

**IN THE HIGH COURT OF JUSTICE  
BUSINESS AND PROPERTY COURTS OF  
ENGLAND AND WALES  
INSOLVENCY AND COMPANIES LIST (ChD)**

**No. 7942 of 2008  
CR-2019-[●]**

**IN THE MATTER OF LEHMAN BROTHERS INTERNATIONAL (EUROPE) (in  
administration)**

**AND IN THE MATTER OF THE INSOLVENCY ACT 1986**

**(1) RUSSELL DOWNS**

**(2) GILLIAN ELEANOR BRUCE**

**(3) EDWARD JOHN MACNAMARA**

**(THE JOINT ADMINISTRATORS OF LEHMAN BROTHERS INTERNATIONAL  
(EUROPE) (IN ADMINISTRATION))**

**Applicants**

**(1) JULIAN GUY PARR**

**Respondent**

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**ORDINARY APPLICATION**

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**TAKE NOTICE that Russell Downs, Gillian Eleanor Bruce and Edward John Macnamara of PricewaterhouseCoopers LLP, 7 More London Riverside, London, SE1 2RT, the current joint administrators of Lehman Brothers International (Europe) (in administration) (“LBIE”), intend to apply to the Judge on:**

**Date:** .....

**Time:** .....

**Place:** ..... 7 Rolls Building, Fetter Lane, London EC4A 1NL

**FOR THE FOLLOWING RELIEF:**

1. A declaration that the contents of the notice of intention to resign given by Julian Guy Parr under rule 3.63(1)(a) of the Insolvency (England and Wales) Rules 2016 ("IR16") on 1 March 2019 (the "Notice") were sufficient for the purposes of entitling him (having delivered that notice to those persons enumerated at rule 3.63(4) IR16 (to the extent applicable), and upon the expiry of the applicable notice period provided by rule 3.63(1) IR16) to resign as an administrator of LBIE by giving notice in writing to the Court under paragraph 87(2)(a) of Schedule B1 to the Insolvency Act 1986 ("IA86").
2. Alternatively, if (contrary to paragraph 1 above) the contents of the Notice were insufficient to entitle Julian Guy Parr to resign as an administrator of LBIE by giving notice in writing to the Court under paragraph 87(2)(a) of Schedule B1 IA86, a direction as to what (if anything) the contents of a fresh Notice must include in order to entitle him to resign under paragraph 87(2)(a) of Schedule B1 IA86.
3. In the further alternative, an Order permitting Julian Guy Parr to resign pursuant to rule 3.62(2) IR16, or pursuant to such other provision of IR16 and/or IA86 (or on such other jurisdictional basis) as the Court considers applicable.
4. An Order, pursuant to paragraph 98(2)(c) of Schedule B1 IA86, that Julian Guy Parr's discharge from liability under paragraph 98(1) of Schedule B1 IA86 in respect of any act or omission in his individual capacity as an administrator of LBIE, shall take effect from the date falling 60 days after the date on which his resignation as an administrator of LBIE became or shall become (as the case may be) effective, save in respect of claims notified to the then current joint administrators of LBIE before that date.
5. The next progress report shall notify the creditors of LBIE of the making of this Order, and provide an explanation of the effect of the Order.
6. The costs of this application be paid as an expense of the administration of LBIE.

**Dated this 8<sup>th</sup> day of March 2019**

Signed:

  
.....

Applicants' solicitors: Linklaters LLP

Position held: Associate

The Applicants' address for service is:

Linklaters LLP, One Silk Street, London EC2Y 8HQ

Reference: Susan Roscoe / Rory Conway

A copy of the Application will be served on the Respondent.

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Linklaters LLP (S Roscoe / R Conway)  
One Silk Street  
London EC2Y 8HQ

Tel: (+44) 20 7456 2000

Fax: (+44) 20 7456 2222

Solicitors for the Applicants