

**IN THE GENERAL DIVISION OF THE HIGH COURT OF THE REPUBLIC OF SINGAPORE**

Case No.: HC/OA 317/2022  
Sub Case No.: HC/SUM 2542/2022  
Filed: 12-July-2022 03:06 PM  
Hearing Date/Time: For determination  
by Judge / Registrar. Solicitor(s)/  
parties need not attend unless  
specifically directed to do so.



In the matter of Part 11 of the Insolvency, Restructuring and  
Dissolution Act (Act 40 of 2018)

And

In the matter of Section 252 of the Insolvency, Restructuring and  
Dissolution Act 2018

And

In the matter of the Third Schedule of the Insolvency, Restructuring  
and Dissolution Act 2018 (No. 40 of 2018)

And

In the matter of Article 15 of the UNCITRAL Model Law on  
Cross-Border Insolvency

And

In the matter of the Appointment of Liquidators in the High Court of  
the Territory of the British Virgin Islands over Three Arrows  
Capital Ltd (BVI Company No. 1710531) on 27 June 2022, by way  
of BVIHC(COM)2022/0119 and BVIHC(COM)2022/0117

And

In the matter of THREE ARROWS CAPITAL LTD (BVI  
Company No. 1710531)

1. THREE ARROWS CAPITAL LTD  
(British Virgin Islands Registration No. 1710531)
2. CHRISTOPHER FARMER  
(United Kingdom Passport No. 525512120)  
solely in his capacity as a duly appointed joint liquidator of Three  
Arrows Capital Ltd
3. RUSSELL CRUMPLER  
(United Kingdom Passport No. 537127838)  
solely in his capacity as a duly appointed joint liquidator of Three  
Arrows Capital Ltd

...Applicant(s)

**SUMMONS FOR INTERIM RELIEF**

1. The Applicants are applying to the Court for the following orders:

1. Pending the final determination of HC/OA 317/2022, and except with the consent of the Second and Third Applicants (“**Liquidators**”) or with leave of the Court:
  - a. Commencement or continuation of individual actions or individual proceedings concerning Three Arrows Capital Ltd (in Liquidation)’s (“**Three Arrows Capital**”) property, rights, obligations or liabilities, including without limitation HC/OA 247/2022 and all applications made thereunder, is stayed in accordance with Article 19(1)(c) of the Model Law, read with Article 21(1)(g) of the Model Law and s 96(4)(c) of the Insolvency, Restructuring and Dissolution Act.
  - b. No order may be made, and no resolution may be passed, for the winding up of Three Arrows Capital in Singapore in accordance with Article 19(1)(c) of the Model Law, read with Article 21(1)(g) of the Model Law and section 96(4)(a) of the Insolvency, Restructuring and Dissolution Act.
  - c. No receiver or manager may be appointed over any property or undertaking of Three Arrows Capital in Singapore in accordance with Article 19(1)(c) of the Model Law, read with Article 21(1)(g) of the Model Law and section 96(4)(b) of the Insolvency, Restructuring and Dissolution Act.
  - d. Execution against Three Arrows Capital’s property is stayed in accordance with Article 19(1)(a) of the Model Law.
  - e. No step may be taken to enforce any security over any property of Three Arrows Capital in Singapore, or to repossess any goods under any hire-purchase agreement, chattels leasing agreement or retention of title agreement in Singapore in accordance with Article 19(1)(c) of the Model Law, read with Article 21(1)(g) of the Model Law and section 96(4)(e) of the Insolvency, Restructuring and Dissolution Act.
  - f. No right of re-entry or forfeiture under any lease in respect of any premises occupied by Three Arrows Capital may be enforced in Singapore in accordance with Article 19(1)(c) of the Model Law, read with Article 21(1)(g) of the Model Law and section 96(4)(f) of the Insolvency, Restructuring and Dissolution Act.
  - g. The right to transfer, encumber or otherwise dispose of any property of Three Arrows Capital is suspended in accordance with Article 19(1)(c) read with Article 21(1)(c) of the Model Law.
2. The administration or realisation of all or part of the property of Three Arrows Capital located in Singapore be hereby entrusted to the Liquidators, in order to protect and preserve the value of property that, by its nature or because of other circumstances, is perishable, susceptible to devaluation or otherwise in jeopardy in accordance with Article 19(1)(b) of the Model Law, which shall include without limitation, accessing and obtaining electronic assets or other assets from the premises in Singapore where Three Arrows Capital or its agents or affiliates engaged in any business or activities, including the premises at 7 Suntec Tower One, #21-04 Temasek Boulevard, Singapore 038987.
3. The Liquidators shall be authorised to conduct the the examination of witnesses, the taking of evidence or the delivery of information concerning Three Arrows Capital’s property, affairs, rights, obligations or liabilities in accordance with Article 19(1)(c) read with Article 21(1)(d) of the Model Law, including without limitation:
  - a. to take and/or receive any documents belonging to Three Arrows Capital and/or obtain production of the same, which for the avoidance of doubt includes legal and other professional advice, from any third party with possession, custody, or power of the said documents belonging to Three Arrows Capital; and
  - b. to access and obtain books, records and/or other information and documents from the premises in Singapore where Three Arrows Capital or its agents or affiliates engaged in any business or activities, including the premises at 7 Suntec Tower One, #21-04 Temasek Boulevard, Singapore 038987.
4. Liberty for the Applicants to apply.
5. Costs of and incidental to this summons are to be paid out of Three Arrows Capital’s assets.
6. Such further and / or other relief as this Honourable Court deems fit.

2. The evidence supporting this summons is stated in the 1st affidavit of Russell Crumpler dated 9 July 2022 filed in

support of HC/OA 317/2022.

We certify that this is an application (without notice).

Certified by:

Solicitor(s) for the Applicant(s)  
WONGPARTNERSHIP LLP

Issued by :

Solicitor(s) for the 1st , 2nd and 3rd Applicant(s)

WONGPARTNERSHIP LLP  
12 Marina Boulevard #28-01 Marina Bay Financial Ctr Twr 3  
Singapore 018982  
Tel No.: 64168000  
Fax No.: 65325722  
File Ref No.: MSD/LLZW/DLZX/MIKO/SMCH/KWKS/3AC  
Solicitor in charge: 1. MANOJ PILLAY SANDRASEGARA  
2. LIONEL LEO ZHEN WEI  
3. LIU ZHAO XIANG  
4. MUHAMMED ISMAIL BIN KO NOORDIN  
5. CHIA SHI MEI  
6. KWONG KAI SHENG



HC/OA317/2022; HC/SUM2542/2022; HC/OA317/2022; HC/SUM2542/2022; HC/OA317/2022; HC/S

TEH HWEE HWEE  
REGISTRAR  
SUPREME COURT  
SINGAPORE