not know and therefore cannot admit paragraph 53A.14 of the BCC/TM Annexure A and paragraph 748 of the IAL Annexure A.

755. White Oak does not know and therefore cannot admit paragraph 53A.15 of the BCC/TM Annexure A and paragraph 749 of the IAL Annexure A.

756. White Oak does not know and therefore cannot admit paragraph 53A.16 of the BCC/TM Annexure A and paragraph 750 of the IAL Annexure A.

757. In reply to paragraph 53A.17 of the BCC/TM Annexure A and paragraph 751 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 754, 755 and 756 above; and

(b) does not know and therefore cannot admit the paragraph.

758. White Oak does not know and therefore cannot admit paragraph 53A.18 of the BCC/TM Annexure A and paragraph 752 of the IAL Annexure A.

Renewal – 2019 Policy

759. White Oak does not know and therefore cannot admit paragraph 53A.19 of the BCC/TM Annexure A and paragraph 753 of the IAL Annexure A.

760. White Oak does not know and therefore cannot admit paragraph 53A.20 of the BCC/TM Annexure A and paragraph 754 of the IAL Annexure A.

Increase in facility size from USD400 million to USD430 million

761. White Oak does not know and therefore cannot admit paragraph 53A.21 of the BCC/TM Annexure A and paragraph 755 of the IAL Annexure A.

762. White Oak does not know and therefore cannot admit paragraph 53A.22 of the BCC/TM Annexure A and paragraph 756 of the IAL Annexure A.

763. White Oak does not know and therefore cannot admit paragraph 53A.23 of the BCC/TM Annexure A and paragraph 757 of the IAL Annexure A.

764. White Oak does not know and therefore cannot admit paragraph 53A.24 of the BCC/TM Annexure A and paragraph 758 of the IAL Annexure A.

765. White Oak does not know and therefore cannot admit paragraph 53A.25 of the BCC/TM Annexure A and paragraph 759 of the IAL Annexure A.

Increase in facility size from USD430 million to USD500 million in May 2019

766. White Oak does not know and therefore cannot admit paragraph 53A.26 of the BCC/TM Annexure A and paragraph 760 of the IAL Annexure A.

767. White Oak does not know and therefore cannot admit paragraph 53A.27 of the BCC/TM Annexure A and paragraph 761 of the IAL Annexure A.

768. White Oak does not know and therefore cannot admit paragraph 53A.28 of the BCC/TM Annexure A and paragraph 762 of the IAL Annexure A.

769. White Oak does not know and therefore cannot admit paragraph 53A.29 of the BCC/TM Annexure A and paragraph 763 of the IAL Annexure A.

770. In reply to paragraph 53A.30 of the BCC/TM Annexure A and paragraph 764 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 766, 767 and 769 above; and

(b) does not know and therefore cannot admit the paragraph.

771. White Oak does not know and therefore cannot admit paragraph 53A.31 of the BCC/TM Annexure A and paragraph 765 of the IAL Annexure A.

Increase in facility size from USD500 million to USD730 million in June 2019

772. White Oak does not know and therefore cannot admit paragraph 53A.32 of the BCC/TM Annexure A and paragraph 766 of the IAL Annexure A.

773. White Oak does not know and therefore cannot admit paragraph 53A.33 of the BCC/TM Annexure A and paragraph 767 of the IAL Annexure A.

774. In reply to paragraph 53A.34 of the BCC/TM Annexure A and paragraph 768 of the IAL Annexure A, White Oak:

(a) repeats paragraph 772; and

(b) does not know and therefore cannot admit the paragraph.

775. White Oak does not know and therefore cannot admit paragraph 53A.36 of the BCC/TM Annexure A and paragraph 769 of the IAL Annexure A.

776. In reply to paragraph 53A.37 of the BCC/TM Annexure A and paragraph 770 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 772, 774 and 775 above; and

(b) does not know and therefore cannot admit the paragraph.

777. White Oak does not know and therefore cannot admit paragraph 53A.38 of the BCC/TM Annexure A and paragraph 771 of the IAL Annexure A.

Purported Amendments to Customer Limits in September 2019

778. White Oak does not know and therefore cannot admit paragraph 53A.39 of the BCC/TM Annexure A and paragraph 772 of the IAL Annexure A.

779. White Oak does not know and therefore cannot admit paragraph 53A.40 of the BCC/TM Annexure A and paragraph 773 of the IAL Annexure A.

780. In reply to paragraph 53A.41 of the BCC/TM Annexure A and paragraph 774 of the IAL Annexure A, White Oak:

(a) repeats paragraph 778 above; and

(b) does not know and therefore cannot admit the paragraph.

781. White Oak does not know and therefore cannot admit paragraph 53A.42 of the BCC/TM Annexure A and paragraph 775 of the IAL Annexure A.

Increase of USD25 million from USD730 million to USD755 million

782. White Oak does not know and therefore cannot admit paragraph 53A.43 of the BCC/TM Annexure A and paragraph 776 of the IAL Annexure A.

783. White Oak does not know and therefore cannot admit paragraph 53A.44 of the BCC/TM Annexure A and paragraph 777 of the IAL Annexure A.

784. In reply to paragraph 53A.45 of the BCC/TM Annexure A and paragraph 778 of the IAL Annexure A, White Oak:

(a) repeats paragraph 782 above; and

(b) does not know and therefore cannot admit the paragraph.

785. White Oak does not know and therefore cannot admit paragraph 53A.46 of the BCC/TM Annexure A and paragraph 779 of the IAL Annexure A.

Increase of USD20 million from USD755 million to USD775 million

786. White Oak does not know and therefore cannot admit paragraph 53A.47 of the BCC/TM Annexure A and paragraph 780 of the IAL Annexure A.

787. In reply to paragraph 53A.48 of the BCC/TM Annexure A and paragraph 781 of the IAL Annexure A, White Oak:

(a) repeats paragraph 786; and

(b) does not know and therefore cannot admit the paragraph.

788. White Oak does not know and therefore cannot admit paragraph 53A.49 of the BCC/TM Annexure A and paragraph 782 of the IAL Annexure A.

789. White Oak does not know and therefore cannot admit paragraph 53A.50 of the BCC/TM Annexure A and paragraph 783 of the IAL Annexure A.

790. In reply to paragraph 53A.51 of the BCC/TM Annexure A and paragraph 784 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 787 and 789 above; and

(b) does not know and therefore cannot admit the paragraph.

791. White Oak does not know and therefore cannot admit paragraph 53A.52 of the BCC/TM Annexure A and paragraph 785 of the IAL Annexure A.

Representations were misleading

792. White Oak does not know and therefore cannot admit paragraph 53A.53 of the BCC/TM Annexure A and paragraph 786 of the IAL Annexure A.

793. White Oak does not know and therefore cannot admit paragraph 53A.54 of the BCC/TM Annexure A and paragraph 787 of the IAL Annexure A.

794. White Oak does not know and therefore cannot admit paragraph 53A.55 of the BCC/TM Annexure A and paragraph 788 of the IAL Annexure A.

Knowledge of falsity of representations

795. White Oak does not know and therefore cannot admit paragraph 53A.56 of the BCC/TM Annexure A and paragraph 789 of the IAL Annexure A.

796. White Oak does not know and therefore cannot admit paragraph 53A.57 of the BCC/TM Annexure A and paragraph 790 of the IAL Annexure A.

797. White Oak does not know and therefore cannot admit paragraph 53A.58 of the BCC/TM Annexure A and paragraph 791 of the IAL Annexure A.

798. In reply to paragraph 53A.59 of the BCC/TM Annexure A and paragraph 792 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

799. In reply to paragraph 53A.60 of the BCC/TM Annexure A and paragraph 793 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

800. White Oak does not know and therefore cannot admit paragraph 53A.61 of the BCC/TM Annexure A and paragraph 794 of the IAL Annexure A.

801. In reply to paragraph 53A.62 of the BCC/TM Annexure A and paragraph 795 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

802. In reply to paragraph 53A.63 of the BCC/TM Annexure A and paragraph 796 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of the materiality of representations

803. White Oak does not know and therefore cannot admit paragraph 53A.64 of the BCC/TM Annexure A and paragraphs 797 and 798 of the IAL Annexure A.

804. White Oak does not know and therefore cannot admit paragraph 53A.65 of the BCC/TM Annexure A and paragraph 799 of the IAL Annexure A.

805. In reply to paragraph 53A.65A of the BCC/TM Annexure A and paragraph 800 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

806. White Oak does not know and therefore cannot admit paragraph 53A.65B of the BCC/TM Annexure A and paragraph 801 of the IAL Annexure A.

807. In reply to paragraph 53A.66 of the BCC/TM Annexure A and paragraph 802 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

808. White Oak does not know and therefore cannot admit paragraph 53A.67 of the BCC/TM Annexure A and paragraph 803 of the IAL Annexure A.

809. White Oak does not know and therefore cannot admit paragraph 53A.67A of the BCC/TM Annexure A and paragraph 804 of the IAL Annexure A.

810. In reply to paragraph 53A.68 of the BCC/TM Annexure A and paragraph 805 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

811. In reply to paragraph 53A.69 of the BCC/TM Annexure A and paragraph 806 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

812. In reply to paragraph 53A.70 of the BCC/TM Annexure A and paragraph 807 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 795, 798, 799, 800, 801, 802, 803, 805, 807, 808, 810 and 811 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

813. In reply to paragraph 53A.71 of the BCC/TM Annexure A and paragraph 808 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 796, 798, 799, 800, 801, 802, 803, 805, 807, 808, 810 and 811; and

(b) otherwise does not know and therefore cannot admit the paragraph.

814. In reply to paragraph 53A.72 of the BCC/TM Annexure A and paragraph 809 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 797, 798, 799, 800, 801, 802, 803, 805, 807, 808, 810 and 811; and

(b) otherwise does not know and therefore cannot admit the paragraph.

815. White Oak does not know and therefore cannot admit paragraph 53A.73 of the BCC/TM Annexure A and paragraph 810 of the IAL Annexure A.

816. White Oak does not know and therefore cannot admit paragraph 53A.74 of the BCC/TM Annexure A and paragraph 811 of the IAL Annexure A.

817. White Oak does not know and therefore cannot admit paragraph 53A.75 of the BCC/TM Annexure A and paragraph 812 of the IAL Annexure A.

818. In reply to paragraph 53A.76 of the BCC/TM Annexure A and paragraph 813 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 812 to 815 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

819. In reply to paragraph 53A.77 of the BCC/TM Annexure A and paragraph 814 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 792, 793, 794, 815, 816 and 817 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D10.10 Bluestone Multi-Obligor Non-Disclosures

Knowledge of underlying matters

820. White Oak does not know and therefore cannot admit paragraph 53A.78 of the BCC/TM Annexure A and paragraph 815 of the IAL Annexure A.

821. In reply to paragraph 53A.79 of the BCC/TM Annexure A and paragraph 816 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

822. In reply to paragraph 53A.80 of the BCC/TM Annexure A and paragraph 817 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

823. White Oak does not know and therefore cannot admit paragraph 53A.81 of the BCC/TM Annexure A and paragraph 818 of the IAL Annexure A.

824. In reply to paragraph 53A.82 of the BCC/TM Annexure A and paragraph 819 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

825. In reply to paragraph 53A.83 of the BCC/TM Annexure A and paragraph 820 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

826. White Oak does not know and therefore cannot admit paragraph 53A.84 of the BCC/TM Annexure A and paragraph 821 of the IAL Annexure A.

827. In reply to paragraph 53A.85 of the BCC/TM Annexure A and paragraph 822 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

828. White Oak does not know and therefore cannot admit paragraph 53A.86 of the BCC/TM Annexure A and paragraph 823 of the IAL Annexure A.

829. White Oak does not know and therefore cannot admit paragraph 53A.87 of the BCC/TM Annexure A and paragraph 824 of the IAL Annexure A.

830. In reply to paragraph 53A.88 of the BCC/TM Annexure A and paragraph 825 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

831. In reply to paragraph 53A.89 of the BCC/TM Annexure A and paragraph 826 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

832. White Oak does not know and therefore cannot admit paragraph 53A.90 of the BCC/TM Annexure A and paragraph 827 of the IAL Annexure A.

833. White Oak does not know and therefore cannot admit paragraph 53A.91 of the BCC/TM Annexure A and paragraph 828 of the IAL Annexure A.

834. In reply to paragraph 53A.92 of the BCC/TM Annexure A and paragraph 829 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

835. In reply to paragraph 53A.93 of the BCC/TM Annexure A and paragraph 830 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

836. White Oak does not know and therefore cannot admit paragraph 53A.94 of the BCC/TM Annexure A and paragraph 831 of the IAL Annexure A.

837. White Oak does not know and therefore cannot admit paragraph 53A.95 of the BCC/TM Annexure A and paragraph 832 of the IAL Annexure A.

838. In reply to paragraph 53A.96 of the BCC/TM Annexure A and paragraph 833 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

839. White Oak does not know and therefore cannot admit paragraph 53A.97 of the BCC/TM Annexure A and paragraph 834 of the IAL Annexure A.

840. In reply to paragraph 53A.98 of the BCC/TM Annexure A and paragraph 835 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 821 to 838 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

841. In reply to paragraph 53A.99 of the BCC/TM Annexure A and paragraph 836 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 821, 822, 823, 824, 825, 826, 827, 828, 830, 831, 832, 834, 835, 836 and 838 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

842. White Oak does not know and therefore cannot admit paragraph 53A.100 of the BCC/TM Annexure A and paragraph 837 of the IAL Annexure A.

843. White Oak does not know and therefore cannot admit paragraph 53A.101 of the BCC/TM Annexure A and paragraph 838 of the IAL Annexure A.

844. In reply to paragraph 53A.102 of the BCC/TM Annexure A and paragraph 839 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 841 and 843 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

845. In reply to paragraph 53A.103 of the BCC/TM Annexure A and paragraph 840 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 839, 840, 842 and 843 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D10.A BLUESTONE SINGLE OBLIGOR

D10A.1 Policy and Endorsements

846. In reply to paragraph 53A.104 of the BCC/TM Annexure A and paragraph 841 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 126(c) and 289 of the CS 5ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D10A.2 Bluestone Single-Obligor Misrepresentations

847. White Oak does not know and therefore cannot admit paragraph 53A.105 of the BCC/TM Annexure A and paragraph 842 of the IAL Annexure A.

848. In reply to paragraph 53A.106 of the BCC/TM Annexure A and paragraph 843 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 41 and 42 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Bluestone SCF Facility Misrepresentations / Invoices Misrepresentations

849. White Oak does not know and therefore cannot admit paragraph 53A.107 of the BCC/TM Annexure A and paragraph 844 of the IAL Annexure A.

850. In reply to paragraph 53A.108 of the BCC/TM Annexure A and paragraph 845 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 847 to 849 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

851. In reply to paragraph 53A.109 of the BCC/TM Annexure A and paragraph 846 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 30, 32, 33, 36, 39 and 40; and

(b) otherwise does not know and therefore cannot admit the paragraph.

852. White Oak does not know and therefore cannot admit paragraph 53A.110 of the BCC/TM Annexure A and paragraph 847 of the IAL Annexure A.

853. White Oak does not know and therefore cannot admit paragraph 53A.111 of the BCC/TM Annexure A and paragraph 848 of the IAL Annexure A.

854. White Oak does not know and therefore cannot admit paragraph 53A.112 of the BCC/TM Annexure A and paragraph 849 of the IAL Annexure A.

855. White Oak does not know and therefore cannot admit paragraph 53A.113 of the BCC/TM Annexure A and paragraph 850 of the IAL Annexure A.

856. White Oak does not know and therefore cannot admit paragraph 53A.114 of the BCC/TM Annexure A and paragraph 851 of the IAL Annexure A.

Representations were misleading

857. White Oak does not know and therefore cannot admit paragraph 53A.115 of the BCC/TM Annexure A and paragraph 852 of the IAL Annexure A.

858. White Oak does not know and therefore cannot admit paragraph 53A.116 of the BCC/TM Annexure A and paragraph 853 of the IAL Annexure A.

Knowledge of falsity of representations

859. White Oak does not know and therefore cannot admit paragraph 53A.117 of the BCC/TM Annexure A and paragraph 854 of the IAL Annexure A.

860. In reply to paragraph 53A.118 of the BCC/TM Annexure A and paragraph 855 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

861. In reply to paragraph 53A.119 of the BCC/TM Annexure A and paragraph 856 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

862. White Oak does not know and therefore cannot admit paragraph 53A.120 of the BCC/TM Annexure A and paragraph 857 of the IAL Annexure A.

863. In reply to paragraph 53A.121 of the BCC/TM Annexure A and paragraph 858 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

864. In reply to paragraph 53A.122 of the BCC/TM Annexure A and paragraph 859 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

865. White Oak does not know and therefore cannot admit paragraph 53A.123 of the BCC/TM Annexure A and paragraph 860 of the IAL Annexure A.

866. In reply to paragraph 53A.124 of the BCC/TM Annexure A and paragraph 861 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

867. In reply to paragraph 53A.125 of the BCC/TM Annexure A and paragraph 862 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of the materiality of the representations

868. White Oak does not know and therefore cannot admit paragraph 53A.126 of the BCC/TM Annexure A and paragraph 863 of the IAL Annexure A.

869. White Oak does not know and therefore cannot admit paragraph 53A.126A of the BCC/TM Annexure A and paragraph 864 of the IAL Annexure A.

870. In reply to paragraph 53A.127 of the BCC/TM Annexure A and paragraph 865 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

871. In reply to paragraph 53A.128 of the BCC/TM Annexure A and paragraph 866 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

872. White Oak does not know and therefore cannot admit paragraph 53A.129 of the BCC/TM Annexure A and paragraph 867 of the IAL Annexure A.

873. White Oak does not know and therefore cannot admit paragraph 53A.129A of the BCC/TM Annexure A and paragraph 868 of the IAL Annexure A.

874. In reply to paragraph 53A.130 of the BCC/TM Annexure A and paragraph 869 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

875. In reply to paragraph 53A.131 of the BCC/TM Annexure A and paragraph 870 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

876. White Oak does not know and therefore cannot admit paragraph 53A.132 of the BCC/TM Annexure A and paragraph 871 of the IAL Annexure A.

877. White Oak does not know and therefore cannot admit paragraph 53A.132A of the BCC/TM Annexure A and paragraph 872 of the IAL Annexure A.

878. In reply to paragraph 53A.133 of the BCC/TM Annexure A and paragraph 873 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above~~say that there is no paragraphs 21 and 22 in Annexure A~~; and

(b) otherwise does not know and therefore cannot admit the paragraph

879. In reply to paragraph 53A.134 of the BCC/TM Annexure A and paragraph 874 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

880. In reply to paragraph 53A.135 of the BCC/TM Annexure A and paragraph 875 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 859 to 864 and 868 to 875 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

881. In reply to paragraph 53A.136 of the BCC/TM Annexure A and paragraph 876 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 865, 866, 867, 876, 878 and 879 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

882. White Oak does not know and therefore cannot admit paragraph 53A.137 of the BCC/TM Annexure A and paragraph 877 of the IAL Annexure A.

883. White Oak does not know and therefore cannot admit paragraph 53A.138 of the BCC/TM Annexure A and paragraph 878 of the IAL Annexure A.

884. In reply to paragraph 53A.139 of the BCC/TM Annexure A and paragraph 879 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 882 to 883 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

885. In reply to paragraph 53A.140 of the BCC/TM Annexure A and paragraph 880 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 857, 858, 882 and 883 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D10A.3 Bluestone Single Obligor Non-Disclosures

Knowledge of underlying matters

886. White Oak does not know and therefore cannot admit paragraph 53A.141 of the BCC/TM Annexure A and paragraph 881 of the IAL Annexure A.

887. In reply to paragraph 53A.142 of the BCC/TM Annexure A and paragraph 882 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

888. In reply to paragraph 53A.143 of the BCC/TM Annexure A and paragraph 883 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

889. White Oak does not know and therefore cannot admit paragraph 53A.144 of the BCC/TM Annexure A and paragraph 884 of the IAL Annexure A.

890. In reply to paragraph 53A.145 of the BCC/TM Annexure A and paragraph 885 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

891. In reply to paragraph 53A.146 of the BCC/TM Annexure A and paragraph 886 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

892. White Oak does not know and therefore cannot admit paragraph 53A.147 of the BCC/TM Annexure A and paragraph 887 of the IAL Annexure A.

893. In reply to paragraph 53A.148 of the BCC/TM Annexure A and paragraph 888 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

894. White Oak does not know and therefore cannot admit paragraph 53A.149 of the BCC/TM Annexure A and paragraph 889 of the IAL Annexure A.

895. In reply to paragraph 53A.150 of the BCC/TM Annexure A and paragraph 890 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

896. In reply to paragraph 53A.151 of the BCC/TM Annexure A and paragraph 891 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

897. White Oak does not know and therefore cannot admit paragraph 53A.152 of the BCC/TM Annexure A and paragraph 892 of the IAL Annexure A.

Knowledge of materiality

898. White Oak does not know and therefore cannot admit paragraph 53A.153 of the BCC/TM Annexure A and paragraph 893 of the IAL Annexure A.

899. White Oak does not know and therefore cannot admit paragraph 53A.154 of the BCC/TM Annexure A and paragraph 894 of the IAL Annexure A.

900. In reply to paragraph 53A.155 of the BCC/TM Annexure A and paragraph 895 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

901. In reply to paragraph 53A.156 of the BCC/TM Annexure A and paragraph 896 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

902. White Oak does not know and therefore cannot admit paragraph 53A.157 of the BCC/TM Annexure A and paragraph 897 of the IAL Annexure A.

903. White Oak does not know and therefore cannot admit paragraph 53A.158 of the BCC/TM Annexure A and paragraph 898 of the IAL Annexure A.

904. In reply to paragraph 53A.159 of the BCC/TM Annexure A and paragraph 899 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

905. In reply to paragraph 53A.160 of the BCC/TM Annexure A and paragraph 900 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

906. White Oak does not know and therefore cannot admit paragraph 53A.161 of the BCC/TM Annexure A and paragraph 901 of the IAL Annexure A.

907. White Oak does not know and therefore cannot admit paragraph 53A.162 of the BCC/TM Annexure A and paragraph 902 of the IAL Annexure A.

908. In reply to paragraph 53A.163 of the BCC/TM Annexure A and paragraph 903 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Invoices misrepresentation

909. White Oak does not know and therefore cannot admit paragraph 53A.164 of the BCC/TM Annexure A and paragraph 904 of the IAL Annexure A.

910. White Oak does not know and therefore cannot admit paragraph 53A.165 of the BCC/TM Annexure A and paragraph 905 of the IAL Annexure A.

911. In reply to paragraph 53A.166 of the BCC/TM Annexure A and paragraph 906 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

912. In reply to paragraph 53A.167 of the BCC/TM Annexure A and paragraph 907 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 31, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

913. White Oak does not know and therefore cannot admit paragraph 53A.168 of the BCC/TM Annexure A and paragraph 908 of the IAL Annexure A.

914. In reply to paragraph 53A.169 of the BCC/TM Annexure A and paragraph 909 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 898 to 913 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

915. In reply to paragraph 53A.170 of the BCC/TM Annexure A and paragraph 910 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 898, 900, 901, 902, 904, 905, 906, 908, 909, 911 and 912 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

916. White Oak does not know and therefore cannot admit paragraph 53A.171 of the BCC/TM Annexure A and paragraph 911 of the IAL Annexure A.

917. White Oak does not know and therefore cannot admit paragraph 53A.172 of the BCC/TM Annexure A and paragraph 912 of the IAL Annexure A.

918. In reply to paragraph 53A.173 of the BCC/TM Annexure A and paragraph 913 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 915 and 917 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

919. In reply to paragraph 53A.174 of the BCC/TM Annexure A and paragraph 914 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 913, 914, 916 and 917 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D11 CATFOSS: CATFOSS GROUP AND CATFOSS RENEWABLES

D11.5 Catfoss Group

D11.5A Policy and Endorsements

920. In reply to paragraph 75.1 of the BCC/TM Annexure A and paragraph 915 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 30, 36, 38 and 41 of the Fourth Amended Statement of Claim filed in Federal Court of Australia proceedings numbered NSD106/2022;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

921. In reply to paragraph 75.2 of the BCC/TM Annexure A and paragraph 916 of the IAL Annexure A, White Oak:

(a) refers to paragraph 325 of the CS 5ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

922. In reply to paragraph 75.3 of the BCC/TM Annexure A and paragraph 917 of the IAL Annexure A, White Oak:

(a) says that it does not make any allegation as pleaded; and

(b) otherwise does not know and therefore cannot admit the paragraph.

923. In reply to paragraph 75.4 of the BCC/TM Annexure A and paragraph 918 of the IAL Annexure A, White Oak:

(a) refers to paragraphs 555, 556 and 557 of the CS 5ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

D11.5B Catfoss Group

924. White Oak does not know and therefore cannot admit paragraph 75.5 of the BCC/TM Annexure A and paragraph 919 of the IAL Annexure A.

925. White Oak does not know and therefore cannot admit paragraph 75.6 of the BCC/TM Annexure A and paragraph 920 of the IAL Annexure A.

926. White Oak does not know and therefore cannot admit paragraph 75.7 of the BCC/TM Annexure A and paragraph 921 of the IAL Annexure A.

927. White Oak does not know and therefore cannot admit paragraph 75.8 of the BCC/TM Annexure A and paragraph 922 of the IAL Annexure A.

D11.5C Catfoss/Noviniti Side Deals

928. White Oak does not know and therefore cannot admit paragraph 75.9 of the BCC/TM Annexure A and paragraph 923 of the IAL Annexure A.

929. White Oak does not know and therefore cannot admit paragraph 75.10 of the BCC/TM Annexure A and paragraph 924 of the IAL Annexure A.

930. White Oak does not know and therefore cannot admit paragraph 75.11 of the BCC/TM Annexure A and paragraph 925 of the IAL Annexure A.

931. White Oak does not know and therefore cannot admit paragraph 75.12 of the BCC/TM Annexure A and paragraph 926 of the IAL Annexure A.

932. White Oak does not know and therefore cannot admit paragraph 75.13 of the BCC/TM Annexure A and paragraph 927 of the IAL Annexure A.

D11.5D Catfoss Group Non-Disclosures

933. White Oak does not know and therefore cannot admit paragraph 75.14 of the BCC/TM Annexure A and paragraph 928 of the IAL Annexure A.

934. White Oak does not know and therefore cannot admit paragraph 75.15 of the BCC/TM Annexure A and paragraph 929 of the IAL Annexure A.

935. White Oak does not know and therefore cannot admit paragraph 75.16 of the BCC/TM Annexure A and paragraph 930 of the IAL Annexure A.

D11.6 Catfoss Renewables

D11.6A Catfoss Renewables Misrepresentations

Inception representations

936. White Oak does not know and therefore cannot admit paragraph 75.17 of the BCC/TM Annexure A and paragraph 931 of the IAL Annexure A.

937. White Oak does not know and therefore cannot admit paragraph 75.18 of the BCC/TM Annexure A and paragraph 932 of the IAL Annexure A.

938. In reply to paragraph 75.19 of the BCC/TM Annexure A and paragraph 933 of the IAL Annexure A, White Oak:

(a) repeats paragraph 936 above; and

(b) does not know and therefore cannot admit the paragraph.

939. In reply to paragraph 75.20 of the BCC/TM Annexure A and paragraph 934 of the IAL Annexure A, White Oak

(a) repeats paragraph 938 above; and

(b) does not know and therefore cannot admit the paragraph.

940. In reply to paragraph 75.21 of the BCC/TM Annexure A and paragraph 935 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

941. White Oak does not know and therefore cannot admit paragraph 75.22 of the BCC/TM Annexure A and paragraph 936 of the IAL Annexure A.

942. White Oak does not know and therefore cannot admit paragraph 75.23 of the BCC/TM Annexure A and paragraph 937 of the IAL Annexure A.

Renewal

943. White Oak does not know and therefore cannot admit paragraph 75.24 of the BCC/TM Annexure A and paragraph 938 of the IAL Annexure A.

944. White Oak does not know and therefore cannot admit paragraph 75.25 of the BCC/TM Annexure A and paragraph 939 of the IAL Annexure A.

945. White Oak does not know and therefore cannot admit paragraph 75.26 of the BCC/TM Annexure A and paragraph 940 of the IAL Annexure A.

946. White Oak does not know and therefore cannot admit paragraph 75.27 of the BCC/TM Annexure A and paragraph 941 of the IAL Annexure A.

Representations were misleading

947. White Oak does not know and therefore cannot admit paragraph 75.28 of the BCC/TM Annexure A and paragraph 942 of the IAL Annexure A.

Knowledge of falsity of representations

948. White Oak does not know and therefore cannot admit paragraph 75.29 of the BCC/TM Annexure A and paragraph 943 of the IAL Annexure A.

949. In reply to paragraph 75.30 of the BCC/TM Annexure A and paragraph 944 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

950. In reply to paragraph 75.31 of the BCC/TM Annexure A and paragraph 945 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

951. White Oak does not know and therefore cannot admit paragraph 75.32 of the BCC/TM Annexure A and paragraph 946 of the IAL Annexure A.

952. In reply to paragraph 75.33 of the BCC/TM Annexure A and paragraph 947 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

953. In reply to paragraph 75.34 of the BCC/TM Annexure A and paragraph 948 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

954. White Oak does not know and therefore cannot admit paragraph 75.35 of the BCC/TM Annexure A and paragraph 949 of the IAL Annexure A.

955. White Oak does not know and therefore cannot admit paragraph 75.36 of the BCC/TM Annexure A and paragraph 950 of the IAL Annexure A.

956. In reply to paragraph 75.37 of the BCC/TM Annexure A and paragraph 951 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

957. In reply to paragraph 75.38 of the BCC/TM Annexure A and paragraph 952 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

958. White Oak does not know and therefore cannot admit paragraph 75.39 of the BCC/TM Annexure A and paragraph 953 of the IAL Annexure A.

959. White Oak does not know and therefore cannot admit paragraph 75.40 of the BCC/TM Annexure A and paragraph 954 of the IAL Annexure A.

960. In reply to paragraph 75.41 of the BCC/TM Annexure A and paragraph 955 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

961. In reply to paragraph 75.42 of the BCC/TM Annexure A and paragraph 956 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

962. In reply to paragraph 75.43 of the BCC/TM Annexure A and paragraph 957 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 948 to 954, 956, 957, 958, 960 and 961 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

963. White Oak does not know and therefore cannot admit paragraph 75.44 of the BCC/TM Annexure A and paragraph 958 of the IAL Annexure A.

964. In reply to paragraph 75.45 of the BCC/TM Annexure A and paragraph 959 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 947 to 963 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

965. In reply to paragraph 75.46 of the BCC/TM Annexure A and paragraph 960 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 947 and 963 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D11.6B Catfoss Renewables Non-Disclosures

Knowledge of underlying matters

966. White Oak does not know and therefore cannot admit paragraph 75.47 of the BCC/TM Annexure A and paragraph 961 of the IAL Annexure A.

967. White Oak does not know and therefore cannot admit paragraph 75.48 of the BCC/TM Annexure A and paragraph 962 of the IAL Annexure A.

968. In reply to paragraph 75.49 of the BCC/TM Annexure A and paragraph 963 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

969. In reply to paragraph 75.50 of the BCC/TM Annexure A and paragraph 964 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

970. White Oak does not know and therefore cannot admit paragraph 75.51 of the BCC/TM Annexure A and paragraph 965 of the IAL Annexure A.

971. White Oak does not know and therefore cannot admit paragraph 75.52 of the BCC/TM Annexure A and paragraph 966 of the IAL Annexure A.

972. White Oak does not know and therefore cannot admit paragraph 75.53 of the BCC/TM Annexure A and paragraph 967 of the IAL Annexure A.

973. In reply to paragraph 75.54 of the BCC/TM Annexure A and paragraph 968 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

974. White Oak does not know and therefore cannot admit paragraph 75.55 of the BCC/TM Annexure A and paragraph 969 of the IAL Annexure A.

975. In reply to paragraph 75.56 of the BCC/TM Annexure A and paragraph 970 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

976. In reply to paragraph 75.57 of the BCC/TM Annexure A and paragraph 971 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

977. White Oak does not know and therefore cannot admit paragraph 75.58 of the BCC/TM Annexure A and paragraph 972 of the IAL Annexure A.

978. In reply to paragraph 75.59 of the BCC/TM Annexure A and paragraph 973 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

979. In reply to paragraph 75.60 of the BCC/TM Annexure A and paragraph 974 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

980. White Oak does not know and therefore cannot admit paragraph 75.61 of the BCC/TM Annexure A and paragraph 975 of the IAL Annexure A.

981. White Oak does not know and therefore cannot admit paragraph 75.62 of the BCC/TM Annexure A and paragraph 976 of the IAL Annexure A.

982. In reply to paragraph 75.63 of the BCC/TM Annexure A and paragraph 977 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

983. In reply to paragraph 75.64 of the BCC/TM Annexure A and paragraph 978 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

984. White Oak does not know and therefore cannot admit paragraph 75.65 of the BCC/TM Annexure A and paragraph 979 of the IAL Annexure A.

985. White Oak does not know and therefore cannot admit paragraph 75.66 of the BCC/TM Annexure A and paragraph 980 of the IAL Annexure A.

986. In reply to paragraph 75.67 of the BCC/TM Annexure A and paragraph 981 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

987. White Oak does not know and therefore cannot admit paragraph 75.68 of the BCC/TM Annexure A and paragraph 982 of the IAL Annexure A.

988. White Oak does not know and therefore cannot admit paragraph 75.69 of the BCC/TM Annexure A and paragraph 983 of the IAL Annexure A.

989. In reply to paragraph 75.70 of the BCC/TM Annexure A and paragraph 984 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

990. In reply to paragraph 75.71 of the BCC/TM Annexure A and paragraph 985 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

991. White Oak does not know and therefore cannot admit paragraph 75.72 of the BCC/TM Annexure A and paragraph 986 of the IAL Annexure A.

992. In reply to paragraph 75.73 of the BCC/TM Annexure A and paragraph 987 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 968 to 976 and 980 to 990 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

993. In reply to paragraph 75.74 of the BCC/TM Annexure A and paragraph 988 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 980, 982 and 983 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

994. White Oak does not know and therefore cannot admit paragraph 75.75 of the BCC/TM Annexure A and paragraph 989 of the IAL Annexure A.

995. White Oak does not know and therefore cannot admit paragraph 75.76 of the BCC/TM Annexure A and paragraph 990 of the IAL Annexure A.

996. In reply to paragraph 75.77 of the BCC/TM Annexure A and paragraph 991 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 993 to 995 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

997. In reply to paragraph 75.78 of the BCC/TM Annexure A and paragraph 992 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 994 and 995 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D12 CATFOSS: NOVINITI POOLE, CATFOSS DBT and NOVINITI COLCHESTER

D12.7 Catfoss/Noviniti NHS Project Misrepresentations

Representations

998. White Oak does not know and therefore cannot admit paragraph 75AB.1 of the BCC/TM Annexure A and paragraph 993 of the IAL Annexure A.

999. White Oak does not know and therefore cannot admit paragraph 75AB.2 of the BCC/TM Annexure A and paragraph 994 of the IAL Annexure A.

1000. White Oak does not know and therefore cannot admit paragraph 75AB.3 of the BCC/TM Annexure A and paragraph 995 of the IAL Annexure A.

1001. In reply to paragraph 75AB.4 of the BCC/TM Annexure A and paragraphs 996 and 997 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 998 to 1000; and

(b) does not know and therefore cannot admit the paragraph.

1002. White Oak does not know and therefore cannot admit paragraph 75AB.5 of the BCC/TM Annexure A and paragraph 998 of the IAL Annexure A.

1003. In reply to paragraph 75AB.6 of the BCC/TM Annexure A and paragraph 999 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 27, 28, 32, 33, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1004. White Oak does not know and therefore cannot admit paragraph 75AB.7 of the BCC/TM Annexure A and paragraph 1000 of the IAL Annexure A.

1005. White Oak does not know and therefore cannot admit paragraph 75AB.8 of the BCC/TM Annexure A and paragraph 1001 of the IAL Annexure A.

1006. White Oak does not know and therefore cannot admit paragraph 75AB.9 of the BCC/TM Annexure A and paragraph 1002 of the IAL Annexure A.

1007. White Oak does not know and therefore cannot admit paragraph 75AB.10 of the BCC/TM Annexure A and paragraph 1003 of the IAL Annexure A.

1008. White Oak does not know and therefore cannot admit paragraph 75AB.11 of the BCC/TM Annexure A and paragraph 1004 of the IAL Annexure A.

1009. White Oak does not know and therefore cannot admit paragraph 75AB.12 of the BCC/TM Annexure A and paragraph 1005 of the IAL Annexure A.

1010. White Oak does not know and therefore cannot admit paragraph 75AB.13 of the BCC/TM Annexure A and paragraph 1006 of the IAL Annexure A.

1011. White Oak does not know and therefore cannot admit paragraph 75AB.14 of the BCC/TM Annexure A and paragraph 1007 of the IAL Annexure A.

1012. White Oak does not know and therefore cannot admit paragraph 75AB.15 of the BCC/TM Annexure A and paragraph 1008 of the IAL Annexure A.

1013. White Oak does not know and therefore cannot admit paragraph 75AB.16 of the BCC/TM Annexure A and paragraph 1009 of the IAL Annexure A.

1014. White Oak does not know and therefore cannot admit paragraph 75AB.17 of the BCC/TM Annexure A and paragraph 1010 of the IAL Annexure A.

Representations were misleading

1015. White Oak does not know and therefore cannot admit paragraph 75AB.18 of the BCC/TM Annexure A and paragraph 1011 of the IAL Annexure A.

1016. White Oak does not know and therefore cannot admit paragraph 75AB.19 of the BCC/TM Annexure A and paragraph 1012 of the IAL Annexure A.

1017. White Oak does not know and therefore cannot admit paragraph 75AB.20 of the BCC/TM Annexure A and paragraph 1013 of the IAL Annexure A.

1018. White Oak does not know and therefore cannot admit paragraph 75AB.21 of the BCC/TM Annexure A and paragraph 1014 of the IAL Annexure A.

Knowledge of falsity of representations

1019. White Oak does not know and therefore cannot admit paragraph 75AB.22 of the BCC/TM Annexure A and paragraph 1015 of the IAL Annexure A.

1020. In reply to paragraph 75AB.23 of the BCC/TM Annexure A and paragraph 1016 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1021. In reply to paragraph 75AB.24 of the BCC/TM Annexure A and paragraph 1017 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1022. White Oak does not know and therefore cannot admit paragraph 75AB.25 of the BCC/TM Annexure A and paragraph 1018 of the IAL Annexure A.

1023. In reply to paragraph 75AB.26 of the BCC/TM Annexure A and paragraph 1019 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1024. In reply to paragraph 75AB.27 of the BCC/TM Annexure A and paragraph 1020 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality of representations

1025. White Oak does not know and therefore cannot admit paragraph 75AB.28 of the BCC/TM Annexure A and paragraph 1021 of the IAL Annexure A.

1026. White Oak does not know and therefore cannot admit paragraph 75AB.29 of the BCC/TM Annexure A and paragraph 1022 of the IAL Annexure A.

1027. In reply to paragraph 75AB.30 of the BCC/TM Annexure A and paragraph 1023 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1028. In reply to paragraph 75AB.31 of the BCC/TM Annexure A and paragraph 1024 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1029. White Oak does not know and therefore cannot admit paragraph 75AB.32 of the BCC/TM Annexure A and paragraph 1025 of the IAL Annexure A.

1030. White Oak does not know and therefore cannot admit paragraph 75AB.33 of the BCC/TM Annexure A and paragraph 1026 of the IAL Annexure A.

1031. In reply to paragraph 75AB.34 of the BCC/TM Annexure A and paragraph 1027 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1032. In reply to paragraph 75AB.35 of the BCC/TM Annexure A and paragraph 1028 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

1033. In reply to paragraph 75AB.36 of the BCC/TM Annexure A and paragraph 1029 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 998 to 1032 above; and

(b) does not know and therefore cannot admit the paragraph.

1034. White Oak does not know and therefore cannot admit paragraph 75AB.37 of the BCC/TM Annexure A and paragraph 1030 of the IAL Annexure A.

1035. In reply to paragraph 75AB.38 of the BCC/TM Annexure A and paragraph 1031 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1015 to 1018 above; and

(b) does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

1036. In reply to paragraph 75AB.39 of the BCC/TM Annexure A and paragraph 1032 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1015 to 1018, 1025 and 1029 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D12.8 Catfoss/Noviniti NHS Project Non-Disclosures

Knowledge of underlying matters

1037. White Oak does not know and therefore cannot admit paragraph 75AB.40 of the BCC/TM Annexure A and paragraph 1033 of the IAL Annexure A.

1038. White Oak does not know and therefore cannot admit paragraph 75AB.41 of the BCC/TM Annexure A and paragraph 1034 of the IAL Annexure A.

1039. White Oak does not know and therefore cannot admit paragraph 75AB.42 of the BCC/TM Annexure A and paragraph 1035 of the IAL Annexure A.

1040. White Oak does not know and therefore cannot admit paragraph 75AB.43 of the BCC/TM Annexure A and paragraph 1036 of the IAL Annexure A.

1041. In reply to paragraph 75AB.44 of the BCC/TM Annexure A and paragraph 1037 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1042. In reply to paragraph 75AB.45 of the BCC/TM Annexure A and paragraph 1038 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1043. White Oak does not know and therefore cannot admit paragraph 75AB.46 of the BCC/TM Annexure A and paragraph 1039 of the IAL Annexure A.

1044. In reply to paragraph 75AB.47 of the BCC/TM Annexure A and paragraph 1040 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1045. White Oak does not know and therefore cannot admit paragraph 75AB.48 of the BCC/TM Annexure A and paragraph 1041 of the IAL Annexure A.

1046. In reply to paragraph 75AB.49 of the BCC/TM Annexure A and paragraph 1042 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1047. White Oak does not know and therefore cannot admit paragraph 75AB.50 of the BCC/TM Annexure A and paragraph 1043 of the IAL Annexure A.

1048. In reply to paragraph 75AB.51 of the BCC/TM Annexure A and paragraph 1044 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1049. In reply to paragraph 75AB.52 of the BCC/TM Annexure A and paragraph 1045 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Knowledge of materiality

1050. White Oak does not know and therefore cannot admit paragraph 75AB.53 of the BCC/TM Annexure A and paragraph 1046 of the IAL Annexure A.

1051. White Oak does not know and therefore cannot admit paragraph 75AB.54 of the BCC/TM Annexure A and paragraph 1047 of the IAL Annexure A.

1052. In reply to paragraph 75AB.55 of the BCC/TM Annexure A and paragraph 1048 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1053. In reply to paragraph 75AB.56 of the BCC/TM Annexure A and paragraph 1049 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1054. White Oak does not know and therefore cannot admit paragraph 75AB.57 of the BCC/TM Annexure A and paragraph 1050 of the IAL Annexure A.

1055. White Oak does not know and therefore cannot admit paragraph 75AB.58 of the BCC/TM Annexure A and paragraph 1051 of the IAL Annexure A.

1056. In reply to paragraph 75AB.59 of the BCC/TM Annexure A and paragraph 1052 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1057. White Oak does not know and therefore cannot admit paragraph 75AB.60 of the BCC/TM Annexure A and paragraph 1053 of the IAL Annexure A.

1058. White Oak does not know and therefore cannot admit paragraph 75AB.61 of the BCC/TM Annexure A and paragraph 1054 of the IAL Annexure A.

1059. In reply to paragraph 75AB.62 of the BCC/TM Annexure A and paragraph 1055 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1060. In reply to paragraph 75AB.63 of the BCC/TM Annexure A and paragraph 1056 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

1061. White Oak does not know and therefore cannot admit paragraph 75AB.64 of the BCC/TM Annexure A and paragraph 1057 of the IAL Annexure A.

1062. In reply to paragraph 75AB.65 of the BCC/TM Annexure A and paragraph 1058 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1037 to 1060 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

1063. In reply to paragraph 75AB.66 of the BCC/TM Annexure A and paragraph 1059 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1037 to 1060 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1064. White Oak does not know and therefore cannot admit paragraph 75AB.67 of the BCC/TM Annexure A and paragraph 1060 of the IAL Annexure A.

1065. White Oak does not know and therefore cannot admit paragraph 75AB.68 of the BCC/TM Annexure A and paragraph 1061 of the IAL Annexure A.

1066. In reply to paragraph 75AB.69 of the BCC/TM Annexure A and paragraph 1062 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1063 to 1065 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

1067. In reply to paragraph 75AB.70 of the BCC/TM Annexure A and paragraph 1063 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1037 to 1040, 1061, 1062, 1064 and 1065 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

D13 LIBERTY FRANCE

D13.5 Policy and Endorsements

1068. In reply to paragraph 78A.1 of the BCC/TM Annexure A and paragraph 1064 of the IAL Annexure A, White Oak:

(a) refers to paragraph 130 of the CS 6ASOC;

(b) says that it does not make any allegation as pleaded; and

(c) otherwise does not know and therefore cannot admit the paragraph.

1069. White Oak does not know and therefore cannot admit paragraph 78A.2 of the BCC/TM Annexure A and paragraph 1065 of the IAL Annexure A.

1070. White Oak does not know and therefore cannot admit paragraph 78A.3 of the BCC/TM Annexure A and paragraph 1066 of the IAL Annexure A.

1071. White Oak does not know and therefore cannot admit paragraph 78A.4 of the BCC/TM Annexure A and paragraph 1067 of the IAL Annexure A.

1072. White Oak does not know and therefore cannot admit paragraph 78A.5 of the BCC/TM Annexure A and paragraph 1068 of the IAL Annexure A.

1073. White Oak does not know and therefore cannot admit paragraph 78A.6 of the BCC/TM Annexure A and paragraph 1069 of the IAL Annexure A.

D13.6 Liberty France Misrepresentations and No Default Misrepresentation

The Representations

1074. White Oak does not know and therefore cannot admit paragraph 78A.7 of the BCC/TM Annexure A and paragraph 1070 of the IAL Annexure A.

1075. In reply to paragraph 78A.8 of the BCC/TM Annexure A and paragraph 1071 of the IAL Annexure A, White Oak:

(a) repeats paragraph 1074 above; and

(b) does not know and therefore cannot admit the paragraph.

1076. White Oak does not know and therefore cannot admit paragraph 78A.9 of the BCC/TM Annexure A and paragraph 1072 of the IAL Annexure A.

1077. In reply to paragraph 78A.10 of the BCC/TM Annexure A and paragraph 1073 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 31, 32, 33, 36, 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1078. White Oak does not know and therefore cannot admit paragraph 78A.11 of the BCC/TM Annexure A and paragraph 1074 of the IAL Annexure A.

1079. White Oak does not know and therefore cannot admit paragraph 78A.12 of the BCC/TM Annexure A and paragraph 1075 of the IAL Annexure A.

1080. White Oak does not know and therefore cannot admit paragraph 78A.13 of the BCC/TM Annexure A and paragraph 1076 of the IAL Annexure A.

1081. White Oak does not know and therefore cannot admit paragraph 78A.14 of the BCC/TM Annexure A and paragraph 1077 of the IAL Annexure A.

1082. White Oak does not know and therefore cannot admit paragraph 78A.15 of the BCC/TM Annexure A and paragraph 1078 of the IAL Annexure A.

1083. White Oak does not know and therefore cannot admit paragraph 78A.16 of the BCC/TM Annexure A and paragraph 1079 of the IAL Annexure A.

1084. White Oak does not know and therefore cannot admit paragraph 78A.17 of the BCC/TM Annexure A and paragraph 1080 of the IAL Annexure A.

1085. White Oak does not know and therefore cannot admit paragraph 78A.18 of the BCC/TM Annexure A and paragraph 1081 of the IAL Annexure A.

1086. White Oak does not know and therefore cannot admit paragraph 78A.19 of the BCC/TM Annexure A and paragraph 1082 of the IAL Annexure A.

1087. White Oak does not know and therefore cannot admit paragraph 78A.20 of the BCC/TM Annexure A and paragraph 1083 of the IAL Annexure A.

1088. In reply to paragraph 78A.21 of the BCC/TM Annexure A and paragraph 1084 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1074 to 1083 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1089. In reply to paragraph 78A.22 of the BCC/TM Annexure A and paragraph 1085 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1083 and 1086 above; and

(b) does not know and therefore cannot admit the paragraph.

1090. In reply to paragraph 78A.10 of the BCC/TM Annexure A and paragraph 1086 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 31, 32, 33, 36, 37, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Representations were misleading

1091. White Oak does not know and therefore cannot admit paragraph 78A.24 of the BCC/TM Annexure A and paragraph 1087 of the IAL Annexure A.

1092. White Oak does not know and therefore cannot admit paragraph 78A.25 of the BCC/TM Annexure A and paragraph 1088 of the IAL Annexure A.

1093. White Oak does not know and therefore cannot admit paragraph 78A.26 of the BCC/TM Annexure A and paragraph 1089 of the IAL Annexure A.

Knowledge of falsity of representations

1094. White Oak does not know and therefore cannot admit paragraph 78A.27 of the BCC/TM Annexure A and paragraph 1090 of the IAL Annexure A.

1095. In reply to paragraph 78A.28 of the BCC/TM Annexure A and paragraph 1091 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1096. In reply to paragraph 78A.29 of the BCC/TM Annexure A and paragraph 1092 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30 and 32 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1097. White Oak does not know and therefore cannot admit paragraph 78A.30 of the BCC/TM Annexure A and paragraph 1093 of the IAL Annexure A.

1098. In reply to paragraph 78A.31 of the BCC/TM Annexure A and paragraph 1094 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1099. In reply to paragraph 78A.32 of the BCC/TM Annexure A and paragraph 1095 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1100. White Oak does not know and therefore cannot admit paragraph 78A.33 of the BCC/TM Annexure A and paragraph 1096 of the IAL Annexure A.

1101. White Oak does not know and therefore cannot admit paragraph 78A.34 of the BCC/TM Annexure A and paragraph 1097 of the IAL Annexure A.

Knowledge of materiality of representations

1102. White Oak does not know and therefore cannot admit paragraph 78A.35 of the BCC/TM Annexure A and paragraph 1098 of the IAL Annexure A.

1103. White Oak does not know and therefore cannot admit paragraph 78A.35A of the BCC/TM Annexure A and paragraph 1099 of the IAL Annexure A.

1104. In reply to paragraph 78A.36 of the BCC/TM Annexure A and paragraph 1100 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1105. In reply to paragraph 78A.37 of the BCC/TM Annexure A and paragraph 1101 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1106. White Oak does not know and therefore cannot admit paragraph 78A.38 of the BCC/TM Annexure A and paragraph 1102 of the IAL Annexure A.

1107. White Oak does not know and therefore cannot admit paragraph 78A.38A of the BCC/TM Annexure A.

1108. In reply to paragraph 78A.39 of the BCC/TM Annexure A and paragraph 1103 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1109. In reply to paragraph 78A.40 of the BCC/TM Annexure A and paragraph 1104 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1110. White Oak does not know and therefore cannot admit paragraph 78A.41 of the BCC/TM Annexure A and paragraph 1105 of the IAL Annexure A.

1111. White Oak does not know and therefore cannot admit paragraph 78A.41A of the BCC/TM Annexure A and paragraph 1106 of the IAL Annexure A.

1112. In reply to paragraph 78A.42 of the BCC/TM Annexure A and paragraph 1107 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Misrepresentations were fraudulent

1113. In reply to paragraph 78A.43 of the BCC/TM Annexure A and paragraph 1108 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1091 to 1093, 1094, 1105 and 1112 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1114. White Oak does not know and therefore cannot admit paragraph 78A.44 of the BCC/TM Annexure A and paragraph 1109 of the IAL Annexure A.

1115. In reply to paragraph 78A.45 of the BCC/TM Annexure A and paragraph 1110 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1091 to 1114 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Innocent misrepresentation

1116. In reply to paragraph 78A.46 of the BCC/TM Annexure A and paragraph 1111 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1091 to 1093 and 1114 above; and

(b) does not know and therefore cannot admit the paragraph.

D13.7 Liberty France Non-Disclosures

Knowledge of underlying matters

1117. White Oak does not know and therefore cannot admit paragraph 78A.47 of the BCC/TM Annexure A and paragraph 1112 of the IAL Annexure A.

Knowledge of materiality

1118. White Oak does not know and therefore cannot admit paragraph 78A.48 of the BCC/TM Annexure A and paragraph 1113 of the IAL Annexure A.

1119. White Oak does not know and therefore cannot admit paragraph 78A.49 of the BCC/TM Annexure A and paragraph 1114 of the IAL Annexure A.

1120. In reply to paragraph 78A.50 of the BCC/TM Annexure A and paragraph 1115 of the IAL Annexure A, White Oak:

(a) repeats paragraph 36 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1121. In reply to paragraph 78A.51 of the BCC/TM Annexure A and paragraph 1116 of the IAL Annexure A, White Oak:

(a) repeats paragraph 30 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

1122. White Oak does not know and therefore cannot admit paragraph 78A.52 of the BCC/TM Annexure A and paragraph 1117 of the IAL Annexure A.

1123. In reply to paragraph 78A.53 of the BCC/TM Annexure A and paragraph 1118 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1117 to 1119 above; and

(b) does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

1124. In reply to paragraph 78A.54 of the BCC/TM Annexure A and paragraph 1119 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1117 to 1119 above; and

(b) does not know and therefore cannot admit the paragraph.

1125. White Oak does not know and therefore cannot admit paragraph 78A.55 of the BCC/TM Annexure A and paragraph 1120 of the IAL Annexure A.

1126. White Oak does not know and therefore cannot admit paragraph 78A.56 of the BCC/TM Annexure A and paragraph 1121 of the IAL Annexure A.

1127. In reply to paragraph 78A.57 of the BCC/TM Annexure A and paragraph 1122 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1124 to 1126 above; and

(b) does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

1128. In reply to paragraph 78A.58 of the BCC/TM Annexure A and paragraph 1123 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1117 to 1119 above; and

(b) does not know and therefore cannot admit the paragraph.

4 ONGOING INVESTIGATIONS

1129. White Oak does not know and therefore cannot admit paragraph 79 of the BCC/TM Annexure A.

E NON-DISCLOSURE OF EARLIER FRAUDULENT MISREPRESENTATIONS AND NON-DISCLOSURES

1130. In reply to paragraph 80 of the BCC/TM Annexure A and paragraph 1124 of the IAL Annexure A, White Oak:

(a) refers to Section G below; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1131. In reply to paragraph 81 of the BCC/TM Annexure A and paragraph 1125 of the IAL Annexure A, White Oak:

(a) refers to Section H below; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1132. White Oak does not know and therefore cannot admit paragraph 82 of the BCC/TM Annexure A and paragraph 1126 of the IAL Annexure A.

1133. White Oak does not know and therefore cannot admit paragraph 83 of the BCC/TM Annexure A and paragraph 1127 of the IAL Annexure A.

1134. White Oak does not know and therefore cannot admit paragraph 84 of the BCC/TM Annexure A and paragraph 1128 of the IAL Annexure A.

1135. White Oak does not know and therefore cannot admit paragraph 85 of the BCC/TM Annexure A and paragraph 1129 of the IAL Annexure A.

1136. White Oak does not know and therefore cannot admit paragraph 86 of the BCC/TM Annexure A and paragraph 1130 of the IAL Annexure A.

1137. In reply to paragraph 87 of the BCC/TM Annexure A and paragraph 1131 of the IAL Annexure A, White Oak:

(a) refers to Section G below;

(b) denies the paragraph in so far as it relates to policies relating to the "White Oak Proceeding"; and;

(c) otherwise does not know and therefore cannot admit the paragraph.

E1 Non-Disclosure of Moral Hazard

1138. White Oak does not know and therefore cannot admit paragraph 88 of the BCC/TM Annexure A and paragraph 1132 of the IAL Annexure A.

1139. White Oak does not know and therefore cannot admit paragraph 89 of the BCC/TM Annexure A and paragraph 1133 of the IAL Annexure A.

1140. White Oak does not know and therefore cannot admit paragraph 90 of the BCC/TM Annexure A and paragraph 1134 of the IAL Annexure A.

1141. White Oak denies paragraph 91 of the BCC/TM Annexure A and paragraph 1135 of the IAL Annexure A.

1142. In reply to paragraph 92 of the BCC/TM Annexure A and paragraph 1136 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 36, 39 and 40 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1143. In reply to paragraph 93 of the BCC/TM Annexure A and paragraph 1137 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 30, 32 and 33 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

1144. White Oak does not know and therefore cannot admit paragraph 93A of the BCC/TM Annexure A and paragraph 1138 of the IAL Annexure A.

1145. White Oak denies paragraph 93B of the BCC/TM Annexure A and paragraph 1139 of the IAL Annexure A.

1146. In reply to paragraph 93C of the BCC/TM Annexure A and paragraph 1140 of the IAL Annexure A, White Oak:

(a) repeats paragraph 37 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Breach of duty of disclosure

1147. White Oak does not know and therefore cannot admit paragraph 94 of the BCC/TM Annexure A and paragraph 1141 of the IAL Annexure A.

1148. In reply to paragraph 95 of the BCC/TM Annexure A and paragraph 1142 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 1141 to 1147 above; and

(b) otherwise does not know and therefore cannot admit the paragraph.

Fraudulent non-disclosure

1149. In reply to paragraph 96 of the BCC/TM Annexure A and paragraph 1143 of the IAL Annexure A, White Oak:

(a) repeats paragraph 1147 above; and

(b) does not know and therefore cannot admit the paragraph.

1150. White Oak does not know and therefore cannot admit paragraph 97 of the BCC/TM Annexure A and paragraph 1144 of the IAL Annexure A.

1151. In reply to paragraph 98 of the BCC/TM Annexure A and paragraph 1145 of the IAL Annexure A, White Oak:

(a) refers to Section G below;

(b) denies the paragraph in so far as it relates to each policy document relevant to the "White Oak Proceeding"; and

(c) otherwise does not know and therefore cannot admit the paragraph.

Innocent non-disclosure

1152. In reply to paragraph 99 of the BCC/TM Annexure A and paragraph 1146 of the IAL Annexure A, White Oak:

(a) denies the paragraph in so far as it relates to each policy document relevant to the "White Oak Proceeding"; and

(b) otherwise does not know and therefore cannot admit the paragraph.

F AVOIDANCE

1153. White Oak does not know and therefore cannot admit paragraph 100 of the BCC/TM Annexure A and paragraph 1147 of the IAL Annexure A.

1154. White Oak does not know and therefore cannot admit paragraph 101 of the BCC/TM Annexure A and paragraph 1148 of the IAL Annexure A.

1155. In reply to paragraph 1149 of the IAL Annexure A, White Oak

(a) refers to Section G below;

(b) denies the paragraph in so far as it relates to each policy document relevant to the "White Oak Proceeding"; and

(c) otherwise does not know and therefore cannot admit the paragraph.

1156. White Oak denies paragraph 103 of the BCC/TM Annexure A and paragraph 1150 of the IAL Annexure A.

G SCHEDULE OF POLICIES AND ENDORSEMENTS

1157. In reply to paragraph 104 of the BCC/TM Annexure A and paragraph 1151 of the IAL Annexure A, White Oak:

(a) repeats paragraphs 37G to 41A and 46 to 56D of the WO 5ASOC;

(b) admits items (4), (8), (34), (35), (43), (62), (68), (70), (76) to (78), (80), (81), (83), (91) to (93), (95), (96) and (101) of the schedule as it relates to White Oak;

(c) says that White Oak pleads, and relies on, the Customer Endorsement referred to at item 82 of the schedule; and

(d) otherwise does not know and therefore cannot admit the paragraph.

Particulars

As to subparagraph (c), White Oak repeats paragraph 46(d) of WO 5ASOC.

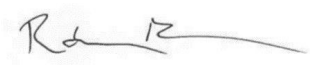
H SCHEDULE OF MISREPRESENTATIONS AND NON-DISCLOSURES

1158. In reply to Section H of the BCC/TM Annexure A and IAL Annexure A, White Oak:

(a) repeats each of its replies above to the paragraphs referred to in the last column; and

(b) otherwise does not know and therefore cannot admit the allegations.

Date: 7 September 2026



Signed by Rehana Box
Lawyer for the Applicant

This pleading was prepared by Rehana Box and Rani John, lawyers, and by Julian Sexton and Matthew Youssef of counsel.

Certificate of lawyer

I, Rehana Box, certify to the Court that, in relation to the reply filed on behalf of the Applicant, the factual and legal material available to me at present provides a proper basis for:

(a) each allegation in the pleading; and

(b) each denial in the pleading; and

(c) each non admission in the pleading.

Date: 7 September 2026



Signed by Rehana Box
Lawyer for the Applicant

Schedule

Respondents

Second Respondent:	BCC Trade Credit Pty Ltd ACN 608 296 233
Third Respondent:	Greg Brereton
Fourth Respondent:	Greensill Bank AG
Fifth Respondent:	Dr Michael Frege
Sixth Respondent:	Tokio Marine & Nichido Fire Insurance Co Ltd. ACN 000 438 291
Seventh Respondent:	Tokio Marine Management (Australasia) Pty Ltd ACN 001 488 455, of Level 17, 60 Margaret Street, Sydney NSW 2000