



IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION

FSD CAUSE NO: [ ] OF 2023

IN THE MATTER OF SECTIONS 159 OF THE COMPANIES ACT (2022 REVISION)  
AND IN THE MATTER OF O.102 r.18  
AND IN THE MATTER OF ZAMIN FERROUS LTD.

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PETITION

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To: The Grand Court of the Cayman Islands

**THE HUMBLE PETITION** of Anglo Ferrous Brazil Participações S.A (f/k/a Anglo Ferrous Brazil S.A.), of Rua Maria Luiza Santiago, n. 200, 16º andar, Bairro Santa Lúcia, CEP 30360-740, Belo Horizonte – MG, Brazil (the "Petitioner"), shows that:-

1. Zamin Ferrous Ltd. (the "**Company**") was incorporated and registered as an exempt company (registration number 186032) under the Companies Act on 20 April 2007.
2. The last known registered office of the Company was Cayman Fiduciary Limited, Third Floor, Landmark Square, 64 Earth Close, PO Box 707 Camana Bay, Grand Cayman, KY1-9 006, Cayman Islands.
3. The business of the Company appears to have been as a holding company with interests that included ownership of, or investments, in entities involved in mining activities.
4. The Company was struck off the register of companies on 29 April 2022.
5. Forbes Hare Trust Company Limited of Cassia Court, Suite 716, 10 Market Street Camana Bay, Grand Cayman, KY1-9006, Cayman Islands, has agreed to be the registered office of the Company.
6. The amount of the reinstatement fee payable upon restoring the Company to the register of companies is CI\$3,070.

7. The Petitioner has a claim against the Company for a minimum of US\$17,000,000 in respect of substantial losses it is seeking to recover via its claims for declarations and damages on the basis of indemnity claims and breach of contract claims against the Company. The Petitioner issued proceedings in respect of these claims in the Supreme Court in the State of New York, County of New York on 28 October 2022.
8. It appears that the Company's registered office resigned between 26 November 2019 and 31 March 2022 and the Company's directors have not since appointed a new registered office. The Petitioner is therefore unable to serve its proceedings against the Company at its registered office nor is the Petitioner able to serve any judgment entered against the Company following the Company's strike off.
9. Unless the Company is reinstated, the Petitioner will be left without a remedy.
10. In the circumstances, it is just and equitable that the Company be restored to the register of companies.

The Petitioner therefore prays that:

1. the Company be restored to the register of companies;
2. the Company be deemed to have continued in existence as if it had not been struck off;
3. such other orders or directions may be made as the Court thinks fit.

Dated this 19th day of January 2023



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Forbes Hare  
Attorneys at Law for the Petitioner

It is intended that this Petition be served on:

- 1) the company at its last known registered office
- 2) the Registrar of Companies.

FILED by Forbes Hare, attorneys for the Petitioner, whose address for service is Cassia Court, Camana Bay, Grand Cayman, KY1-9006, Cayman Islands.

**NOTICE OF HEARING**

TAKE NOTICE THAT the hearing of this petition will take place at the Law Courts, George Town, Grand Cayman on the <sup>23<sup>rd</sup></sup> day of *February* 2023 at <sup>10</sup>~~am~~<sup>pm</sup>.

Any correspondence or communication with the Court related to the hearing of this petition should be addressed to the Registrar of the Financial Services Division of the Grand Court at PO Box 495, Grand Cayman, KY1-1106 telephone 345-949-4296