

IN THE SUPREME COURT OF WESTERN AUSTRALIA
HELD AT PERTH

COR 172 of 2025

IN THE MATTER OF NORTHERN IRON PTY LTD (SUBJECT TO DEED OF
COMPANY ARRANGEMENT) (RECEIVERS AND MANAGERS
APPOINTED) ACN 646 998 772

EX PARTE:

**HAYDEN LEIGH WHITE AND DANIEL HILLSTON WOODHOUSE IN THEIR
CAPACITIES AS JOINT AND SEVERAL RECEIVERS AND MANAGERS
OF NORTHERN IRON PTY LTD (SUBJECT TO DEED OF COMPANY
ARRANGEMENT) (RECEIVERS AND MANAGERS APPOINTED) ACN 646
998 772**

Plaintiffs

DEED ADMINISTRATORS' OUTLINE OF SUBMISSIONS

Date of Document:	2 December 2025	
Filed on behalf of	Interested Party - Stuart George Reid and Samantha Rangika Sellahewa in their capacities as joint and several deed administrators of Northern Iron Pty Ltd (Subject to Deed of Company Arrangement) (Receivers and Managers Appointed) ACN 646 998 772	
Date of filing	2 December 2025	
Prepared by	Finlaysons L7, 43 Franklin Street Adelaide SA 5000	Telephone: (08) 8235 7529 Reference: 426545/00015

1. These are the submissions of Stuart George Reid and Samantha Rangika Sellahewa (**Deed Administrators**) in their capacities as joint and several deed administrators of Northern Iron Pty Ltd (Subject to Deed of Company Arrangement) (Receivers and Managers Appointed) ACN 646 998 772 (**Northern Iron**) in relation to the Plaintiffs' Originating Process filed on 4 November 2025, seeking orders pursuant to section 444GA of the *Corporations Act* to transfer all of the shares issued in Northern Iron to AG-River Energy Pty Ltd (**AG-River**), the proponent of the deed of company arrangement executed on 28 October 2025 (**DOCA**).

FILED

2 DEC 2025

Via eLodgment
**CENTRAL OFFICE
SUPREME COURT**

2. The Deed Administrators respectfully adopt the submissions of the Plaintiffs dated 1 December 2025, support the submissions made and respectfully submit that orders should be made to facilitate the transfer of all of Northern Iron's shares to AG-River to enable effectuation of the DOCA.

A handwritten signature in blue ink, appearing to read "Finlayson", is positioned above the printed name.

Finlaysons

Lawyers for the Deed Administrators