

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 15
Quintis Limited <i>et al.</i> ¹)	Case No. 18-12739 (MG)
Debtors in a Foreign Proceeding.)	

**NOTICE OF FILING AND HEARING ON VERIFIED PETITION UNDER
CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on September 12, 2018, Richard Tucker, the duly authorized foreign representative (the “**Foreign Representative**”) of the above captioned debtors (the “**Foreign Debtors**”), which are the subject of proceedings (the “**Australian Proceeding**”) in relation to the scheme of arrangement of the Foreign Debtors (the “**Scheme**”) pursuant to the Corporations Act 2001 (Commonwealth of Australia) (the “**Corporations Act**”) currently pending before Federal Court of Australia, New South Wales District Registry (in Sydney, Australia) (the “**Australian Court**”), filed the *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* (together with the Form of Voluntary Petitions filed concurrently herewith, the “**Verified Petition**”), pursuant to chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”), with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Verified Petition seeks the entry of an order (a) finding that (i) each of the Foreign Debtors is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the Australian Proceeding is a “foreign main proceeding” within the meaning of section 1502 of the Bankruptcy Code, (iii) the Foreign Representative satisfies the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, (iv) the Verified Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code, (b) granting recognition of the Australian Proceeding as a foreign main proceeding under sections 1517 and 1520 of the Bankruptcy Code, and (c) granting certain additional relief under sections 1507 and 1521 of the Bankruptcy Code, including (i) giving full force and effect in the United States to the Scheme, including the recognition and enforcement of releases contained therein, (ii) permanently enjoining all parties from taking any action inconsistent with the restructuring effected by the Scheme and the Deed of Company Arrangement dated June 29, 2018, in the United States, (iii) waiving the 14-day stay of effectiveness of the

¹ The Foreign Debtors in these chapter 15 cases (the “**Chapter 15 Cases**”) are Quintis, Sandalwood Properties Ltd, Quintis Forestry Limited, Quintis Leasing Pty Ltd, Arwon Finance Pty Ltd, Mt Romance Holdings Pty Ltd, Mt Romance Australia Pty Ltd and Australian Sandalwood Oil Co. Pty Ltd, each “(Subject to Deed of Company Arrangement) (Receivers and Managers Appointed).”

Recognition Order, and (iv) granting related relief as proper under sections 1507 and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing (the “**Recognition Hearing**”) to consider the relief requested in the Verified Petition for **2:00 p.m. (Eastern time) on October 10, 2018** in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE copies of the Verified Petition and all documents filed in the Chapter 15 Case are available to parties-in-interest (i) on the Court’s Electronic Case Filing System, which can be accessed from the Court’s website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document), or (ii) upon written request to the Foreign Representative’s United States counsel addressed to: Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian and David Kazlow).

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition or the relief requested therein must do so in writing and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis therefor with specificity and the nature and extent of the respondent’s claims against the Foreign Debtors. Such responses or objections must be filed electronically with the Court on the Court’s electronic case filing system in accordance with and except as provided in General Order M-399 and the Court’s Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court’s website at <http://www.nysb.uscourts.gov>) and otherwise, on a compact disc (CD), preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, which CD shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any response or objection shall be sent to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon counsel for the Foreign Representative, Reed Smith LLP, 599 Lexington Avenue, New York, New York 10022 (Attn: Aaron Javian and David Kazlow), so as to be actually **received on or before** October 3, 2018 at 4:00 p.m. (**Eastern time**).

PLEASE TAKE FURTHER NOTICE that the hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that at such hearing the Court may order the scheduling of a case management conference to consider the efficient administration of these Chapter 15 Cases.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Verified Petition or the relief requested therein must appear at the Recognition Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Verified Petition without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

New York, New York
Dated: September 13, 2018

Respectfully submitted,

/s/ Aaron Javian

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