

NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 7/08/2020 6:29:50 PM AEST and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
File Number: NSD464/2020
File Title: APPLICATION IN THE MATTER OF VIRGIN AUSTRALIA HOLDINGS LTD (ADMINISTRATORS APPOINTED) ACN 100 686 226 & ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Dated: 7/08/2020 6:30:05 PM AEST

Registrar

Important Information

As required by the Court's Rules, 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 and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.



Form 59
Rule 29.02(1)

Affidavit

No. NSD 464 of 2020

Federal Court of Australia
District Registry: New South Wales
Division: Commercial and Corporations List

IN THE MATTER OF VIRGIN AUSTRALIA HOLDINGS LTD (ADMINISTRATORS APPOINTED) ACN 100 686 226 & ORS

VAUGHAN STRAWBRIDGE, SALVATORE ALGERI, JOHN GREIG AND RICHARD HUGHES, IN THEIR CAPACITY AS JOINT AND SEVERAL VOLUNTARY ADMINISTRATORS OF VIRGIN AUSTRALIA HOLDINGS LTD (ADMINISTRATORS APPOINTED) AND THE THIRD TO FORTIETH PLAINTIFFS NAMED IN SCHEDULE 1

First Plaintiffs

AND OTHERS NAMED IN THE SCHEDULE
Plaintiffs

Affidavit of: **Kassandra Suzann Adams**
Address: Level 15, 1 Bligh Street, Sydney NSW 2000
Occupation: Solicitor
Date: 7 August 2020

Contents

Document number	Details	Paragraph	Pages
1.	Affidavit of Kassandra Suzann Adams sworn on 6 August 2020	All	1 -
2.	Annexure "A", being a copy of Mr David Lombe's email to ASIC dated 7 August 2020	4	9 - 12
3.	Annexure "B", being a copy of the email sent to Virgin Group creditors dated 7 August 2020 on the Halo Platform	6	13

Filed on behalf of (name & role of party) The Plaintiffs
Prepared by (name of person/lawyer) Timothy James Sackar
Law firm (if applicable) Clayton Utz
Tel +61 2 9353 4000 Fax +61 2 8220 6700
Email kaadams@claytonutz.com
Address for service Level 15, 1 Bligh Street, Sydney NSW 2000
(include state and postcode)

[Version 3 form approved 02/05/2019]

Document number	Details	Paragraph	Pages
4.	Annexure "C", being a copy of the email sent to Virgin Group creditors dated 7 August 2020 to their email addresses	6	14 - 15
5.	Annexure "D", being a copy of the email sent to Corrs Chambers Westgarth dated 7 August 2020	8	16
6.	Annexure "E", being a copy of the email sent to Corrs Chambers Westgarth (Perth) dated 7 August 2020	9	17

I, Kassandra Suzann Adams, solicitor of Clayton Utz, Level 15, 1 Bligh Street, Sydney NSW 2000 swear:

1. I am a solicitor employed by Clayton Utz, solicitors for the Plaintiffs. I have the day to day carriage of this matter under the supervision of Timothy Sackar, a partner of Clayton Utz.
2. I make this affidavit from my own knowledge and belief, except where otherwise stated in which case I have stated the source of my knowledge.
3. I make this affidavit in relation to the Plaintiffs' Interlocutory Process dated 7 August 2020 (**Interlocutory Process**) and the supporting affidavits of David Michael Orr dated 6 August 2020 (**Orr Affidavit**) and Vaughan Neil Strawbridge dated 7 August 2020 (**Strawbridge Affidavit**) together with its exhibit marked VNS-5 (**Exhibit VNS-5**).

NOTICE OF THE INTERLOCUTORY PROCESS TO AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION (ASIC)

4. I am informed by David Lombe, Special Principal, Restructuring Services at Deloitte Touche Tohmatsu (of which Deloitte Financial Advisory Pty Ltd is a wholly owned subsidiary) (**Deloitte**) (**Mr Lombe**) and verily believe to be true that on 7 August 2020:
 - (a) at 11.07am, Mr Lombe sent an email to Yvan Dang (**Ms Dang**), Thea Eszenyi, Carl Sibilila and Adrian Furby, each employed by ASIC. The email gave notice of the Interlocutory Process, attached sealed copies of the Interlocutory Process, the Orr Affidavit, and the Strawbridge Affidavit as well as Exhibit VNS-5 and provided the Microsoft Teams details for the hearing listed for 2.15pm on Tuesday, 11 August 2020 before Justice Middleton in the Federal Court of Australia (**Hearing**); and
 - (b) at 1.25pm, Ms Dang, Senior Accountant, Insolvency Practitioners, ASIC confirmed receipt of the email from Mr Lombe.

A copy of the chain of correspondence (excluding its attachments as they are in the same form as filed with the Court) between Mr Lombe and Ms Dang is annexed to this affidavit and marked **Annexure A**.

NOTICE OF THE INTERLOCUTORY PROCESS TO THE CREDITORS OF THE SECOND TO FORTIETH PLAINTIFFS

5. I am informed by Matthew Carr, Manager, Restructuring Services at Deloitte (**Mr Carr**) and verily believe to be true that on 7 August 2020:
 - (a) at 10.35am, Mr Carr sent an email via Halo to 12,133 creditors that have registered as users (**Halo Users**); and
 - (b) at 10.53am, 10.55am, 10.56am, 10.59am, Mr Carr sent an identical email in four tranches to the known email address of the 1,995 creditors that have not yet registered on the Halo Platform (**Non-Halo Users**).
6. Each of the emails referred to paragraph 5 above:
 - (a) notified all known creditors of the Second Plaintiff to Fortieth Plaintiffs, VAH Newco No. 2 Pty Ltd (in liquidation) (Administrators Appointed), the proposed Forty-First Plaintiff, and VB Investco Pty Ltd (in liquidation) (Administrators Appointed), the proposed Forty-Second Plaintiff, that the First Plaintiff has caused to be filed an application seeking, among other things, further orders in relation to the use of the Halo Platform, to be heard at the Hearing;
 - (b) attached sealed copies of the Interlocutory Process, the Orr Affidavit and the Strawbridge Affidavit; and
 - (c) set out the Microsoft Teams details for the Hearing.

A copy of the email sent to the Halo Users (excluding its attachments) is annexed to this affidavit and marked **Annexure B** and a copy of the email sent to the Non-Halo Users (excluding its attachments) is annexed to this affidavit and marked **Annexure C**.

7. I am informed by Mr Carr that as a result of the Halo Users email being sent by via Halo and the Non-Halo Users email being sent by blind copy, to each of the creditors, the print-out of the emails contained in Annexure B and Annexure C do not identify the relevant recipients, however I verily being that the creditors referred to in paragraph 5 and 6 were issued to the respective emails.

NOTICE OF THE INTERLOCUTORY PROCESS TO CORRS CHAMBERS WESTGARTH

8. I am informed by Orla McCoy (**Ms McCoy**), Partner, Clayton Utz and verily believe to be true that on 7 August 2020 at 12.53pm, Ms McCoy sent an email to Andrew Edington

(**Mr Edington**), Senior Associate, Corrs Chambers Westgarth as legal representatives of Broad Peak Investment Advisers Pte. Ltd. (for and on behalf of Broad Peak Master Fund II Limited and Broad Peak Asia Credit Opportunities Holdings Pte. Ltd.). The email gave notice of the Interlocutory Process and attached sealed copies of the Interlocutory Process and the Orr Affidavit, the Strawbridge Affidavit and Exhibit VNS-5. It also referred to the Hearing and noted that a separate notification was sent to Mr Edington's clients. A copy of the email sent to Mr Edington (excluding its attachments) is annexed to this affidavit and marked **Annexure D**.

NOTICE OF THE INTERLOCUTORY PROCESS TO CORRS CHAMBERS WESTGARTH (PERTH)

9. I am informed by Orla McCoy (**Ms McCoy**), Partner, Clayton Utz and verily believe to be true that on 7 August 2020 at 12.54pm, Ms McCoy sent an email to Michelle Dean (**Ms Dean**), Partner, Corrs Chambers Westgarth as legal representatives of The Bank of New York Mellon, which is the trustee in respect of the US Senior Notes issued by the Second Plaintiffs. The email gave notice of the Interlocutory Process and attached sealed copies of the Interlocutory Process and the Orr Affidavit, the Strawbridge Affidavit and Exhibit VNS-5. It also referred to the Hearing and noted that a separate notification was sent to Mr Edington's clients. A copy of the email sent to Ms Dean (excluding its attachments) is annexed to this affidavit and marked **Annexure E**.

SWEARING OF THIS AFFIDAVIT

10. I have not been able to swear this affidavit in proper form at the time that I have signed it due to the measures I have taken to minimise the spread of COVID-19.
11. I have been informed by Madeleine Louise McCloy, as the proposed witness to this affidavit, and believe, that the relaxation of formality with respect to the unsworn nature of this affidavit does not diminish the need for me to satisfy myself that the contents of this affidavit are true and correct. I have satisfied myself that that is the case.
12. I will formally swear this affidavit when circumstances allow and will file the sworn version with the Court.

Sworn by the deponent)
at Sydney)
in New South Wales)
on 7 August 2020)
Before me:)

Signature of **Kassandra Suzann Adams**

Signature of witness
Madeleine Louise McCloy, Solicitor

SCHEDULE 1

Federal Court of Australia
 District Registry: New South Wales
 Division: General

No. NSD 464 of 2020

IN THE MATTER OF VIRGIN AUSTRALIA HOLDINGS LTD (ADMINISTRATORS APPOINTED) ACN 100 686 226 & ORS

Plaintiffs

- | | |
|---------------------|--|
| First Plaintiffs: | Vaughan Strawbridge, Salvatore Algeri, John Greig and Richard Hughes, in their capacity as joint and several voluntary administrators of each of the Second to Fortieth Plaintiffs |
| Second Plaintiff: | Virgin Australia Holdings Ltd (Administrators Appointed) ACN 100 686 226 |
| Third Plaintiff | Virgin Australia International Operations Pty Ltd (Administrators Appointed) ACN 155 859 608 |
| Fourth Plaintiff: | Virgin Australia International Holdings Pty Ltd (Administrators Appointed) ACN 155 860 021 |
| Fifth Plaintiff: | Virgin Australia International Airlines Pty Ltd (Administrators Appointed) ACN 125 580 823 |
| Sixth Plaintiff: | Virgin Australia Airlines (SE Asia) Pty Ltd (Administrators Appointed) ACN 097 892 389 |
| Seventh Plaintiff: | Virgin Australia Airlines Holdings Pty Ltd (Administrators Appointed) ACN 093 924 675 |
| Eighth Plaintiff: | VAH Newco No.1 Pty Ltd (Administrators Appointed) ACN 160 881 345 |
| Ninth Plaintiff: | Tiger Airways Australia Pty Limited (Administrators Appointed) ACN 124 369 008 |
| Tenth Plaintiff: | Virgin Australia Airlines Pty Ltd (Administrators Appointed) ACN 090 670 965 |
| Eleventh Plaintiff: | VA Borrower 2019 No. 1 Pty Ltd (Administrators Appointed) ACN 633 241 059 |

Twelfth Plaintiff:	VA Borrower 2019 No. 2 Pty Ltd (Administrators Appointed) ACN 637 371 343
Thirteenth Plaintiff:	Virgin Tech Pty Ltd (Administrators Appointed) ACN 101 808 879
Fourteenth Plaintiff:	Short Haul 2018 No. 1 Pty Ltd (Administrators Appointed) ACN 622 014 831
Fifteenth Plaintiff:	Short Haul 2017 No. 1 Pty Ltd (Administrators Appointed) ACN 617 644 390
Sixteenth Plaintiff:	Short Haul 2017 No. 2 Pty Ltd (Administrators Appointed) ACN 617 644 443
Seventeenth Plaintiff:	Short Haul 2017 No. 3 Pty Ltd (Administrators Appointed) ACN 622 014 813
Eighteenth Plaintiff:	VBNC5 Pty Ltd (Administrators Appointed) ACN 119 691 502
Nineteenth Plaintiff:	A.C.N. 098 904 262 Pty Ltd (Administrators Appointed) ACN 098 904 262
Twentieth Plaintiff:	Virgin Australia Regional Airlines Pty Ltd (Administrators Appointed) ACN 008 997 662
Twenty-first Plaintiff:	Virgin Australia Holidays Pty Ltd (Administrators Appointed) ACN 118 552 159
Twenty-second Plaintiff:	VB Ventures Pty Ltd (Administrators Appointed) ACN 125 139 004
Twenty-third Plaintiff:	Virgin Australia Cargo Pty Ltd (Administrators Appointed) ACN 600 667 838
Twenty-fourth Plaintiff:	VB Leaseco Pty Ltd (Administrators Appointed) ACN 134 268 741
Twenty-fifth Plaintiff:	VA Hold Co Pty Ltd (Administrators Appointed) ACN 165 507 157
Twenty-sixth Plaintiff:	VA Lease Co Pty Ltd (Administrators Appointed) ACN 165 507 291
Twenty-seventh Plaintiff:	Virgin Australia 2013-1 Issuer Co Pty Ltd (Administrators Appointed) ACN 165 507 326
Twenty-eighth Plaintiff:	737 2012 No.1 Pty. Ltd (Administrators Appointed) ACN 154 201 859

Twenty-ninth Plaintiff:	737 2012 No. 2 Pty Ltd (Administrators Appointed) ACN 154 225 064
Thirtieth Plaintiff:	Short Haul 2016 No. 1 Pty Ltd (Administrators Appointed) ACN 612 766 328
Thirty-first Plaintiff:	Short Haul 2016 No. 2 Pty Ltd (Administrators Appointed) ACN 612 796 077
Thirty-second Plaintiff:	Short Haul 2014 No. 1 Pty Ltd (Administrators Appointed) ACN 600 809 612
Thirty-third Plaintiff:	Short Haul 2014 No. 2 Pty Ltd (Administrators Appointed) ACN 600 878 199
Thirty-fourth Plaintiff:	VA Regional Leaseco Pty Ltd (Administrators Appointed) ACN 127 491 605
Thirty-fifth Plaintiff:	VB 800 2009 Pty Ltd (Administrators Appointed) ACN 135 488 934
Thirty-sixth Plaintiff:	VB Leaseco No 2 Pty Ltd (Administrators Appointed) ACN 142 533 319
Thirty-seventh Plaintiff:	VB LH 2008 No. 1 Pty Ltd (Administrators Appointed) ACN 134 280 354
Thirty-eighth Plaintiff:	VB LH 2008 No. 2 Pty Ltd (Administrators Appointed) ACN 134 288 805
Thirty-ninth Plaintiff:	VB PDP 2010-11 Pty Ltd (Administrators Appointed) ACN 140 818 266
Fortieth Plaintiff:	Tiger International Number 1 Pty Ltd (Administrators Appointed) ACN 606 131 944

From: Yvan Dang <Yvan.Dang@asic.gov.au>
Sent: Friday, 7 August 2020 1:25 PM
To: Lombe, David <dlombe@deloitte.com.au>
Cc: Thea Eszenyi <Thea.Eszenyi@asic.gov.au>; Carl Sibilila <Carl.Sibilila@asic.gov.au>; Adrian Furby <Adrian.Furby@asic.gov.au>
Subject: [EXT]RE: Virgin Court Application - Tuesday 11 August 2020 [SEC=OFFICIAL]

Thanks David.

Yvan Dang
Senior Accountant, Insolvency Practitioners
Australian Securities and Investments Commission

Level 7, 120 Collins Street, Melbourne, 3000
Tel: +61 3 9280 3405
yvan.dang@asic.gov.au



This and the following three pages are Annexure A referred to in the affidavit of Kassandra Suzann Adams sworn on 7 August 2020

Before me

From: Lombe, David <dlombe@deloitte.com.au>
Sent: Friday, 7 August 2020 11:07 AM
To: Yvan Dang <Yvan.Dang@asic.gov.au>; Thea Eszenyi <Thea.Eszenyi@asic.gov.au>; Carl Sibilila <Carl.Sibilila@asic.gov.au>; Adrian Furby <Adrian.Furby@asic.gov.au>
Subject: Virgin Court Application - Tuesday 11 August 2020

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Yvan,

Court Application In the matter of Virgin Australia Holdings Ltd (Administrators Appointed)

Further to my previous update emails I now provide a further update confirming that the Administrators have approached the Court in relation to an application they intend to make in these proceedings, to seek among other things:

- further orders in relation to the use of the Deloitte "Halo" claims management technology in the administration of the Virgin Group including for the purpose of the second meetings of creditors of the Virgin Group to be held pursuant to section 439A of the *Corporations Act 2001* (Cth) (**Second Meetings**); and
- orders granting the Administrators a 13 day extension to the date by which the Second Meetings must be held which, if granted, will mean that the Second Meetings must be held on or before 4 September 2020.

We refer to the above application and **attach** copies of the following documents:

1. unsealed interlocutory process filed in the Proceeding on 7 August 2020; and
2. unsealed affidavit of David Michael Orr filed in the Proceeding on 6 August 2020;
3. unsealed affidavit of Vaughan Neil Strawbridge together with Exhibit VNS-5 filed in the Proceeding on 7 August 2020.

This matter is listed for Hearing via Microsoft Teams (video-conference) in the Federal Court of Australia at **2:15pm** on **Tuesday 11 August 2020** before the Honourable Justice Middleton and can be accessed via the below link/dial in details:

[Join Microsoft Teams Meeting](#)

+61 2 9161 1229 Australia, Sydney (Toll)

Conference ID: 724 635 169#

[Local numbers](#) | [Reset PIN](#) | [Learn more about Teams](#) | [Meeting options](#)
Join with a video conferencing device
[862016018@t.plcm.vc](tel:862016018) VTC Conference ID: 1318001243
[Alternate VTC dialing instructions](#)

If you have any questions please let me know.

Kind regards,

David

David Lombe
Special Principal | Restructuring Services
Deloitte Financial Advisory Pty Ltd
Grosvenor Place, 225 George Street, Sydney, NSW, 2000
D: +61 2 9322 7400 | F: +61 2 9322 7001
dlombe@deloitte.com.au | www.deloitte.com

Deloitte.

Please consider the environment before printing

From: Lombe, David
Sent: Wednesday, 29 July 2020 2:05 PM
To: Yvan Dang <Yvan.Dang@asic.gov.au>; Thea Eszenyi <Thea.Eszenyi@asic.gov.au>; Carl Sibilía <Carl.Sibilía@asic.gov.au>
Subject: Virgin COI Meeting - Fri, 31 July 2020

Dear Yvan,

I wanted to take the opportunity to provide you with a quick heads up regarding a new application to the Court to extend the convening period and some mechanical issues regarding the second meeting of creditors.

The extension is largely to do with giving creditors enough time to properly consider the Administrators Section 439A report. The extension is in the order of 2 weeks.

The second issue relates to the requirement for creditors to provide proofs of debt and their voting at least 3 days before the creditors meeting.

I have attached a copy of the COI meeting that has been called for Friday this week where the Administrators will provide an overall update and also canvass these issues.

If you require any assistance please do not hesitate to contact me.

Regards,

David

David Lombe

Special Principal| Restructuring Services
Deloitte Financial Advisory Pty Ltd
Grosvenor Place, 225 George Street, Sydney, NSW, 2000
D: +61 2 9322 7400 | F: +61 2 9322 7001
dlombe@deloitte.com.au | www.deloitte.com

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Sent	<div style="width: 100%;"><div style="width: 100%;"></div></div> 100%
Failed	<div style="width: 0%;"><div style="width: 0%;"></div></div> 0%

This is Annexure B referred to in the affidavit of Kassandra Suzann Adams sworn on 7 August 2020

Before me

101739 Case(s)

[Download List](#)

Sent email to 12133 user(s) of 101739 case(s).

Sender

Virgin Halo Administrator <virginhalo@deloitte.com.au>

Subject

In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020

Content

Dear Sir / Madam,

In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020 (Proceeding)

The purpose of this communication is to notify you that the Administrators have made an application in the Proceeding seeking, among other things:

- further orders in relation to the use of the Deloitte "Halo" claims management technology in the administration of the Virgin Group including for the purpose of the second meetings of creditors of the Virgin Group to be held pursuant to section 439A of the Corporations Act 2001 (Cth) (**Second Meetings**); and
- orders granting the Administrators a 13 day extension to the date by which the Second Meetings must be held which, if granted, will mean that the Second Meetings must be held on or before 4 September 2020.

We refer to the above application and **attach** copies of the following documents:

1. unsealed interlocutory process filed in the Proceeding on 6th August 2020; and
2. unsealed affidavit of David Michael Orr filed in the Proceeding on 6 August 2020;
3. unsealed affidavit of Vaughan Neil Strawbridge together with Exhibit VNS-5 filed in the Proceeding on 6th August 2020.

This matter is listed for Hearing via Microsoft Teams (video-conference) in the Federal Court of Australia at **2:15pm** on **Tuesday 11 August 2020** before the Honourable Justice Middleton.

Why am I receiving this email?

The Administrators wish to provide notice of the application to all known creditors of the Virgin Group.

What action is required by me?

No action is required by you, the purpose of this email is to keep you informed of the Orders that the Administrators are seeking to obtain from the Court. Should you wish to attend the Hearing, please refer to the details contained at the end of this email.

Kind regards

Vaughan Strawbridge, Sal Algeri, John Greig and Richard Hughes

Joint and Several Administrators of the Virgin Group

Join by Phone

Phone: 02 9161 1229
Conference ID: 724 635 169#

Join with a video conferencing device

862016018@t.plcm.vc
VTC Conference ID: 1318001243

You must join this meeting no later than 15 minutes before the start of the hearing time.

If you wish to join the hearing by telephone you may dial the telephone number above and key in the conference ID when prompted. Any telephone attendances must be done prior to the start of the hearing - you cannot join via telephone once the hearing has started.

Should you wish to attend the hearing via a Microsoft Teams link, please contact the Administrators.

If you are observing the hearing you must have your microphone on mute and turn your webcam off.

[Affidavit of Vaughan Neil Strawbridge dated 7 August 2020.PDF](#)

[IP - Extension of Convening Period and Residual Halo Orders.pdf](#)

[Affidavit of David Orr dated 6 August 2020.PDF](#)

Lonsdale, Thomas

From: virginhalo@deloitte.com.au
Sent: Friday, 7 August 2020 10:53 AM
Subject: In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020
Attachments: Affidavit of David Orr dated 6 August 2020.PDF; Affidavit of Vaughan Neil Strawbridge dated 7 August 2020.PDF; IP - Extension of Convening Period and Residual Halo Orders.pdf

Dear Sir / Madam,

In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020 (Proceeding)

The purpose of this communication is to notify you that the Administrators have made an application in the Proceeding seeking, among other things:

- further orders in relation to the use of the Deloitte "Halo" claims management technology in the administration of the Virgin Group including for the purpose of the second meetings of creditors of the Virgin Group to be held pursuant to section 439A of the *Corporations Act 2001* (Cth) (**Second Meetings**); and
- orders granting the Administrators a 13 day extension to the date by which the Second Meetings must be held which, if granted, will mean that the Second Meetings must be held on or before 4 September 2020.

We refer to the above application and **attach** copies of the following documents:

1. unsealed interlocutory process filed in the Proceeding on 67 August 2020; and
2. unsealed affidavit of David Michael Orr filed in the Proceeding on 6 August 2020;
3. unsealed affidavit of Vaughan Neil Strawbridge together with Exhibit VNS-5 filed in the Proceeding on 67 August 2020.

This matter is listed for Hearing via Microsoft Teams (video-conference) in the Federal Court of Australia at **2:15pm on Tuesday 11 August 2020** before the Honourable Justice Middleton.

Why am I receiving this email?

The Administrators wish to provide notice of the application to all known creditors of the Virgin Group.

What action is required by me?

No action is required by you, the purpose of this email is to keep you informed of the Orders that the Administrators are seeking to obtain from the Court. Should you wish to attend the Hearing, please refer to the details contained at the end of this email.

Kind regards

Vaughan Strawbridge, Sal Algeri, John Greig and Richard Hughes
Joint and Several Administrators of the Virgin Group

Deloitte.

Please consider the environment before printing.

This and the following page are Annexure C referred to in the affidavit of Kassandra Suzann Adams sworn on 7 August 2020

Before me

Join by Phone

Phone: 02 9161 1229

Conference ID: 724 635 169#

Join with a video conferencing device

862016018@t.plcm.vc

VTC Conference ID: 1318001243

You must join this meeting no later than 15 minutes before the start of the hearing time.

If you wish to join the hearing by telephone you may dial the telephone number above and key in the conference ID when prompted. Any telephone attendances must be done prior to the start of the hearing - you cannot join via telephone once the hearing has started.

Should you wish to attend the hearing via a Microsoft Teams link, please contact the Administrators.

If you are observing the hearing you must have your microphone on mute and turn your webcam off.

Lonsdale, Thomas

From: McCoy, Orla
Sent: Friday, 7 August 2020 12:53 PM
To: Andrew Edington'
Cc: Cameron Cheetham (cameron.cheetham@corrs.com.au); Michael Catchpoole; Sackar, Timothy; Glavac, Mikhail; Gardner, Tom; Project Volar
Subject: NSD464 of 2020 - In the Matter of Virgin Australia Holdings Ltd (Administrators Appointed) [CU-Legal.FID3017446]
Attachments: In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020

Dear Andrew

Please see **attached** (as a courtesy) copies of the following documents filed in proceedings NSD464/2020 in respect of an application for an extension of the convening period and other relief, listed for hearing at 2.15pm next Tuesday, which were sent to your clients, BroadPeak and Tor, by Deloitte this morning via the Halo platform. A copy of the cover email which your clients will have received is also attached.

1. interlocutory process filed 7 August 2020; and
2. affidavit of David Michael Orr filed 6 August 2020;
3. affidavit of Vaughan Neil Strawbridge together with Exhibit VNS-5 filed 7 August 2020.

Kind regards

Orla M. McCoy, Partner
Clayton Utz

Level 15, 1 Bligh Street, Sydney NSW 2000 Australia | D +612 9353 4240 | F +612 8220 6700

omccoy@claytonutz.com | www.claytonutz.com

Please consider the environment before printing this e-mail

This is Annexure D referred to in the affidavit of
Kassandra Suzann Adams sworn on 7 August 2020

Before me

Lonsdale, Thomas

From: McCoy, Orla
Sent: Friday, 7 August 2020 12:54 PM
To: michelle.dean@corrs.com.au
Cc: Sackar, Timothy; Dailey, Renée; Moore, Naomi; Sparks, Grant
Subject: NSD464 of 2020 - In the Matter of Virgin Australia Holdings Ltd (Administrators Appointed) [CU-Legal.FID3017446]
Attachments: In the matter of Virgin Australia Holdings Ltd (Administrators Appointed) NSD 464 of 2020

Dear Michelle

Please see **attached** (as a courtesy) copies of the following documents filed in proceedings NSD464/2020 in respect of an application for an extension of the convening period and other relief, listed for hearing at 2.15pm next Tuesday, which were sent to your client by Deloitte this morning via the Halo platform (a copy of the cover email which your client will have received is also attached):

1. interlocutory process filed 7 August 2020; and
2. affidavit of David Michael Orr filed 6 August 2020;
3. affidavit of Vaughan Neil Strawbridge together with Exhibit VNS-5 filed 7 August 2020.

Kind regards

Orla M. McCoy, Partner
Clayton Utz

Level 15, 1 Bligh Street, Sydney NSW 2000 Australia | D +612 9353 4240 | F +612 8220 6700

omccoy@claytonutz.com | www.claytonutz.com

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This is Annexure E referred to in the affidavit of
Kassandra Suzann Adams sworn on 7 August 2020

Before me
