



THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO: FSD 192 OF 2025 (____)

**IN THE MATTER OF SECTIONS 94 AND 159 OF THE COMPANIES ACT (2025
REVISION)**

AND IN THE MATTER OF SEQUOIADB SOFTWARE LTD

PETITION

TO THE GRAND COURT OF THE CAYMAN ISLANDS

The petition of New Trident Holdings Limited of Sertus Chambers, P.O. Box 905, Quastisky Building, Road Town, Tortola, British Virgin Islands shows that:

Matters to be addressed in the petition pursuant to Form No. 68 GCR

1. SequoiaDB Software Ltd (**Company**) was incorporated and registered (registration no. 2981858) on 17 September 2014 under the Companies Act (as amended and revised) (**Companies Act**).
2. The last known registered office of the Company was at the offices of Vistra (Cayman) Limited (**Vistra**), P.O. Box 31119 Grand Pavilion, Hibiscus Way, 802 West Bay Road, Grand Cayman, Cayman Islands.
3. The Company was struck off the register of companies (**Register**) on 30 April 2025.
4. The amount of the reinstatement fee payable upon restoring the Company to the register of companies is CI\$3,241.70, calculated up to 30 September 2025.

5. The Company is indebted to your petitioner (**Petitioner**) in the sum of US\$23,999,822, in the circumstances detailed herein.
6. In the circumstances detailed herein: (i) the Company is insolvent; and (ii) it is just and equitable that the Company be restored to the Register and wound up under the provisions of the Companies Act.

The Company

7. The Company is the ultimate holding company of the SequoiaDB business/group (**Group**), a PRC based software manufacturer specialising in research and development of distributed database technology. The Group is structured in a manner common for PRC-based businesses. The Company wholly-owns a Hong Kong subsidiary, which in turn wholly-owns a PRC 'WFOE' (wholly foreign owned enterprise). The WFOE enjoys contractual rights with respect to the PRC operating entities through certain 'VIE' (variable interest entity) agreements.
8. The share capital of the Company is divided into the following shares classes and series:
 - (a) Ordinary Shares;
 - (b) Series A Preferred Shares;
 - (c) Series B Preferred Shares; and
 - (d) Series C Preferred Shares.
9. In addition, the Company has issued Series D Warrants and WFOE Series D Convertible Bonds, convertible into Series D Preferred Shares in the circumstances detailed in the Group's governing documents. In this Petition, the Series A through D Preferred Shareholders / Warrant holders are referred to as '**Preferred Shareholders**'.
10. The board of directors of the Company consists of:
 - (a) the following two executive directors (**Founder Directors**):
 - (i) Mr Xun Tang, Chief Executive Officer (**CEO**); and
 - (ii) Mr Tao Wang; and
 - (b) the following non-executive directors (**Investor Directors**):

- (i) Mr Kuantai Yeh, representing the majority holders of the Series A Preferred Shares;
 - (ii) Mr Zhenyu Zeng, representing the majority holders of the Series B Preferred Shares;
 - (iii) Mr Xiaochuan Qiu, representing the majority holders of the Series C Preferred Shares;
 - (iv) Mr Wang Lei, representing the majority holders of the Series D Preferred Shares / Series D Warrants (calculated on a consolidated basis as if the Series D Warrants were exercised).
11. The CEO has responsibility for the day-to-day management of the Company together with members of the management team employed by the Company (**Management Team**), including Mr Li Fangzhou (**Mr Li**). The relative voting entitlements of the directors confers control of the Company on the Founder Directors, as they are each entitled to three votes at board meetings (six in total), whereas the Investors Directors are entitled to one vote each (four in total). As the Founder Directors control the board, averments made in this Petition regarding the Company should be taken be averments with respect to the Founder Directors where the context requires.
12. The Group has not been the success that the Petitioner and the Supporting Creditors (defined below, and together with the Petitioner, the **Redeeming Shareholders**) had expected. The Founder Directors have proffered various explanations for the Group's poor performance, but the bottom line is that the Redeeming Shareholders enjoy an unequivocal contractual right to exit the Company given its failure to conduct an Initial Public Offering (**IPO**) on or prior to 31 December 2023.¹ The Redeeming Shareholders' patience with the Founding Directors has entirely run out.
13. The many serious issues facing the Company, and the management failures of the Founder Directors, were aptly summed up by a Redeeming Shareholder when submitting its redemption notice in October 2024:

Despite the Company's early start, SequoiaDB has not captured the market meaningfully, resulting in modest revenue growth, ongoing financial losses, and a lack of a clear path to an IPO or any other form of exit for Qiming within a reasonable timeframe. Furthermore, for the past two years, you have remained

¹ The Articles contain additional grounds independently conferring a right of redemption on the Preferred Shareholders.

outside China, choosing not to directly manage the Company, engage with customers, or meet with employees in person. This has persisted despite multiple communications from investors urging your return.

Additionally, the Company has repeatedly bypassed essential corporate governance processes, including timely notifications, regular board meetings, proper resolutions for the board and shareholders, adherence to information rights, and seeking shareholder approvals. These actions are in clear violation of the corporate governance and legal agreements established between the Company and Qiming. Unfortunately, after these issues were raised with you, no tangible steps have been taken by you or your team to remedy the situation.

14. The Company is embroiled in arbitration proceedings with certain Series D Preferred Shareholders / Warrant holders, in which the Company may be liable for claims in excess of RMB 400 million (circa USD 55 million). According to the Management Team, the Company is unable to satisfy these claims.
15. Moreover, the Redeeming Shareholders are justifiably concerned that the Company may be attempting to use the 'VIE' structure to improperly avoid its obligations. The control of the Company's subsidiaries does not comply with the agreed upon structure.

Strike off

16. The management failures of the CEO extend to allowing the Company to be struck off the Register on or about 30 April 2025. The CORIS search report on the Company indicates that its striking off was due to its registered office having resigned, which the Petitioner avers should not have occurred in circumstances where it had expressly drawn this issue to their attention.
17. The Management Team may contend that the Redeeming Shareholders caused or contributed to the strike off, in so far as Vistra allegedly required additional know-your-client (**KYC**) information, not all of which was provided. The Petitioner however maintains that such an argument is unsustainable for the following reasons:
 - 17.1 First, while it is accepted that Mr Li requested certain KYC information in December 2023 and October 2024, the request was not followed up. Moreover, the Supporting Creditors (as defined below) are private funds registered with the Cayman Islands Monetary Authority (**CIMA**) for whom the usual KYC requirement is significantly less.

- 17.2 Secondly, the Management Team did not notify the Preferred Shareholders of the resignation of Vistra or of the pending strike off, failed to take any or any adequate steps to prevent the strike off, and to this day have not applied to restore the Company to the Register. The Petitioner avers that this constitutes an egregious breach of duty on the part of the CEO and the Management Team, whose actions have seriously jeopardised the interests of the shareholders of the Company and the significant investments made by them. Even if certain KYC information was outstanding, other measures should have been taken by the Management Team to deal with this issue rather than allowing the Company to be struck off.
18. The Assistant Registrar of Companies confirmed, by letter dated 26 June 2025, that the Registrar does not oppose the Company being reinstated, provided the reinstatement fee is paid.

The Petitioner

19. The Petitioner is the registered holder of 3,615,384 Series C1 Preferred Shares in the Company.
20. By notice to the Company dated 15 October 2024, the Petitioner requested to redeem its shares for a redemption price of US\$23,999,822.84.
21. The redemption price was payable on or before 15 January 2025.
22. As as the date of this Petition, the redemption price remains unpaid. The Company is indebted to the Petitioner in the sum of US\$23,999,822.

The Supporting Creditors

23. The following entities are also Preferred Shareholders and redemption creditors of the Company:
- (a) Qiming Venture Partners IV, L.P. (**QVP**)
 - (b) Qiming Managing Directors Fund IV, L.P. (**QMD**);
 - (c) DCM Ventures China Fund (DCM VII), L.P. (**DVC**); and
 - (d) DCM VII, L.P. (**DVII**),

(**Supporting Creditors**, and together with the Petitioner, the **Redeeming Shareholders**).

QVP:

24. QVP is the registered holder of 2,665,828 Series A Preferred Shares, 610,197 Series B Preferred Shares and 109,523 Series C1-A Preferred Shares.
25. By notice to the Company dated 27 September 2024, QVP requested to redeem its shares for a redemption price of US\$9,451,557.
26. The redemption price was payable on or before 8 January 2025.
27. As the date of this Petition, the redemption price remains unpaid. The Company is indebted to QVP in the sum of US\$9,451,557.

QMD:

28. QMD is the registered holder of 84,172 Series A Preferred Shares, 19,267 Series B Preferred Shares and 3,458 Series C1-A Preferred Shares.
29. By notice to the Company dated 27 September 2024, QMD requested to redeem its shares for a redemption price of US\$298,428.
30. The redemption price was payable on or before 8 January 2025.
31. As the date of this Petition, the redemption price remains unpaid. The Company is indebted to QMD in the sum of US\$298,428.

DVC:

32. DVC is the registered holder of 2,105,209 Series B Preferred Shares and 103,052 Series C1-A Preferred Shares.
33. By notice to the Company dated 30 October 2024, DVC requested to redeem its shares for a redemption price of US\$8,209,154. The redemption price was payable on or before 11 February 2025.
34. As the date of this Petition, the redemption price remains unpaid. The Company is indebted to DVC in the sum of US\$8,209,154.

DVII:

35. DVII is the registered holder of 202,827 Series B Preferred Shares and 9,929 Series C1-A Preferred Shares.
36. By notice to the Company dated 30 October 2024, DVC requested to redeem its shares for a combined redemption price of US\$790,916. The redemption price was payable on or before 11 February 2025.
37. As the date of this Petition, the redemption price remains unpaid. The Company is indebted to DVC in the sum of US\$790,916.

Redemption Debt and the Company's insolvency

38. The Company is indebted to the Petitioner in the sum of US\$23,999,822.84, and to the Supporting Creditors in the sum of US\$18,750,055. The total sum of US\$42,749,877 is due and payable to the Redeeming Shareholders (**Redemption Debt**).
39. By email dated 15 October 2024, the Company stated that it was facing arbitration claims by Series D investors exceeding RMB 400 million (circa USD 55 million), "... *which the [C]ompany is currently unable to satisfy*".
40. Despite promising to do so, the Company has not issued even draft financial statements for the 2024 financial year, but it is averred that the Company is hopelessly insolvent, with it being liable for close to USD 100 million in debts to the Preferred Shareholders / Warrant holders.

Particulars of the circumstances in which the Redemption Debt aroseGoverning Documents:

41. The legal relationship between the Company and the Redeeming Shareholders is governed by a number of transaction documents including:
 - (a) The Fourth Amended and Restated Memorandum and Articles of Association (**Articles**), adopted by Special Resolution on 14 September 2020; and
 - (b) Then Amended and Restated Supplemental Agreement (**SA**).

42. There is no material difference in the provisions of the Articles and the SA in relation to the redemption of shares, but if there was, the provisions of the Articles are stated to prevail.

Outline of the redemption provisions:

43. Pursuant to Article 9(i), Preferred Shares (which include the Series A, B and C shares of the Redeeming Shareholders) are redeemable in certain circumstances, including where the Company does not conduct IPO on or prior to 31 December 2023 (**IPO Redemption Trigger**).
44. The Articles do not contain provisions enabling the Company to suspend the redemption of its shares.
45. Article 9(i) contains the following additional redemption mechanics:
- (a) The redemption price (**Redemption Price**) for each Preferred Share is the sum of (i) one hundred and fifty percent (150%) of the Applicable Original Issue Price of such Preferred Share and (ii) any declared and unpaid dividends on such Preferred Share compounded annually.
 - (b) The shares are to be redeemed prior to the sixtieth (60th) "Business Day"² after a Redemption Request (**Redemption Closing**) out of legally available funds.
46. Pursuant to Article 9(ii):
- (a) At the Redemption Closing the Company must, from any source of assets or funds legally available therefore, redeem the Preferred Shares by paying the applicable Redemption Price.
 - (b) From and after the Redemption Closing, if the Company makes the Redemption Price available to a holder of a Preferred Share to be redeemed at such Redemption Closing, all rights of the holder of such Preferred Share (except the right to receive the Redemption Price therefor) will cease with respect to such Preferred Share, and such Preferred Share will not thereafter be transferred on

² The term "Business Day" is defined in Article 1 as meaning "a day other than Saturday, Sunday, or public holiday in PRC, Hong Kong, the United States of America and the Cayman Islands on which commercial banks are open for business in each such jurisdiction".

the books of the Company or be deemed outstanding for any purpose whatsoever.

47. Articles 9(iii), (iv) and (v) govern the scenario in which the Company has insufficient funds to pay the Redemption Price. In summary:

- (a) Legally available funds must be used to pay redemptions on the due date and in the case of an insufficiency of funds: (i) payments are to be made pro rata; (ii) the Company must issue a promissory note for any unpaid amounts (Article 9(iii)).
- (b) All assets or funds of the Company that become legally available for the redemption of shares shall immediately be used to pay the redemption payment which the Company did not pay on the date that such redemption payments were due (Article 9(iv)).

48. Article 9(v) provides:

Unpaid Shares. *Without limiting any rights of the holders of Preferred Shares and Series D Warrants which are set forth in these Articles, or are otherwise available under law, the balance of any shares subject to redemption hereunder with respect to which the Company has become obligated to pay the redemption payment but which it has not paid in full shall continue to have all the powers, designations, preferences and relative participating, optional, and other special rights (including, without limitation, rights to accrue dividends) which such shares had prior to such date, until the redemption payment has been paid in full with respect to such shares. [emphasis added]*

49. In the premises:

- (a) The Redeeming Shareholders are creditors for the Redemption Debt; and
- (b) The Articles expressly preserve all shareholder rights in respect of unpaid redeemed shares until payment is received in full. As such, the Redeeming Shareholders are shareholders of the Company.

Conditions for Redemption:

50. As the Company did not conduct an IPO by 31 December 31 2023 (or at all), the IPO Redemption Trigger in Article 9(i)(i) has occurred. The Preferred Shares became redeemable at the option of the Preferred Shareholders. The Redeeming Shareholders exercised their right to redeem.
51. Furthermore, a number of additional circumstances have occurred entitling Preferred Shareholders to redeem (**Corporate Governance Breaches**):
- (a) The subsidiary boards do not mirror the Cayman board structure. Investor Directors have not been appointed to the subsidiary boards.
 - (b) The Company has failed to comply with the requirement for quarterly board meetings.
 - (c) There have been unauthorized changes to the VIE structure. The approved VIE agreements previously included Ms Dong Ruonan (Mr Wang's spouse), who has since departed with Mr Wang (per a separation agreement). Subsequent changes to both shareholding structure and VIE agreements of Guangzhou Sequoia Database Software Co., Ltd. (formerly Shenzhen Sequoia Database Software Co., Ltd.) were made without required Investor Director and shareholder approvals.
 - (d) Changes to domestic entity board composition have been made without Investor Director approval.
 - (e) The Company has failed to provide timely financial reports, including the 2024 reports which remain outstanding.
 - (f) Key personnel have remained outside of China choosing not to directly manage the Company, engage with customers, or meet with employees in person.
 - (g) In summary, the Company has repeatedly bypassed essential corporate governance processes, including timely notifications, regular board meetings, proper resolutions for the board and shareholders, adherence to information rights, and seeking shareholder approvals.

Redemption Notices:

52. The following redemption notices (**Redemption Notices**) were issued to the Company:
- (a) Redemption request from the Petitioner to the Company dated 15 October 2024 in respect of 3,615,384 Series C1 Preferred Shares.
 - (b) Redemption request from QVP and QMD to the Company dated 27 September 2024 in respect of:
 - (i) For QVP: 2,665,828 Series A Preferred Shares, 610,197 Series B Preferred Shares and 109,523 Series C1-A Preferred Shares; and
 - (ii) For QMD: 84,172 Series A Preferred Shares, 19,267 Series B Preferred Shares and 3,348 Series C1-A Preferred Shares.
 - (c) Redemption request from DVC and DVII to the Company dated 30 October 2024 in respect of:
 - (i) For DVC: 2,105,209 Series B Preferred Shares and 103,052 Series C1-A Preferred Shares; and
 - (ii) For DVII: 202,827 Series B Preferred Shares and 9,929 Series C1-A Preferred Shares.

53. The Company has acknowledged receipt of the Redemption Notices.

Conclusion:

54. The Company did not conduct an IPO by 31 December 2023 (or at all).
55. The Redeeming Shareholders issued valid Redemption Notices to the Company.
56. The Company is contractually obliged to pay the Redemption Debt and has failed to do so.
57. If the Company had insufficient assets or funds legally available to pay the Redemption Price in full on the date of the Redemption Closing, it should have paid such sums as were legally available and issued a promissory note for the balance (Article 9(iii)).

58. As assets or funds became legally available to pay the Redemptions, such sums should have been paid immediately (Article 9(iv)). No sum whatsoever has been paid.

Discovery of the strike off

59. On 17 April 2025, the Redeeming Shareholders' Cayman Islands legal counsel, Appleby Global, wrote to the Company:
- (a) Appleby noted that they had been instructed to review the operations, affairs and conduct of the Company, its service providers and its directors. They further noted that in the course of their review, a company search was conducted and it was discovered that:
 - (i) Vistra had resigned; and
 - (ii) the Company was due to be struck off the Register on 30 April 2025.
 - (b) Appleby noted that the Company was in breach of its statutory obligation to maintain a registered office in the Cayman Islands and the Company does not have an address for service of Court process and other documents.
 - (c) Appleby stated that their clients require a detailed, immediate explanation from the Company's Founder Directors about this state of affairs. They further stated that absent a compelling response and receipt of a step-plan and timeline for the regularisation of the Company's affairs, the Redeeming Shareholders reserved the right to take such steps as may be necessary to protect their interests in the Company, including without limitation, applying to this honourable Court for appropriate orders.
 - (d) Appleby asked for an address at which the Company may be served with Court process and forms under the Cayman Islands Companies Act.
60. The Company responded to the letter from Appleby by way of an email to the Investor Directors dated 22 April 2025:
- (a) The email states that, " ... Vistra the registered service provider requires supplemental due diligence materials from the shareholders in order to complete the annual filing", while also stating that, "... the registered agent has resigned, leaving the Company without a valid address for service of legal documents and at risk of involuntary strike-off".

- (b) The email refers to an earlier email from a representative of the Company to the Redeeming Shareholders dated 26 December 2023 in which certain KYC information was requested. The email states that, "... *the Company subsequently contacted another registered service provider with lower annual filing requirements*" and noted that on 30 October 2024, the Company requested certain KYC documents from representatives of the Redeeming Shareholders. The email noted that three Redeeming Shareholders had provided KYC information while the others had not.
61. The email of 22 April 2025 was the first time the Redeeming Shareholders were notified that Vistra had resigned, although the email conspicuously does not state when the resignation occurred. The email did not nominate an address for service of documents on the Company as Appleby had requested, nor did it address what steps the Company would take to avoid being struck off.
62. The CEO should have convened a board meeting to address these issues in a timely manner but did not do so.
63. On 7 May 2025, Appleby responded to the email of 22 April 2025, making the same points as set out in paragraph 60 (above):
- (a) Appleby noted the seriousness of the situation and encouraged the Company to engage Cayman Islands legal counsel. Appleby urged the Company's executive management not to simply stand by and allow the Company to be struck off. Appleby provided KYC information and noted that given certain Redeeming Shareholders were Cayman private funds registered with the CIMA, only a CORIS search was required.
- (b) The letter raised the issue of the Redemption Notices. As stated above, it is averred by the Petitioner that the real reason the Founder Directors have not kept the Company in good standing is because they are well aware that the Redeeming Shareholders intended to pursue the Redemption Debt and because the Company is insolvent.
- (c) Appleby enclosed the Statutory Demands with the letter. The letter stated that the Statutory Demands would be served as soon as the Company is returned to good standing. The letter stated that if the Company is not returned to good standing, the Redeeming Shareholders would take steps to restore the Company and wind it up.

64. The Company responded to Appleby by way of a letter from Conyers Dill & Pearman dated 13 May 2025:
- (a) The letter states that the Company has engaged a new registered office provider to initiate restoration proceedings.
 - (b) The letter asks whether the Redeeming Shareholders, “... *intend to proceed as shareholder or creditors*” and asserts that if they wish to remain as shareholders they must withdraw their redemption requests. The letter states that the Company has “limited resources” but that it would nevertheless oppose any winding up petition.
65. The letter of 13 May 2025, fails to address the Company’s insolvency, its mismanagement or its inability to conduct an IPO. The letter does not identify the grounds upon which it has any basis to oppose the making of a winding up order.
66. More fundamentally, the Petitioner understands that a registered office service provider has no standing to initiate restoration proceedings under the Companies Act.
67. On 21 May 2025, the Company sent an email to Mr Xiaochuan Qiu (the representative of QVP and QMD and the Investor Director for the Series C Preferred Shareholders) and Mr Shan Liang (the sole director of the Petitioner), requesting provision of two outstanding KYC documents. The email indicated that these were the only KYC documents that remained outstanding. The requested documents were provided to the Company on the same day.
68. A board meeting of the directors of the Company was held on 29 May 2025. During the meeting the Company’s legal counsel said that the Redeeming Shareholders’ shares had been redeemed such that the Redeeming Shareholders were now creditors of the Company.

Grounds for restoration to the Register

69. At the time of filing this Petition, the Company:
- (a) remains struck off the Register;
 - (b) remains indebted to the Petitioner in the sum of US\$23,999,822.84 and the Supporting Creditors in the sum of US\$18,750,055, totalling US\$42,749,877.

70. The Petitioner, a creditor of the Company, is aggrieved by the striking off of the Company.
71. The Company was, at the time of striking off, carrying on business or in operation.
72. Further and in the alternative, it is just that the Company be restored to the Register so that the Company may be wound up and a duly appointed liquidator may recover the assets of the Company (and the Group) to meet the Company's redemption obligations.

Grounds for winding up

The Company is unable to pay its debts

73. The Company is plainly insolvent.
74. The Company failed to pay the Redemption Proceeds to the Petitioner and the Supporting Creditors. It admittedly has insufficient assets or funds to meet the arbitration claims of the Series D Shareholders / Warrant holders.

Justifiable loss of confidence in the management of the Company

75. Management of the Company failed to prevent the Company from being struck off the Register at a time when the Company continued to be the holding company for a large corporate group. There is no good explanation for this failure. Late provision of the KYC information is a grossly inadequate excuse.
76. The Company is not succeeding financially and it failed to conduct an IPO within the timeframe agreed upon. The CEO and the Management Team have not proposed any credible solution to these issues. The CEO and the Management Team have failed to provide timely notifications, hold regular board meetings, prepare proper resolutions for the board and shareholders, adhere to investor information rights or seek shareholder approvals when required. The CEO and the Management Team have failed to rectify these issues despite repeated requests by the Redeeming Shareholders. The Redeeming Shareholders have justifiably lost confidence in the CEO and the Management Team, both due to the management failures identified herein, and because of their allowing the Company to be struck off.
77. It is averred that the CEO and the Management Team wilfully permitted the Company to be struck off in order to frustrate the Redeeming Shareholders from serving the Statutory Demands and recovering the significant Redemption Debt owed to them.

78. The CEO and the Management Team failed to prevent the Company being struck off, and have failed to apply for its restoration, despite requests by the Redeeming Shareholders that they do so.
79. In all the circumstances, there is a serious lack of probity on the part of the Founding Directors, who control the board of the Company.
80. It is unjust that the Company be permitted to avoid its responsibilities to maintain a registered office, to pay the Redemption Debt or to accept service of the Statutory Demands at its registered office.
81. It is unjust that the Company has not expeditiously applied for restoration.

Relief sought

82. In the premises:
 - (a) the Petitioner is aggrieved by the Company having been struck off;
 - (b) the Company was carrying on business and in operation at the time it was struck off and it continues to do so;
 - (c) it is just that the Company be restored to the Register; and
 - (d) at the time of its restoration:
 - (i) the Company be wound up on the ground that it is unable to pay its debts;
 - (ii) further and in the alternative, it is just and equitable that the Company be wound up under the provisions of the Companies Act.

The petitioner therefore prays that:

1. the Company be restored to the register of companies;
2. the Company be wound up by the Court pursuant to the Companies Act;
3. Declan Magennis of Kroll (Cayman) Ltd. and Shaw Hoong TAI of Kroll (Hong Kong) Limited be appointed as Joint Official Liquidators (**JOLs**) of the Company;

4. such other order or directions may be made as the Court thinks fit.

Dated this 4th day of July 2025

Filed this 4th day of July 2025



APPLEBY (CAYMAN) LTD.

This petition is intended to be served upon:

1. The Registrar of Companies
2. The Company at its last known registered office and at the offices of Conyers Dill & Pearman in the Cayman Islands.

THIS PETITION was filed by Appleby (Cayman) Ltd., of 9th Floor, 60 Nexus Way, PO Box 190, Camana Bay, Grand Cayman KY1-1104, Cayman Islands (Ref. ASJ/WP/442550.0003) Attorneys-at-Law for the Petitioner, whose address for service is that of its said attorneys.