

Obrazac 3.

FINANCIJSKA AGENCIJA
RC SPLIT

FINANCIJSKA AGENCIJA

OIB: 85821130368

03-05-2019

MAŽURANIĆEVO ŠETALIŠTE 24B
(adresa nadležne jedinice) 21000 SPLIT

PREDSTEČAJNE NAGODBE
PRIMANJE I OTPREMA POSTE
KLASA 120-11/19-0C/32
UR. BROJ 07-0279-90

Nadležni trgovački sud u SPLITU
Poslovni broj spisa ST - 115 / 2019

PRIJAVA TRAZBINE VJEROVNIKA U PREDSTEČAJNOM POSTUPKU

PODACI O VJEROVNIKU:

Ime i prezime / tvrtka ili naziv

BEZMALINOVIC LEGAL WAYS B.V.
OIB - STRANA (NILOZEMSKA TVRTKA) NL 85206518P B01

Adresa / sjedište

HEEMRAADSSINGEL 105, 3022 CR ROTTERDAM,
NILOZEMSKA

PODACI O DUŽNIKU:

Ime i prezime / tvrtka ili naziv

BRODOTROGIR D.D.
OIB 02610134628

Adresa / sjedište

PUT BRODOGRADITELJA 16, 21220 TROGIR

PODACI O TRAZBINI:

Pravna osnova tražbine (npr. ugovor, odluka suda ili drugog tijela, ako je u tijeku sudski postupak oznaku spisa i naznaku suda kod kojeg se postupak vodi)

PRUŽENA PRAVNA USLUGA U NILOZEMSKOJ (ARBITRAŽA) NA
Iznos dospjele tražbine 941.122,73 (kn) = 126.726,42 EUR RAČUN
Glavnica 941.122,73 (kn) ugovora.
Kamate - (kn)

Iznos tražbine koja dopijeva nakon otvaranja predstečajnog postupka

941.122,73 (kn) = 126.726,42 EUR

Dokaz o postojanju tražbine (npr. račun, izvadak iz poslovnih knjiga)

RAČUNI POD BROJEM 2018/20, 2018/21, 2018/26, 2019/1

Vjerovnik raspolaze ovršnom ispravom DA / NE za iznos (kn)

Naziv ovršne isprave

+ IZJAVA
BRODOTROGIRA

PODACI O RAZLUČNOM PRAVU:

Pravna osnova razlučnog prava

Dio imovine na koji se odnosi razlučno pravo

Iznos tražbine _____ (kn)

Razlučni vjerovnik odriče se prava na odvojeno namirenje ODRIČEM / NE ODRIČEM

Razlučni vjerovnik pristaje da se odgodi namirenje iz predmeta na koji se odnosi njegovo razlučno pravo radi provedbe plana restrukturiranja PRISTAJEM / NE PRISTAJEM

PODACI O IZLUČNOM PRAVU:

Pravna osnova izlučnog prava

Dio imovine na koji se odnosi izlučno pravo

Izlučni vjerovnik pristaje da se izdvoji predmet na koji se odnosi njegovo izlučno pravo radi provedbe plana restrukturiranja PRISTAJEM / NE PRISTAJEM

Mjesto i datum

DELNICE (HR), 2-5-2019

Potpis vjerovnika

Bezmalinovic Legal Ways B.V.
Advocatenkantoor - Law Firm
Heemraadssingel 105 BE
3022 CB Rotterdam, The Netherlands

TONČI BEZMALINović
DIREKTOR

PRILOZI : - RAČUNI POD BROJEM 2018/20,
2018/21,
2018/26,
2019/1

- IZJAVA BRODOTROGIR D.D - A DATUMA 12-12-'18
u VEZI RAČUNA 2018/20 i 2018/21



Brodotrogir d.d.
Put brodograditelja 16
21220 Trogir
Croatia

24 July 2018

FEE NOTE

VAT ID No. Brodotrogir d.d. : HR02610134628
VAT ID No. Bezmalinovic Legal Ways B.V. : NL852065188B01

Re. : Brodotrogir / Centraalstaal c.s. (Joint Runner project)

Invoice no. : 2018 / 20

To fees and disbursements in the period from 1 April 2017 until and including 11 April 2018, to wit (hour fee of EUR 300):

April 2017 : 10.8 hours

- advice regarding appointment and challenge of arbitrators in TAMARA arbitration which has been made pending by Centraalstaal c.s.;
- drafting correspondence in this regard.

May 2017: no hours

June 2017: no hours

July 2017: 0.5 hours

- correspondence regarding meeting in Saint-Tropez with Centraalstaal, Barkmeijer and CFL (which meeting in the end has been cancelled);

August 2017: no hours

September 2017: 2.4 hours

- correspondence regarding hearing about challenge of Mr. Anto Nobile as arbitrator and settlement approach of Centraalstaal (Mr. Rutger Hilkhuisen);

October 2017: 6.2 hours

- conference call with Centraalstaal (Mr. Rutger Hilkhuisen) and Barkmeijer (Mr. Hans Veraart) as well advice / opinion in this regard.

November 2017: 20.3 hours

- hearing at the Court of Groningen on 6 November 2017 regarding challenge of Mr. Nobile as arbitrator including travelling and preparation time;

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Legal Ways B.V.**
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- settlement meeting with Centraalstaal (Mr. Rutger Hilkhuisen) and Barkmeijer (Mr. Hans Veraart) after the hearing on 6 November 2017 in Groningen.

December 2017: 7.5 hours

- studying decision of the Court of Groningen regarding challenge of Mr. Nobilo as arbitrator and advising client in this regard;
- further correspondence regarding settlement meeting with Centraalstaal c.s. in Trogir in January 2018.

January 2018: 12 hours (Tonci Bezmalinovic)

2.3 hours (Nigel Margetson)

- meeting in Trogir with Brodotrogir, Centraalstaal and Barkmeijer including preparation and travelling / waiting time – 13 and 14 January 2018;
- correspondence to find solution for Joint Runner-project.

February 2018: 18.2 hours (Tonci Bezmalinovic)

13.1 hours (Nigel Margetson)

- drafting and filing appeal in the case regarding challenge of Mr. Nobilo as arbitrator (Court of Arnhem-Leeuwarden, location Leeuwarden).
- conference call with arbitrators and opponents including preparation and correspondence afterwards.

March 2018: 6.5 hours (Tonci Bezmalinovic)

1.0 hours (Nigel Margetson)

- studying statement of claim as filed by Centraalstaal c.s. in arbitration as well as correspondence with arbitrators inter alia about the status of the appeal proceedings regarding challenge of Mr. Nobilo as arbitrator.

April 2018 (until and including 11 April 2018): 9 hours (Tonci Bezmalinovic)

6.2 hours (Nigel Margetson)

- preparing for meeting in Trogir with client (12 April 2018) including travelling time.

Total hours in this period: 93.4 hours (Tonci Bezmalinovic)

22.6 hours (Nigel Margetson)

Total hours (Tonci Bezmalinovic and Nigel Margetson): 116 hours

Disbursements consist of travelling and hotel costs regarding hearing on 6 November 2017 in Groningen, meeting on 14 January 2018 and 12 April 2018 in Trogir (EUR 1.575,45) and general office costs (fixed at 3% of fee – EUR 1.044).

Fee	EUR 34.800,00
Disbursements	EUR 2.619,45
	----- +
Total	EUR 37.419,45

VAT Reverse Charge

Please make payment within 7 days to my account with ING Bank N.V. (BIC: INGBNL2A), IBAN a/c NL73 INGB 0006 7943 32 in the name of Bezmalinovic Legal Ways B.V., mentioning the above invoice number.

TIME MR. TONCI BEZMALINOVIC FEE NOTE 2018/20 (24.7.2018) by day

Brodotrogir vs Centraalstaal c.s.		
EUR 300		
Date	Activity	Time (hours)
10.4.2017	Receipt notice of arbitration, forwarding and discussing it with client	2,2
21.4.2017	e-mail to client regarding appointment of arbitrator	0,8
24.4.2017	Conference call with client about challenge of Mr. Van Mierlo as arbitrator and appointment of Mr. Nobilo as arbitrator, studying rules for challenge of arbitrator, drafting both letters for Brodotrogir which have been sent by Brodotrogir to all involved persons / parties	7,8
Total April 2017:		10,8
30.12.2017	Correspondence regarding appointment of Mr. Neven Bahun as arbitrator as replacement of challenged arbitrator Mr. Nobilo	1,0
Total December 2017:		1,0
04.01.2018	e-mail Margetson regarding incoming docs TAMARA	0,2
13.1.2018	Meeting in Trogir with client (including travelling time)	6,0
14.1.2018	Meeting in Trogir with client (including travelling time)	6,0
17.1.2018	Telcon Margetson about next steps arbitration	0,3
Total January 2018:		12,5

06.02.2018	Consultation with Margetson regarding e-mail to Tribunal	0,2
07.02.2018	Preparation conference call Tribunal	1,2
08.02.2018	Conference call Tribunal including pre and post briefing at office of Margetson	3,0
12.02.2018	Internal consultation with Margetson regarding NDA and arbitration costs	0,4
13.02.2018	Consultation Margetson re Procedural Order No. 1 and No. 2	0,3
14.02.2018	Internal consultation with Margetson regarding incoming docs TAMARA	0,3
16.02.2018	Consultation Margetson regarding e-mails TAMARA & De Hoop	0,2
17.02.2018	Consultation Margetson regarding confidentiality clauses	0,2
26.02.2018	Consultation Margetson regarding e-mail to Tribunal	0,2
28.02.2018	Consultation regarding incoming letter Tribunal	0,2
Total February 2018:		6,2
13.03.2018	Studying statement of claim and exhibits and informing client about content / arguments	3,5
13.03.2018	Translation of appeal grounds regarding decision challenge of Mr. Nobilo as requested by Tribunal on 28.02.2018	2,5
14.03.2018	E-mail to Tribunal regarding appeal proceedings challenge Mr. Nobilo	0,5

Total March 2018:		6,5
10.4.2018	Preparation for meeting with client in Brodotrogir to discuss statement of claim	3,0
11.4.2018	Travelling time and preparation for meeting with client on 12.4.2018 liaising with Margetson during pre meeting in Trogir	6,0
Total April 2018		9,0

Brodotrogir v CFL, Centraal Staal et al – counsel Nigel Margetson – Fee note 2018 / 20		
EUR 300		
Date	Activity	Time (minutes)
04/01/2018	downloading documents from Tamara site, persual of same, email to Tonci	12
14/01/2017	telcons in Tonci, telcon out Tonci, email out Danko	78
17/01/2018	internal consultation Tonci	18
26/01/2018	email out cln	30
02/02/2018	telcon out Tonci, email out cln	24
05/02/2018	email in cln, email in arbitrators	12
06/02/2018	email out tribunal, internal consultation, email out Tribunal, email in Tribunal	24
07/02/2018	preperation for conference call with arbitrators, email out Tonci	90
08/02/2018	preperation for conference call tribunal, conference call, post conference call meeting Tonci	180
12/02/2018	drafting NDA	54
12/02/2018	advising on costs of arbitration	48
13/02/2018	procedural orders 1 and 2 in, documents mr De Hoop in, drafting response to procedural order no 2, reordering file in the manner as suggested in PO no 2	72
14/02/2018	obtaining document from Tamara online ptf, receipt and perusal of letters from mr De Hoop, emails Tamara in and checking online ptf, message out to tribunal re draft procedural order no 2, message out to opposing counsel regarding venue, court reporters and NDA	66
16/02/2018	emails Tamara in, email de Hoop in, email De Hoop out	24
17/02/2018	email in De Hoop, perusal of law re confidentiality, perusal of contracts re confidentiality clauses, advice to cln, draft email to De Hoop	48
19/02/2018	email out oppo	12
21/02/2018	procedural order in arbitrators, email in opponent, email in Tamara	18
21/02/2018	email cln in / out	6

22/02/2018	email to tribunal pursuant to procedural order no 2, uploading same to Tamara website	24
26/02/2018	letter in oppo, perusal of Tamara Rules, perusal of law, email out Tribunal	36
28/02/2018	emails tribunal and opponent in, emails out	48
01/03/2018	emails tribunal and opponent in, emails out	30
02/03/2018	emails oppo in	6
08/03/2018	receipt of Statement of Claim	6
23/03/2018	receipt and perusal of PO 3, receipt and perusal of copy of letter of Tribunal to Tamara, receipt and perusal of letter of Claimants, email to Tribunal and Claimants	18
06/04/2018	tribunal letter in, opponent letter in, tribunal email out	12
11/04/2018	travelling to Croatia	360
	Total time (minutes)	1356



Brodotrogir d.d.
Put brodograditelja 16 21220 Trogir
Croatia

12 September 2018

FEE NOTE

VAT ID No. Brodotrogir d.d. : HR02610134628
VAT ID No. Bezmalinovic Legal Ways B.V. : NL852065188B01

Re. : Brodotrogir / Centraalstaal c.s. (Joint Runner project)

Invoice no. : 2018 / 21

To fees and disbursements in the period from 27 July 2018 until and including

11 September 2018 to wit (hour fee of EUR 300):

July 2018 : 3 hours

- studying "claimant's comment on respondent's reply to claimants' interim statement dated 27 July 2018".

August 2018: 32 hours

- drafting and filing reply to "claimant's comment on respondent's reply to claimants' interim statement dated 27 July 2018" on 1 August 2018;

- meeting with client on 19 August 2018;

- studying file and preparing statement of rejoinder.

September 2018 (until and including 11 September 2018: 45 hours)

- drafting and finalizing statement of rejoinder and filing with further exhibits.

Total hours: 81 hours

Disbursements consist of travelling and hotel costs regarding meeting on 19 August 2018 in Trogir (EUR 605,70) and general office costs (fixed at 3% of fee – EUR 729).

**Bezmalinovic
Legal Ways BV**
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BTW NL852065188B01

Fee	EUR 24.300,00	
Disbursements	EUR 1.334,70	+

Total	EUR 25.634,70	

VAT Reverse Charge

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TIME MR. TONCI BEZMALINOVIC FEE NOTE 2018/21 (12.9.2018) by day

Brodotrogir vs Centraalstaal c.s.		
EUR 300		
Date	Activity	Time (hours)
31.7.2018	Studying "claimant's comment on respondent's reply to claimants' interim statement dated 27 July 2018"	3,0
Total July 2017:		3,0
01.08.2018	Drafting and sending reply to "Claimant's comment on respondent's reply to Claimant's interim statement" dated 27 July 2018	4,0
19.08.2018	Meeting with client in Trogir – preparation for statement of rejoinder and witness statements (including travelling time)	9,0
20.08.2018	Travelling time back after meeting 19.08.2018	6,0
24.08.2018	Studying statement of reply and preparing statement of rejoinder	4,0
27.08.2018	Studying statement of reply and preparing statement of rejoinder	5,5
28.08.2018	Studying statement of reply and preparing statement of rejoinder	3,5
Total August 2018		32,0
03.09.2018	Studying correspondence (to substantiate connection and misrepresentation argument)	7,0
04.09.2018	Studying correspondence (to substantiate connection and misrepresentation argument) drafting statement of rejoinder	6,0
05.09.2018	Drafting statement of rejoinder	8,0

06.09.2018	Studying relevant case law and drafting statement of rejoinder	8,0
10.09.2018	Drafting statement of rejoinder – incorporating witness statements	8,0
11.09.2018	Finalizing statement of rejoinder, sending it with all exhibits to Tribunal and opponent	8,0
Total September 2018 (until and including 11.9.2018)		45,0



Brodotrogir d.d.
Put brodograditeljia 16
21220 Trogir
Croatia

17 December 2018

FEE NOTE

VAT ID No. Brodotrogir d.d. : HR02610134628
VAT ID No. Bezmalinovic Legal Ways B.V. : NL852065188B01

Re. : Brodotrogir / Centraalstaal c.s. (Joint Runner project)

Invoice no. : 2018 / 26

To fees and disbursements in the period from 12 September 2018 until and including 17 December 2018, to wit (hour fee of EUR 300):

September 2018 (from 12 September 2018): 3.5 hours

- sending legal exhibits to arbitrators and opponent by WeTransfer;
- sending all documents to client;
- updating table of contents (exhibits).

October 2018: 29.5 hours

- updating exhibit bundle, translating relevant parts of legal exhibits and sending completed hard copies of statement of rejoinder with exhibits and updated list of exhibits to arbitrators and opponent;
- correspondence with arbitrators and opponent about hearing of witnesses;
- pre hearing conference call with arbitrators and opponent;
- correspondence with arbitrators and opponent about bankruptcy of Barkmeijer.

November 2018: 78 hours

- studying file as preparation for hearing;
- drafting opening statement and questions for witnesses;
- drafting letter to liquidator of Barkmeijer (termination of building agreement);
- hearing on 6, 7 and 8 November 2018;
- correspondence about full disclosure Groningen proceedings and disclosure by Mr. Manning;
- drafting and filing post hearing brief;
- studying opponent's post hearing brief;
- reaction on requests of opponent regarding "exception plurium litis consortium";

**Bezmalinovic
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BTW NL852065188B01

December 2018: 58,5 hours

- drafting reaction on re-written claim / quantum by opponent and filing it.
- drafting writ of summons against CFL c.s. and arranging service by bailiff;
- drafting letter to liquidator of Barkmeijer and arranging service by bailiff;
- appeal hearing in the case regarding challenge of Mr. Nobilo including preparation.

Total hours: 169,5 hours

Disbursements consist of court fees in the appeal challenge case of Mr. Nobilo (EUR 726), DHL costs for sending statement of rejoinder (EUR 77,12), hotel costs regarding arbitration hearing in Rotterdam (EUR 1.260,45), hotel costs regarding appeal hearing challenge of Mr. Nobilo (EUR 177,74), costs of court interpreter for Mr. Nobilo (EUR 459,62) and general office costs (fixed at 3% of fee – EUR 1.525,50).

Fee	EUR 50.850,00
Disbursements	EUR 4.226,43
	----- +
Total	EUR 55.076,43

VAT Reverse Charge

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TIME MR. TONCI BEZMALINOVIC FEE NOTE 2018/26 (17.12.2018) by day

Brodotrogir vs Centraalstaal c.s.		
EUR 300		
Date	Activity	Time (hours)
12.09.2018	Finalizing upload of documents via WeTransfer and forwarding everything to client	2,0
14.09.2018	Incoming letter Tribunal	0,2
21.09.2018	Drafting updated exhibit list and sending it to Tribunal	1,3
Total hours (remainder of September 2018)		3,5
5.10.2018	Incoming letter Tribunal	0,3
8.10.2018	E-mail to Tribunal witnessing Mr. Koolhof	1,3
9.10.2018	Translating relevant parts of all legal exhibits	7,5
10.10.2018	Finalizing translation relevant parts of all legal exhibits and sending it to Tribunal and reading incoming letter Tribunal	5,5
11.10.2018	E-mail to Tribunal with enclosures	2,8
12.10.2018	Updating Table of Contents and preparing hard copies and sending it to Tribunal and opponent	4,5
14.10.2018	Preparing conference call 15.10.2018	1,2
15.10.2018	Further preparation conference call, Tel opponent and conference call	1,5
22.10.2018	E-mail to Tribunal regarding Procedural Order No. 4 (first part)	1,5

23.10.2018	E-mail to Tribunal regarding Procedural Order No. 4 (second part)	0,5
31.10.2018	E-mails Tribunal regarding bankruptcy of Barkmeijer after studying Dutch bankruptcy law and literature	2,9
Total October 2018		29,5
1.11.2018	Studying file as preparation for hearing	6,0
2.11.2018	Studying file as preparation for hearing	7,5
3.11.2018	Studying file as preparation for hearing	8,0
4.11.2018	Formulating questions witnesses and drafting opening statement	8,0
5.11.2018	Meeting client, discussing implications of bankruptcy of Barkmeijer regarding building contract, drafting letter to liquidator Barkmeijer, finalizing opening statement	8,0
6.11.2018	Sending letter to liquidator Barkmeijer, e-mail to Tribunal, day 1 hearing	10,0
7.11.2018	Day 2 hearing	10,0
8.11.2018	Day 3 hearing	5,0
15.11.2018	Request full disclosure documents proceedings at the Court of Noord-Nederland, Groningen between CFL and Barkmeijer	2,5
16.11.2018	E-mail Tribunal regarding Mr. Manning	0,5
20.11.2018	Incoming Procedural Order No. 6 and e-mail Mr. Manning and forwarding it to client	0,5

21.11.2018	Studying transcripts witness statements	3,0
22.11.2018	Further study of transcripts – drafting post hearing brief	3,5
23.11.2018	Finalizing and filing post hearing brief	3,0
26.11.2018	Studying post hearing brief opponent and sending it to client	0,8
28.11.2018	Drafting and sending letter to Tribunal regarding opponents' protest regarding "exception plurium litis consortium"	1,5
30.11.2018	Incoming letter Tribunal	0,2
Total hours November 2018		78
6.12.2018	Drafting submission about quantum / re-written claim Opponents	5,0
7.12.2018	Finalizing submission about quantum and legal exhibit CL-30 and handing it in	5,0
17.12.2018	Drafting letter to liquidator of Barkmeijer, arranging service by bailiff and e-mail to Tribunal	2,5

Total hours December 2018		12,5
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17 December 2018

FEE NOTE

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November 2018: 78 hours

- studying file as preparation for hearing;
- drafting opening statement and questions for witnesses;
- drafting letter to liquidator of Barkmeijer (termination of building agreement);
- hearing on 6, 7 and 8 November 2018;
- correspondence about full disclosure Groningen proceedings and disclosure by Mr. Manning;
- drafting and filing post hearing brief;
- studying opponent's post hearing brief;
- reaction on requests of opponent regarding "exception plurium litis consortium";

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- appeal hearing in the case regarding challenge of Mr. Nobilo including preparation.

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Total	EUR 55.076,43

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TIME MR. TONCI BEZMALINOVIC FEE NOTE 2018/26 (17.12.2018) by day

Brodotrogir vs Centraalstaal c.s.		
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10.10.2018	Finalizing translation relevant parts of all legal exhibits and sending it to Tribunal and reading incoming letter Tribunal	5,5
11.10.2018	E-mail to Tribunal with enclosures	2,8
12.10.2018	Updating Table of Contents and preparing hard copies and sending it to Tribunal and opponent	4,5
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1.11.2018	Studying file as preparation for hearing	6,0
2.11.2018	Studying file as preparation for hearing	7,5
3.11.2018	Studying file as preparation for hearing	8,0
4.11.2018	Formulating questions witnesses and drafting opening statement	8,0
5.11.2018	Meeting client, discussing implications of bankruptcy of Barkmeijer regarding building contract, drafting letter to liquidator Barkmeijer, finalizing opening statement	8,0
6.11.2018	Sending letter to liquidator Barkmeijer, e-mail to Tribunal, day 1 hearing	10,0
7.11.2018	Day 2 hearing	10,0
8.11.2018	Day 3 hearing	5,0
15.11.2018	Request full disclosure documents proceedings at the Court of Noord-Nederland, Groningen between CFL and Barkmeijer	2,5
16.11.2018	E-mail Tribunal regarding Mr. Manning	0,5
20.11.2018	Incoming Procedural Order No. 6 and e-mail Mr. Manning and forwarding it to client	0,5

21.11.2018	Studying transcripts witness statements	3,0
22.11.2018	Further study of transcripts – drafting post hearing brief	3,5
23.11.2018	Finalizing and filing post hearing brief	3,0
26.11.2018	Studying post hearing brief opponent and sending it to client	0,8
28.11.2018	Drafting and sending letter to Tribunal regarding opponents' protest regarding "exception plurium litis consortium"	1,5
30.11.2018	Incoming letter Tribunal	0,2
Total hours November 2018		78
6.12.2018	Drafting submission about quantum / re-written claim Opponents	5,0
7.12.2018	Finalizing submission about quantum and legal exhibit CL-30 and handing it in	5,0
17.12.2018	Drafting letter to liquidator of Barkmeijer, arranging service by bailiff and e-mail to Tribunal	2,5

Total hours December 2018		12,5
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Brodotrogir d.d.
Put brodograditelja 16
21220 Trogir
Croatia

1 February 2019

FEE NOTE

VAT ID No. Brodotrogir d.d. : HR02610134628
VAT ID No. Bezmalinovic Legal Ways B.V. : NL852065188B01

Re. : Brodotrogir / Centraalstaal c.s. (Joint Runner project)

Invoice no. : 2019 / 1

To fees and disbursements in the period from 18 December 2018 until and including 31 January 2019, to wit (hour fee of EUR 300):

December 2018 (from 18 September 2018): 14.5 hours

- Elaborating and filing further court document to Appeal Court of Arnhem-Leeuwarden, location Leeuwarden regarding service of notice to Mr. Nobilo for the hearing at the Court of Noord-Nederland, location Groningen, in first instance;
- Elaborating and filing cost submissions to Arbitral Tribunal.

January 2019: 10 hours

- elaborating and filing exhibit bundle with all relevant proof to the Court of Amsterdam; sending a copy of it to the lawyers of CFL c.s..

Total hours: 24.5 hours

Disbursements consist of bailiff costs regarding service of documents to liquidator of Barkmeijer and CFL c.s. (EUR 279,90) court fees in the proceedings against CFL c.s. (EUR 639), courier cost for sending exhibit bundle to the Court (EUR 105,44) and general office costs (fixed at 3% of fee – EUR 220,50).

Fee	EUR 7,350.00
Disbursements	EUR 1,244.84
	----- +
Total	EUR 8,595.84

VAT Reverse Charge

Please make payment within 7 days to my account with ING Bank N.V. (BIC: INGBNL2A), IBAN a/c NL73 INGB 0006 7943 32 in the name of Bezmalinovic Legal Ways B.V., mentioning the above invoice number.

**Bezmalinovic
Legal Ways BV.**
Advocatenkantoor

Heemraadssingel 105
3022 CB Rotterdam
Postbus 25339
3001 HH Rotterdam
Tel: +31 (0)10 476 51 71
Fax: +31 (0)10 799 95 62
Mobile: +31 (0)6 105 430 08
info@legal-ways.com
www.legal-ways.com

KvK 56302711
BTW NL852065188B01



BRODOTROGIR d.d.
SHIPYARD TROGIR
TROGIR - CROATIA

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21220 Trogir, Croatia
tel: +385 (0) 21 883 333
fax: +385 (0) 21 881 881
www.brodotrogir.hr

CEO
tel: +385 (0) 21 883 100
fax: +385 (0) 21 884 044
direktor@broadotrogir.hr

Tonci Bezmalinovic
BEZMALINOVIC LEGAL WAYS B.V.
Heemraadssingel 105
3022 CB Rotterdam
NETHERLANDS

Trogir, 12th December 2018

Subject: TAMARA-CASE REF. 17004
1. Centraalstaal B.V.
2. eL-Tec Electrotechnologie B.V.
3. Konstructiebedrijf Coops & Nieborg B.V.
4. Barkmeijer Stroobos B.V.
vs. Brodotrogir d.d.

Dear Mr. Bezmalinovic,

With reference to the Procedural Order No. 6, Item 11 – Costs Submission, which the Arbitral Tribunal issued on 12 November 2018, Brodotrogir d.d. hereby confirms the receipt of invoices for the attorneys' professional services and disbursements in this arbitration and their payment status as they are presented in the table below:

No.	Invoice Issuer	Invoice Number	Invoice Date	Invoice Amount EUR	Paid Amount EUR	Payment Date	Outstanding Amount EUR
1	BEZMALINOVIC LEGAL WAYS B.V.	2016/42	09.02.2017	39.157,00	39.157,00	12.5.2017	
2	BEZMALINOVIC LEGAL WAYS B.V.	2017/4	03.4.2017	18.437,93	18.437,93	04.01.2018	
3	MVTZ	2018/70	12.4.2018	30.877,45	5.000,00	10.5.2018	25.877,45
4	MVTZ	2018/89	14.5.2018	7.631,62			7.631,62
5	MVTZ	2018/130	24.7.2018	3.598,18			3.598,18
6	BEZMALINOVIC LEGAL WAYS B.V.	2018/20	24.7.2018	37.419,45			37.419,45
7	BEZMALINOVIC LEGAL WAYS B.V.	2018/21	12.9.2018	25.634,70			25.634,70
Total amount				162.756,33	62.594,93		100.161,40

As it follows from the table above, the total amount of all invoices which Brodotrogir d.d. has received up to this day for the attorneys' professional services and disbursements in this arbitration amounts to the sum of is EUR 162.756,33.





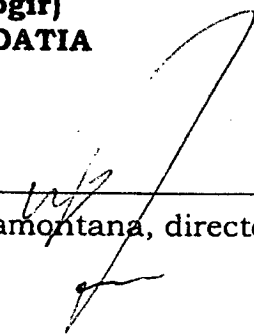
Part of this amount which is EUR 62.594,93 has been paid, while the amount outstanding on this day is EUR 100.161,40.

Brodotrogir d.d. obliges itself to pay this amount by 31st January 2019 out of funds which Brodotrogir d.d. has to receive up to that date according to the cash flow plan made on the basis of the dynamics of the production process.

In the meantime, we are at your disposal for any further information.

Sincerely yours,

For and on behalf of
BRODOTROGIR d.d.
(Shipyard Trogir)
TROGIR, CROATIA

by: 
Mateo Tramontana, director

Stjepan Brankovic 1960-11-04 BU.

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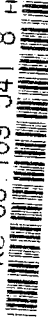
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PRIMA PWA

NAKUPNO: SENALISTO 243

FINANCIJSKA AGENCIJA
REGIONALNI CENTAR SPLIT

03.05.2019

PRIMANJE UPLATE

21000 SPUS