NOTICE OF FILING AND HEARING

Filing and Hearing Details

Document Lodged**:**	Notice of Cross-Claim - Form 31 - Rule 15.02(1)
Court of Filing:	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	20/04/2026 3:48:02 PM AEST
Date Accepted for Filing:	20/04/2026 4:30:17 PM AEST
File Number:	NSD1039/2021
File Title:	WHITE OAK COMMERCIAL FINANCE EUROPE (NON-LEVERED) LIMITED v INSURANCE AUSTRALIA LIMITED ACN 000 016 722
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA
Reason for Listing:	To Be Advised
Time and date for hearing:	To Be Advised
Place:	To Be Advised

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 31
Rule 15.02(1)

Amended Notice of cross-claim

No. NSD1039 of 2021

Federal Court of Australia
District Registry: New South Wales
Division: Commercial and Corporations National Practice Area

White Oak Commercial Finance Europe (Non-Levered) Limited

Applicant

Insurance Australia Limited (ACN 000 016 722) and others named in the schedule

Respondents

Insurance Australia Limited (ACN 000 016 722)

Cross-claimant

Tokio Marine & Nichido Fire Insurance Co Ltd (ACN 000 438 291) and others named in the schedule

Cross-respondents

To: Tokio Marine & Nichido Fire Insurance Co Ltd (ACN 000 438 291), Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455) and BCC Trade Credit Pty Ltd, the Cross-respondents (**Cross-respondents**)

The Cross-claimant Insurance Australia Limited, the First Respondent in the proceeding, applies for the relief set out in this cross-claim.

The Court will hear this cross-claim, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

If you have not already done so, you must file a notice of address for service (Form 10) in the Registry before attending Court or taking any other steps in the proceeding.

Filed on behalf of (name & role of party) Insurance Australia Limited
Prepared by (name of person/lawyer) Malcolm Stephens
Law firm (if applicable) Allens
Tel +61 2 9230 4000 Fax
Email Malcolm.Stephens@allens.com.au
Address for service (include state and postcode) Level 28, 126 Phillip Street, Sydney NSW 2000

Time and date for hearing	
Place	Law Courts Building, 184 Phillip Street, Queens Square, Sydney, NSW, 2000

The Court ordered that the time for serving this application be abridged to:

Date:

Signed by an officer acting with the authority of the District Registrar

Details of cross-claim

On the grounds stated in the statement of cross-claim, the Cross-claimant claims:

1. An order for contribution (or alternatively indemnity) pursuant to section 5 of the *Law Reform (Miscellaneous Provisions) 1946* (NSW) and/or s 12 of the *Law Reform (Miscellaneous Provisions) Act 1965* (NSW) and/or in equity, in respect of any amounts (including costs) which the Cross-claimant may be ordered to pay to the Applicant.
2. Interest.
3. Costs.
4. Such further order as the Court thinks fit.

Cross-claimant's address

The Cross-claimant's address for service is:

Place: Allens, Level 28, 126 Phillip Street, Sydney NSW 2000

Email: Malcolm.Stephens@allens.com.au; Kirsty.Prinsloo@allens.com.au

Service on the Cross-respondents

It is intended to serve this cross-claim on the Cross-respondents.

Date: 17 April 2026

M Stephens

Signed by Malcolm Stephens
Lawyer for the Cross-claimant

Schedule

No. NSD1039 of 2021

Federal Court of Australia

District Registry: New South Wales

Division: Commercial and Corporations National Practice Area

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)

Cross-respondents

Second Cross-respondent:	Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455)
Third Cross-respondent:	BCC Trade Credit Pty Ltd (ACN 608 296 233)