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4 November 2025

To:

Principal Registrar
Supreme Court Registry and Central Office
Level 11, David Malcom Justice Centre
28 Barrack Street
PERTH WA 6000

Copy to:

Associate to the Honourable Justice Hill
Supreme Court Registry and Central Office
Level 11, David Malcom Justice Centre
28 Barrack Street
PERTH WA 6000

Dear Principal Registrar

**IN THE MATTER OF NORTHERN IRON PTY LTD (SUBJECT TO DEED
OF COMPANY ARRANGEMENT) (RECEIVERS AND MANAGERS
APPOINTED) ACN 646 998 772 – COR 172 of 2025**

We act for Hayden Leigh White and Daniel Hillston Woodhouse in their capacity 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 (**Northern Iron**).

We refer to the originating process and supporting affidavits of Hayden Leigh White filed in the above proceedings on 4 November 2025 seeking orders under section 444GA of the *Corporations Act 2001* (Cth) (**Application**).

Certificate of Solicitor on Urgent Application

We certify that:

1. The Application is of such an urgent nature that arrangements have been made for a directions hearing to occur on **Friday, 7 November 2025 at 9,15am** before the Honourable Justice Hill, with a final hearing sought for on or after 8 December 2025.
2. The documents comprising the Application necessary for the Judge (or Master) to make an order in the terms sought in the Application have been filed with the Court, and it is anticipated that further materials will

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Via eLodgment
**CENTRAL OFFICE
SUPREME COURT**

also be filed ahead of the final hearing in accordance with the minute of proposed orders filed.

3. The urgency of the Application arises due to the terms of the deed of company agreement (**DOCA**) which was entered into on 28 October 2025. Effectuation of the DOCA cannot take place without the final conditions precedent being satisfied, which includes and contemplates the matters the subject of the Application. The final conditions precedent are required to be satisfied by 5 December 2025 (subject to any extensions agreed by the parties to the DOCA).
4. We have considered the need to give notice or to serve any other party or parties. We intend to serve the Application on the deed administrators of Northern Iron (**Deed Administrators**), the deed proponent AG-River Energy Pty Ltd (**AG River**), ASIC and the creditors and shareholders of Northern Iron. It is anticipated that the Deed Administrators and AG River will be joined as interested parties to the Application.
5. The estimated length of the directions hearings proposed are approximately 15 mins each, and the estimated length of the final hearing proposed is approximately 30 mins (if unopposed).

Please do not hesitate to contact us if you have any queries in respect of the above.

Yours sincerely



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