


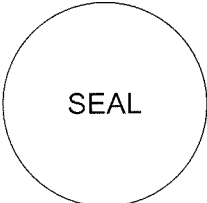


**Claim Form
(CPR Part 8)**

In the High Court Of Justice Chancery Division Royal Courts of Justice		 28 Jul 2017 COMPANIES COURT
Claim no.	CR-2017-001386	
Fee Account no.		
Help with Fees - Ref no. (if applicable)	HWF - [] [] [] [] [] [] [] [] [] []	CR-2017-001386

Claimant s

QBE INSURANCE (EUROPE) LIMITED (registered number 01761561), a company incorporated in England and Wales, whose registered office is at Plantation Place, 30 Fenchurch Street, London, EC3M 3BD (the "**First Claimant**")



and

MOORGATE INSURANCE COMPANY LIMITED (registered number 00147862), a company incorporated in England and Wales, whose registered office is at 4th Floor, St Clare House, 30-33 Minories, London, EC3N 1DD (the "**Second Claimant**")

and

BOTHNIA INTERNATIONAL INSURANCE COMPANY LIMITED, a company incorporated in Finland, whose head office is at Eerikinkatu 27, FI-00180 Helsinki, Finland (the "**Third Claimant**").

Defendant(s)

Not applicable

Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim (see also overleaf)

1. This is an application under section 107 of the Financial Services and Markets Act 2000 ("**FSMA**") for an order sanctioning an insurance business transfer scheme.

2. The First Claimant is an authorised person as defined in section 31(1)(a) of FSMA, with permission, inter alia, to effect and carry out contracts of general insurance (both direct and reinsurance) in the United Kingdom under classes of business 1 to 18 set out in Part I of Schedule 1 to the Regulated Activities

Defendant's name and address

N/A

	£
Court fee	280.00
Legal representative's costs	
Issue date	

Order 2001 (the "RAO").

3. The Second Claimant is an authorised person as defined in section 31(1)(a) of FSMA, with permission to, inter alia, carry out contracts of general insurance (which includes reinsurance) in the UK under classes of business 1 to 18 set out in Part I of Schedule 1 to the RAO.

Details of claim (continued)

4. The Third Claimant is authorised by the Financial Supervisory Authority of Finland to carry out contracts of general insurance (both direct and reinsurance) in Finland under classes of business 1 to 17, and in the UK under classes of business 1 to 9 and 11 to 17, set out in Part A of Annex I of Directive 2009/138/EC, but excluding certain insurance business under classes 1 and 10 in accordance with the Finnish statutory Motor Liability Insurance Act (275/59), certain insurance business under class 13 in accordance with the Finnish statutory Patient Injuries Act (585/86) and the Finnish Nuclear Liability Act (484/72) and certain insurance business in accordance with the Finnish Occupational Accidents, Injuries and Diseases Act (459/2015).

5. The Claimants seek the sanction of the Court under Part VII of FSMA to an insurance business transfer scheme (the "**Scheme**") for the transfer of part of the reinsurance business of the First Claimant and all of the reinsurance business of the Second Claimant, in each case together with related reinsurance agreements and as more particularly specified in the document detailing the Scheme (the "**Transfer Document**"), to the Third Claimant.

6. Witness statements from Simon William Hawkins (on behalf of the First Claimant) and Rhydian Williams (on behalf of the Second and Third Claimants) are filed in support of this Claim Form.

7. Copies of the near final form Transfer Document, the draft Final Order and the draft Order for Directions are annexed to this Claim Form.

8. The Claimants hereby apply for:

(a) an Order for the sanction of the Scheme under section 111(1) of FSMA for the transfer of part of the reinsurance business of the First Claimant and all of the reinsurance business of the Second Claimant, as more particularly specified in the Transfer Document, to the third Claimant;

(b) Orders under section 112 of FSMA making ancillary provision for implementing the Scheme as detailed in the draft Final Order;

(c) an Order for directions in respect of the proposed Scheme as detailed in the draft Order for Directions; and

(d) such other Order(s) as the Court may deem appropriate.

Part 8 of the Civil Procedure Rules ("**CPR**") applies to this claim which is made pursuant to CPR Pt49, Practice Direction 49A paragraph 5(1).

Claim no.

CR-2017-001386

Statement of Truth

~~XXXXXX~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name Matthew Griffith

Name of claimant's legal representative's firm Reynolds Porter Chamberlain LLP

signed 

position or office held Partner

(if signing on behalf of firm or company)

~~XXXXXX~~ ~~XXXXXX~~ ~~XXXXXX~~

(Legal representative's solicitor)

**delete as appropriate*

Reynolds Porter Chamberlain LLP

Tower Bridge House
St Katharines Way
London
London
E1W 1AA

600 London\City
020 3060 7000

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.