



COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

FSD CAUSE NO. OF 2025 ()

IN THE MATTER OF THE COMPANIES LAW (2025 REVISION)

AND IN THE MATTER OF GREENROCK CORP

WINDING UP PETITION

TO: THE GRAND COURT OF THE CAYMAN ISLANDS

The humble petition of Simmons & Simmons LLP (the “**Petitioner**”), a limited liability partnership established in the United Kingdom with its contact address at CityPoint, 1 Ropemaker St, London EC2Y 9SS shows that:-

Background

1. Greenrock Corp (the “**Company**”) is a company incorporated under the laws of the Cayman Islands on 4 May 2023 with registered number 399967. Its current registered address is Greenrock Corp c/o Ogier Global Cayman Ltd, 89 Nexus Way, Camana Bay, Grand Cayman, Cayman Islands.
2. The Company is an exempted limited company established in the Cayman Islands. The Petitioner understands that it was set up as an independent energy producer and to deal with all related transactions and advice.
3. The Petitioner is an English law firm providing advice on the laws of England & Wales.

Debt owed to Petitioner

This **WINDING UP PETITION** was filed by Travers Thorp Alberga, attorneys for the Petitioner, whose address for service is PO Box 472, 2nd Floor Harbour Place, 103 S. Church Street, Grand Cayman, KY1-1106, Cayman Islands (Ref: M1477-003)

4. The Company engaged the Petitioner on 4 July 2023 under an Engagement Letter for the provision of legal services. Between the 4 July 2023 and the 11 July 2024 the Petitioner provided the legal services and advice to the Company and raised invoices totalling £534,056.77.
5. The invoices were not paid and no sums were received to settle any of the legal fees despite repeated chasers being sent by the Petitioner to the Company from October 2024 until January 2025.
6. In accordance with the terms of the Engagement Letter, the Petitioner issued proceedings in the English Courts seeking recovery of the sums that had been unpaid. The claim was issued on 6 March 2025 claiming damages for the unpaid invoices, interest and costs.
7. On 15 April 2025 the claim was served on the Company in the Cayman Islands.
8. No acknowledgment of service or defence was filed by the Company.
9. The Petitioner accordingly applied for Default Judgment from the English Courts on 22 May 2025.
10. Judgment was entered for the sum of £599,949.87 (the “**Judgment Debt**”) by the English Court on 15 July 2025 and an Order dated 15 July 2025 was accordingly sealed.

Demand for repayment

11. The Company failed to satisfy the Judgment Debt and a statutory demand in respect thereof was served on the Company on 6 August 2025 (the “**Demand**”). The Demand required the Company to pay to the Petitioner the Judgment Debt of £599,949.87 plus interest calculated in accordance with section 17 of the Judgments Act 1838 (JA 1838) and the Judgment Debts (Rate of Interest) Order 1993 in England and Wales, meaning a total Debt of £606,130.18 as at 5 August 2025.
12. The Demand was served on the Company at its registered office and a delivery receipt duly signed on the date of service.
13. Despite the Company having never disputed the validity of the Judgment Debt or that it is presently due and payable, as at the date of this Petition, which is more than 21 days following service of the Demand, the Company has failed to pay any amount of the Demand to the

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Petitioner or to secure or compound it to the Petitioner's satisfaction. The Company is therefore deemed to be insolvent.

Insolvency and winding up

14. The Petitioner is thus a creditor of the Company in the amount of the Debt plus interest, which continues to accrue at a daily rate of £131.50.
15. The Petitioner accordingly presents this Petition pursuant to the Companies Act (2025 Revision) (the "**Companies Act**") on the grounds that:
 - a. The Company is insolvent on the basis that:
 - i. the Company was validly served with the Demand and has failed to satisfy it within 21 days and is therefore deemed to be unable to pay its debts by operation of section 93(a) of the Companies Act; and/or
 - ii. the debt is presently due and payable, which the Company has not disputed despite being given numerous opportunities, and has in fact not been paid by the Company, from which it may be inferred that the Company is unable to pay its debts pursuant to section 92(d) of the Companies Act;
 - b. Since the Company is insolvent (on either or both of the above bases), the Petitioner is entitled to a winding up order *ex debito justitiae*.
 - c. It is appropriate for the Court to order the Company to be wound up and to appoint liquidators, which will recover the most value for the Company's creditors (including the Petitioner) and is therefore in the creditors' best interests.
16. The Petitioner nominates Mr Jason Robinson and Ms Neema Griffin, both of Teneo, to be appointed as joint official liquidators of the Company.

YOUR PETITIONER THEREFORE HUMBLY PRAYS THAT:-

1. The Company be wound up in accordance with section 92(d) of the Companies Act.

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2. Mr Jason Robinson and Ms Neema Griffin of Ground Floor, Harbour Place 103 South Church Street P.O. Box 10245, George Town Grand Cayman, KY1-1003 Cayman Islands be appointed as joint official liquidators ("**Liquidators**") of the Company.
3. The Liquidators shall not be required to give security for their appointment.
4. The Liquidators shall have the power to act jointly and severally in their capacity as joint liquidators of the Company.
5. No disposition of the Company's property by or with the authority of the Liquidators carrying out their duties and function and in exercise of their powers shall be voided by virtue of section 99 of the Act.
6. Subject to section 109(2) of the Companies Act and the Insolvency Practitioners Regulations 2008 (as amended), the Liquidators be authorised to render and pay invoices out of the assets of the Company for their own remuneration.
7. The Liquidators be at liberty to meet all disbursements reasonably included in connection with the performance of their duties and, for the avoidance of doubt, all such payments shall be made as and when they fall due out of the assets of the Company as an expense of the liquidation.
8. The Petitioner's costs relating to the Petition be paid out of the assets of the Company as an expense of the liquidation.
9. Such further or other relief be granted as the Court deems appropriate.

AND your Petitioner will ever pray etc.

Dated this 1st day of October 2025



TRAVERS THORP ALBERGA
Attorneys for the Petitioner

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NOTE: It is intended that this Petition be served on the Company.

NOTICE OF HEARING

TAKE NOTICE THAT the hearing of this Petition will take place at the Law Courts, George Town, Grand Cayman on 2025 at am.

Any correspondence or communication with the Court relating 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).

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