DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Quintis (Australia) Pty Ltd (Receivers and Managers Appointed) (Administrators Appointed) (ACN 626 970 821)

First Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Sandalwood Properties Ltd (formerly known as T.F.S. Properties Ltd) (Receivers and Managers Appointed) (Administrators Appointed) (ACN 093 330 977)

Second Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Quintis Forestry Pty Ltd (formerly known as Tropical Forestry Services Ltd) (Receivers and Managers Appointed) (Administrators Appointed) (ACN 080 139 966)

Third Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Arwon Finance Pty Ltd (Receivers and Managers Appointed) (Administrators Appointed) (ACN 072 486 643)

Fourth Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Quintis Leasing Pty Ltd (formerly known as T.F.S. Leasing Pty Ltd) (Receivers and Managers Appointed) (In Liquidation) (ACN 080 978 721)

Fifth Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Fieldpark Pty Ltd (Receivers and Managers Appointed) (Administrators Appointed) (ACN 113 440 841)

Sixth Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Mt Ron ance Holdings Pty Ltd (Receivers and Managers Appointed) (ACN 115 659 606)

Seventh Plaintiff



-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of Quintis Sandalwood Pty Ltd (formerly known as Mt Romance Australia Pty Ltd) (Receivers and Managers Appointed) (Administrators Appointed) (ACN 060 122 698)

Eighth Plaintiff

-and-

DANIEL WOODHOUSE, HAYDEN WHITE and JOHN PARK in their capacity as joint and several receivers and managers of About Time We Met Pty Ltd (formerly known as Australia Sandalwood Oil Co. Pty Ltd) (Receivers and Managers Appointed) (Administrators Appointed) (ACN 088 257 498)

Ninth Plaintiff

AND

PAUL BEGLEY, SHIRLEY SPENCER AS EXECUTOR OF THE DECEASED ESTATE OF COLIN SPENCER, GEGORY BRUDENELL, AND OTHERS NAMED IN THE SCHEDULE

Defendants

## SEVENTH AFFIDAVIT OF DANIEL HILLSTON WOODHOUSE IN SUPPORT OF APPLICATION FOR DECLARATORY RELIEF AND FOR DIRECTIONS PURSUANT TO SECTION 424 OF THE CORPORATIONS ACT

## **AFFIRMED ON 27 AUGUST 2024**

**Date of Document:** 

27 August 2024

**Date of Filing:** 

**27** August 2024

Prepared By:

Clifford Chance

Email:

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235 St Georges Terrace

Ref:

22-41072831 PS / AP

Perth WA 6000

X

## **INDEX**

No	Details	Pages
DHW-55(a)	Spreadsheet listing the Quintis-Owned Land Assets of the Quintis Group Companies provided on or about 1 August 2024 (Land Spreadsheet)	5

I Daniel Hillston Woodhouse of Level 47, Central Park, 152 – 158 St Georges Terrace, Perth, WA, 6000, chartered accountant and registered liquidator affirm and say as follows:

- 1. I am a senior managing director in the corporate finance and restructuring practice of the professional services firm, FTI Consulting (Australia) Pty Ltd (FTI). I have been a registered liquidator since 2018. I have over 20 years' experience in corporate restructuring and turnaround review and advisory services.
- 2. I am one of three joint and several receivers and managers of the second to tenth plaintiffs (the Quintis Group), together with Hayden White and John Park (together, the Receivers). Messrs White and Park are also senior managing directors of FTI.
- 3. I am authorised by my fellow Receivers to make this affidavit on behalf of the Receivers.
- 4. Unless otherwise stated, this affidavit is based on my own knowledge and belief from information that I and staff members of FTI have obtained as a consequence of the Receivers' appointment to the Quintis Group, which I believe to be true.
- 5. Unless otherwise stated capitalised terms in this affidavit have the same meaning as in my sixth Affidavit affirmed on 21 August 2024 (Sixth Woodhouse Affidavit).
- 6. I make this short corrective affidavit in support of the plaintiffs' application for declaratory relief and for directions under s. 424 of the Corporations Act 2001 (Cth) (Corporations Act) in the interlocutory process filed on 21 August 2024 (the Application). I wish to correct a minor issue with two of the attachments to the Sixth Woodhouse Affidavit, namely DWH-55 and DHW-59(a), as set out below.

AD

- 7. First, paragraphs 23 and 25 of the Sixth Woodhouse Affidavit refer to rows 38 to 42 of a spreadsheet of Quintis-Owned Land Assets appearing at DHW-55. However, the copy of the spreadsheet attached to the Sixth Affidavit does not show the row numbers in the table. Attached and marked **DHW-55(a)** is a replacement spreadsheet which shows the row numbers. The contents of the new DHW-55(a) are otherwise the same as the contents of DHW-55.
- 8. Secondly, the document marked **DHW-59(a)**, which is titled "Lease No. 717117727 between SPL (as lessor) and Quintis Leasing (as lessee) dated on or about 19 February 2016, for Lot 13 of Survey Plan 195138 and Lot 2 of Survey Plan 262859", unintentionally appears twice in the attachments to the Sixth Woodhouse Affidavit, namely it correctly appears at pages 797 to 816 as DHW-59(a), and it is incorrectly duplicated at pages 565 to 584 as part of **DHW-57(a)**. It should only appear once as DHW-59(a), and DHW-57(a) should comprise only pages 585 to 629.

Affirmed by D	aniel I	Hillston	)
Woodhouse at	Perth,	Western	)
Australia, on	27	August 2024	)

Before me:

[Signature of deponent]

Witness Signature:

Witness name: MITCHELL HUTCHINSON

An Australian legal practitioner who has held a practising certificate for at least 2 years and who holds a current practising certificate

7.33			137.86 2.71	13									Lot 6 on Plan 15631, Volume 1746, Folio 292 (Title Reference 1746/292)	Owned (Qin)	Lot 6	Chapmans	Kununurra	1 WA	41
	33.17												Lot 2 of SURVEY PLAN 262859 (Title Reference 50928825)	Owned (Qin)	Lot 2	Woods	Dalbeg	0 QLD	40
	53.65												Lot 13 of SURVEY PLAN 195138 (Title Reference 50643972)	Owned (Qin)	Lot 13	Woods	Dalbeg	9 QLD	39
14		12.33											Lot 73 of CROWN PLAN GS442 (Title Reference 21226107)	Owned (Qin)	Lot 73	Mugica	Dalbeg	8 QLD	38
							10	29.45					Lot 80 of CROWN PLAN GS304 (21211137)	Owned (Qin)	Lot 80	Sexton	Millaroo	7 QLD	37
					-		6	21.91					Lot 29 of CROWN PLAN GS332 (Title Reference 50992489)	Owned (Qin)	Lot 29	Granshaw	Dalbeg	QLD OLD	36
							5	21.73					Lot 65 of CROWN PLAN GS620 (Title Reference 21123015)	Owned (Qin)	Lot 65	Ferguson	Millaroo	5 QLD	35
							ω	20.48					Lot 20 of CROWN PLAN GS324 (Title Reference 50484981)	Owned (Qin)	Lot 20	Granshaw	Dalbeg	4 QLD	34
							ω	18.00					Lot 76 of CROWN PLAN GS307 (Title Reference 50236751)	Owned (Qin)	Lot 76	Ferguson	Millaroo	3 QLD	33
							ω	15.90					Lot 18 of CROWN PLAN GS314 (Title Reference 50484885)	Owned (Qin)	Lot 18	Granshaw	Dalbeg	2 QLD	32
							4	15.88					Lot 26 of CROWN PLAN GS314 (Title Reference 21191135)	Owned (Qin)	Lot 26	Granshaw	Dalbeg	1 QLD	31
		-					ω	11.85					Lot 86 of CROWN PLAN GS310 (Title Reference 21163147)	Owned (Qin)	Lot 86	Ferguson	Millaroo	O QLD	30
							22	11.75					Lot 22 of CROWN PLAN GS332 (Title Reference 50992488)	Owned (Qin)	Lot 22	Granshaw	Dalbeg	9 QLD	29
							2	8.96					Lot 65 of CROWN PLAN GS435 (Title Reference 21191136)	Owned (Qin)	Lot 65	Granshaw	Dalbeg	8 QLD	28
							2	8.31					Lot 75 of CROWN PLAN GS550 (Title Reference 21191135)	Owned (Qin)	Lot 75	Granshaw	Dalbeg	7 QLD	27
						9.43					Ĭ.		Lot 121 of CROWN PLAN GS453 (Title Reference 21451011)	Owned (Qin)	Lot 121	Windsor	Millaroo	G QLD	26
					2	8.25 2							Lot 123 of CROWN PLAN GS453 (Title Reference 21202052)	Owned (Qin)	Lot 123	Windsor	Millaroo	5 QLD	25
					-	13.90 4	_						Lot 10 of CROWN PLAN GS325 (Title Reference 21211099)	Owned (Qin)	Lot 10	Vener	Dalbeg	4 QLD	24
					-	13.38 4							Lot 9 of CROWN PLAN GS325 (Title Reference 21191042)	Owned (Qin)	Lot 9	Vener	Dalbeg	3 QLD	23
						8.38							Lot 85 of CROWN PLAN GS736 (Title Reference 21060194)	Owned (Qin)	Lot 85	Vener	Dalbeg	2 QLD	22
						7.98 3							Lot 70 of CROWN PLAN GS436 (Title Reference 21272097)	Owned (Qin)	Lot 70	Vener	Dalbeg	1 QLD	21
						7.89 3						7.	Lot 5 of CROWN PLAN GS893 (Title Reference 21272087)	Owned (Qin)	Lot 5	Vener	Dalbeg	O QLD	20
					G	18.13 5							Lot 11 of CROWN PLAN GS325 (Title Reference 50987145)	Owned (Qin)	Lot 11	Trevisan	Dalbeg	9 QLD	19
					2	8.86 2							Lot 67 of CROWN PLAN GS436 (Title Reference 51077242)	Owned (Qin)	Lot 67	Trevisan	Dalbeg	8 QLD	18
						8.36 3							Lot 87 of CROWN PLAN GS735 (Title Reference 21060188)	Owned (Qin)	Lot 87	Trevisan	Dalbeg	7 QLD	17
					2	7.12 2							Lot 88 of CROWN PLAN GS735 (Title Reference 51077243)	Owned (Qin)	Lot 88	Trevisan	Dalbeg	6 QLD	16
					2	7.01 2							Lot 68 of CROWN PLAN GS436 (Title Reference 50987145)	Owned (Qin)	Lot 68	Trevisan	Dalbeg	5 QLD	15
					w	15.84 3							Lot 15 of CROWN PLAN GS282 (Title Reference 50800933)	Owned (Qin)	Lot 15	McDonald	Millaroo	4 QLD	14
					0	29.68 10							Lot 15 of CROWN PLAN GS324 (Title Reference 21544194)	Owned (Qin)	Lot 15	Cavallin	Dalbeg	3 QLD	13
						19.38 8		2					Lot 6 of SURVEY PLAN 279404 (Title Reference 51076551)	Owned (Qin)	Lot 7	Cavallin	Dalbeg	2 QLD	12
					2	8.35 2							Lot 6 of SURVEY PLAN 279404 (Title Reference 51076551)	Owned (Qin)	Lot 6	Cavallin	Dalbeg	1 QLD	11
						7.24 3							Lot 84 of CROWN PLAN GS736 (Title Reference 21141034)	Owned (Qin)	Lot 84	Cavallin	Dalbeg	0 QLD	10
					2	7.21 2							Lot 71 of CROWN PLAN GS436 (Title Reference 21565200)	Owned (Qin)	Lot 71	Cavallin	Dalbeg	9 QLD	9
						7.17 1							Lot 69 of CROWN PLAN GS436 (Title Reference 21544195)	Owned (Qin)	Lot 69	Cavallin	Dalbeg	8 QLD	00
					18			.1			1	110.60	N.T. Portion 7248 from plan(s) LTO2013/076B, Volume 862, Folio 344 (Title Reference 862/344)	Owned (Qin)	Farm E	Midway	Douglas Daly	7 NT	7
		-									4	172.15	N.T. Portion 7246 from plan(s) LTO2013/076B, Volume 862, Folio 343 (Title Reference 862/343)	Owned (Qin)	Farm C	Midway	Douglas Daly	NT 0	6
									œ	178.46	* 1		N.T. Portion 7446 from plan(s) LTO2015/068, Volume 838, Folio 316 (Title Reference 838/316)	Owned (Qin)	Lot 7446	Cadell	Douglas Daly	5 NT	5
BC 2010 14 (Special project) (Ha)	(Ha)	) TFS 2012	TFS 2008 TFS 2009 (Ha) (Ha)		=	SIO 2016 SIO 2016 Ha #		INW 2015 HI Ha	HNW 2014 F	HNW 2013 HNW 2013 HNW 2014 HNW 2015 HNW 2015 Ha # Ha # Ha # Ha #	HNW 2013	HNW 2013 Ha	Land Title Details	Land Ownership	Land	Property	Property Location	State	4
Private		stors	MIS Investors					stors	HNW Investors									ω	ω
																		- 1	2
																Owned Land	Investor Trees on Quintis Owned Land		
Т.	S	R	P Q		0	Z	_	~	٦	-	I	G	f F	Е	D	C	В	Α	