

In the First Hall of the Civil Court

Whosoever is in receipt of this sworn application in his regard shall file a sworn reply within twenty (20) days from the date of service thereof, which is the date of receipt. Should no written sworn reply be filed in terms of the law within the prescribed time, the Court shall proceed to adjudicate the matter according to law.

It is for this reason in the interest of whosoever receives this sworn application to consult an advocate without delay that he may make his submissions during the hearing of the case.

1. **VistaJet Group Holding Limited (C-73543);**
2. **VistaJet Malta Finance plc (C-70230);**
3. **VistaJet Limited (C-55231); and**
4. **Vista Global Holding Limited, a company registered in the United Arab Emirates with reference number 2953**

Versus

1. **Air X Charter Holding Limited (C-59615);**
2. **Air X Charter Limited (C-59616);**
3. **John B. Matthews (British Passport number 509343308);**
4. **Debbie Camenzuli (551085M);**

5. Daniel Apap (441690M);
6. Houssam Hazzoury (Passport Malti MT132979);
7. Friederich Baldinger (110854A), and
8. Abigail Bartolo (410085M)

Sworn application of VistaJet Group Holding Limited et

Respectfully submit and Adv. Nicholas Valenzia (3181M), acting for and on behalf of the applicants as duly authorised, in English and on oath confirms the following facts as personally known to him:

1. That through the present sworn application, the plaintiffs are requesting compensation for the damages suffered as a result of the respondents' malevolent, negligent and egregious conduct. In their pursuit of disrupting the plaintiffs' business operations and tarnishing their reputation, the defendants have engaged in the unauthorised dissemination of confidential information and/or documentation pertaining to the plaintiffs' business affairs. The defendants have also orchestrated the fabrication and dissemination of information to various media outlets, authorities and third parties, including important business partners, lenders, and clients of the plaintiffs, thereby compounding the harm inflicted upon the plaintiffs.
2. VistaJet Group Holding Limited is a holding company established under the laws of Malta and forms part of the VistaJet Group, which VistaJet Group includes VistaJet Malta Finance plc and VistaJet Limited. Vista Global Holding Limited is the parent company of VistaJet Group Holding Limited. [hereinafter all plaintiffs shall be collectively referred to as "**VistaJet**"]
3. VistaJet Malta Finance plc is also based in Malta and is a multi-series bond issuer since 2015. It has currently issued, 2027, 2028 and 2030 senior

unsecured notes, which have an aggregate principal amount of USD 2 billion.

4. Vista Global Holding Limited was incorporated in 2018 in Dubai International Financial Centre of the United Arab Emirates as the new top-holding company of the VistaJet Group, which holds one-hundred percent (100%) interest in the Malta-based VistaJet Group.
5. The VistaJet Group was established in 2004, and has been operating from Malta since 2012, is a world-renowned private aviation group, particularly for its global fleet of private jets registered in Malta. VistaJet has been operating successfully for the past twenty (20) years and has grown exponentially throughout the years by investing heavily in its fleet, owning more than two hundred eighty (280) aircraft of which it operates more than ninety (90) aircraft under the Maltese flag through its subsidiary VistaJet Limited. VistaJet Group employs more than 3,225 staff of which 445 are based in Malta;
6. VistaJet has successfully placed, through its subsidiary VistaJet Malta Finance plc, multiple senior unsecured notes (“Bonds”) in excess of USD 3.5 billion in aggregate since 2015 on the international capital markets. It has a proven financial track record of no defaults in payment of its leases or other financial obligations;
7. VistaJet has in recent years undertaken substantial investments in fortifying its fleet and markets presence through acquisitions. This positive trajectory is underscored by a series of commendatory assessments from reputable financial rating agencies, including but not limited to Moody’s, Fitch, Standard & Poor’s (S&P) and Kroll. Recently, amongst these professional and international recognised evaluators, Fitch and Kroll have recently affirmed VistaJet’s outlook as stable;

8. Thomas Flohr is the founder and chairman of VistaJet. He dedicated the last twenty (20) years of his life to grow VistaJet into a leading player in the private jet industry and remains its majority shareholder. He has steered the group successfully through its various phases of growth with a healthy mix of debt, proceeds generated from and reinvested in the business and only few select equity funding rounds. In 2016 he has been awarded by Living-Legends-of-Aviation as Entrepreneur of the year aligning him with Sir Richard Branson and Mr Tom Enders in this esteemed recognition. He is a successful leader of his sector held in high regard.
9. That the defendant company AirX Charter Limited [hereinafter referred to as “AirX”] is also a company established under the laws of Malta, which also operates in the private aviation industry. The other defendants are all currently employed in different roles within AirX;
10. John Matthews, the founder of AirX, has a history marked by bankruptcies, regulatory infringements, constant conflicts with business rivals, dissemination of false information and statements and a past occurrence of imprisonment for perverting the course of justice as well, just to name a few;
11. John Matthews has these past six years decided to take it upon himself, together with the other defendants and other competitors of VistaJet, to damage the plaintiffs’ business affairs and reputation through whatever means possible;
12. The plaintiffs have recently obtained information, mainly a WhatsApp Group Chat titled ‘Vista Comms’, showing that the defendants have been doing much more than just normal competitor analysis on the plaintiffs and have been conspiring against VistaJet with the intent to undermine them by engaging in a series of illicit and/or unethical activities all designed to inflict harm upon the plaintiffs and all persons and entities connected to the

plaintiffs as shall be further explained in this application and throughout the proceedings of the case in question.

13. The defendants have not only manipulated the media against the plaintiffs, and all persons affected, with incorrect, incomplete and/or misleading information on them, but also obtained and disseminated confidential documentation and/or information in breach of applicable laws and/or court orders;
14. As an example, there are currently pending proceedings instituted by Frontiers Capital I Limited Partnership ('Frontiers'), a Guernsey Limited Partnership, against Thomas Flohr before the UK courts. The said proceedings relate to a business venture entered between, amongst others, Frontiers and Thomas Flohr more than twenty (20) years ago, and which business venture is unrelated to VistaJet and/or private aviation. During a UK High Court hearing on the 20th July 2023 an order was issued by the relative Court presided by Master Brightwell where it was ordered for a number of confidential witness statements, which were exhibited by Frontiers, to be kept confidential and that they are not to be made available in the court files and to the public due to their irrelevant, prejudicial and defamatory content.
15. Although the statements are not available to the public to view and have not been aired in open court, as evidenced from the mentioned WhatsApp Group Chat, it transpired that the statements were demanded by and provided to the defendants in clear breach of the relative court order. The following messages exchanged in the *Vista Comms WhatsApp Group Chat* confirm that John Matthews met with Timothy Horlick, founder of Frontiers:
 - i. *"Meeting Tim Horlick next week"* (sent at 11:08 AM on 21 November 2023);

- ii. *"On Thursday I'm having lunch with Tim Horlick. I don't know the time yet but he is a very wealthy investor and obviously the person who is suing Thomas"* (sent at 5:45 PM on 23 January 2023);
- iii. *"With Tim Horlick and his lawyer"* (sent at 2:47 PM on 25 January 2023);
- iv. 00002778-PHOTO-2024-01-26-09-16-43.jpg sent at 9:16:43 AM on 26 January 2024, which is a screenshot showing a 19-minute phone call with Tim Horlick.

Following such meetings John Matthews obtained the court confidential statements in question, which were exhibited in the pending proceedings instituted by Frontiers as mentioned above, as confirmed in the following messages also found in the mentioned WhatsApp Group Chat:

- i. John Matthews sent three messages at 3:40 PM on 25 January 2024, where he reveals that he gained access to documents which were subject to the mentioned court order : *"22 a and b Amended particulars of claim please"; "With WSJ and lawyers"; and "They can't legally show me"*.
- ii. *"Witnesses have been released"*. (sent at 3:40 PM on 25 January 2024)
- iii. On 26th January 2024 between 1:21 PM and 3:14 PM, John Matthews shared 10 screenshots of the mentioned witness statements, which should have remained confidential.

Following the above, the witness statements were then leaked via a proton email account, wilhemhedwig@protonmail.com, to VistaJet's stakeholders and business partners and various journalists on the 29th January 2024. The

following evidence from the WhatsApp Group Chat shows that individuals within the WhatsApp Group Chat were responsible for this publication:

- i. *"Houssam, today is an important day marking the release of the witness statements to all at Bombardier who hold an executive title. Would you be able to get me the emails, please? Copied all the journalists who are competing for the story over the weekend."* (sent by John Matthews in the Vista Comms Group Chat at 8:45 AM on 29 January 2024)
 - ii. Four out of the five emails sent to journalists and VistaJet stakeholders by the wilhemhedwig@protonmail.com account which leaked the relative witness statements, also included as an addressee heather@calgaryskincancer.com. The email address appears to be the email address for a Heather Harper, who works at a Canadian cancer clinic. In a message sent by Daniel Apap in the WhatsApp Group Chat (a) at 9:41 AM on 22 June 2023; (b) at 4:50 PM on 2 August 2023; and (3) at 2:48 PM on 25 January 2024; the heather@calgaryskincancer.com email address is included, and which email was shared in the WhatsApp Group Chat.
16. The defendants have also in some way managed to obtain confidential non-public documents and reports containing VistaJet's confidential information, which documents include unaudited interim financial reports, confidential preliminary offering circulars and bond offering memorandum of VistaJet Malta Finance plc and VistaJet Co Finance LLC, investor presentations and even legal correspondence addressed to Thomas Flohr;
 17. The majority of the said documents were only available on VistaJet's Investors' platform and which access was subject to any person using such platform to agree to a Non-Disclosure Agreement. The Non-Disclosure Agreement clearly provides that relative information cannot be disclosed

without VistaJet's consent, in which case none of the defendants had obtained such consent from VistaJet. Notwithstanding such documents are clearly confidential and could not and should not have been divulged, the defendants have proceeded in disseminating the same to journalists, and also to rating agencies and VistaJet's lenders and suppliers to cripple VistaJet's business operations.

18. Some of the articles which VistaJet is aware of that were published on the basis of information leaked by the defendants consist of include the following:

- a. The article titled '*Private jet disrupter: the debt-fuelled ascent of Thomas Flohr's VistaJet*' published on the Financial Times article by Dan McCrum - <https://www.ft.com/content/57e19c7c-90bc-4c25-9bdb-efc6c361873e>
- b. The article titled '*VistaJet Shares Similarities To Struggling Wheels Up In Private Air Charter*' published on Forbes by Brian Foley - <https://www.forbes.com/sites/brianfoley1/2023/05/17/vistajet-shares-similarities-with-struggling-wheels-up-in-private-air-charter/>
- c. The article titled '*Financial Times: VistaJet, XO parent Vista Global debt, net losses mounting*' published on Private Jet Card Comparisons by Doug Gollan - <https://privatejetcardcomparisons.com/2023/05/17/financial-times-vistajet-xo-parent-vista-global-debt-net-losses-mounting/>
- d. The article titled '*VistaJet, government's 'trusted' private jet investment, is \$4.4 billion in debt*' published on The Shift News by Sean Montebello - <https://theshiftnews.com/2023/05/17/vistajet-muscat-govts-trusted-private-jet-investment-is-4-4-billion-in-debt/>

- e. The article titled '*VistaJet CEO defends company's financial as auditor raises liquidity debt concerns*' published on CNBC by Natasha Turak - <https://www.cnbc.com/2023/05/19/vistajet-ceo-defends-companys-financials-amid-liquidity-debt-concerns.html>
- f. The article titled "*Thomas Flohr: Die fragwürdigen Geschäfte des Privatjet-Königs*" published on WirtschaftsWoche by Melanie Bergermann and Volker ter Haseborg - <https://www.wiwo.de/my/finanzen/geldanlage/privatjetfirma-air-hamburg-thomas-flohr-die-fragwuerdigen-geschaefte-des-privatjet-koenigs/29191572.html>
- g. The article titled "*Government's 'trusted' private jet company chairman in UK court*" published on The Shift News by Sean Montebello - <https://theshiftnews.com/2023/08/06/governments-trusted-private-jet-company-chairman-in-uk-court/>
- h. The article titled '*Dem Privatjet-König laufen die Mitarbeiter weg / The employees run away from the private jet king*' published on WirtschaftsWoche by Volker ter Haseborg - <https://www.wiwo.de/my/unternehmen/dienstleister/air-hamburg-dem-privatjet-koenig-laufen-die-mitarbeiter-weg/29386846.html>
- i. The article titled '*VistaJet owner Thomas Flohr loses a bid to strike out historic legal claim*' published on the Financial Times by Dan McCrum - <https://www.ft.com/content/52523044-5509-482b-915b-d23f690fa01a>
- j. The article titled '*Schlappe vor Gericht für den Privatjet-König / Defeat in court for private jet king*' published on WirtschaftsWoche by Volker ter Haseborg. - <https://www.wiwo.de/my/unternehmen/dienstleister/thomas-flohr-die-problem-zahlen-des-privatjet->

[koenigs/29648414.html#:~:text=Schlappe%20vor%20Gericht%20of%20C3%BCr%20den,Millionen%20Euro%20vom%20Vistajet%20DChief](#)

- k. The article titled '*Chef der VistaJet kämpft Gegen Betrugsvorwurf/ VistaJet boss fights against fraud allegations*' published on DMM - <https://www.dmm.travel/nc/news/chef-der-vistajet-kaempft-gegen-betrugsvorwurf>

 - l. The article titled '*Ein total verrücktes Jahr für den Privatjet-König / a totally crazy year for the private jet king*' published on WirtschaftsWoche - <https://www.wiwo.de/my/unternehmen/energie/thomas-flohr-ein-total-verruecktes-jahr-fuer-den-privatjet-koenig-/29571722.html>

 - m. The article titled '*How One Debt Laden Company Could Create a Storm for Private Jets*' published on the Wall Street Journal by Jon Sindreu. - <https://www.wsj.com/finance/vista-global-private-jet-market-ad1e4727>

 - n. The article titled '*Die Problem-Zahlen des Privatjet-Königs / The private jet king's problem figures*' published on WirtschaftsWoche by Melanie Bergermann, Philipp Frohn and Volker ter Haseborg. - <https://www.wiwo.de/my/unternehmen/dienstleister/thomas-flohr-die-problem-zahlen-des-privatjet-koenigs/29648414.html>
19. The articles in question are all based on biased information prepared and provided by AirX and/or the other defendants to the journalists, which information refers to wrong or other irrelevant information, which information was highlighted specifically by the defendants in order to detract from the truth and that is that VistaJet is not actually on the brink of going bankrupt as the articles in question wrongly imply. The following extracts from the WhatsApp Group Chat obtained by the plaintiffs confirms this:

- i. *"Good morning everyone, we've got until Tuesday at 3 o'clock to be able to think of all the items which proves Vista is a charter company. Thank you Dan asked me to prepare questions in a succinct way by Sunday"* (sent by John Matthews at 8:42:23AM on 22 May 2023);
 - ii. *"John Matthews: Today I will release the plan as to what we do when it comes out
Jak: Commentary / Op-Ed needs some momentum.
Jak: fingers crossed for tomorrow
John Matthews: Yes
John Matthews: Get me to bloomberg or and email now"* (messages exchanged from 6:34:53PM on 11 May 2023);
 - iii. *"John Matthews: "After weeks of working with the German main business magazine "Wirtschaftswoche" (magazine section of the "handelsblatt" the German FT equivalent), the business news editor has confirmed the story of VistaJet losses, the money alleged to have been taken away from Air Hamburg, and the Pyramid Scheme pre selling of hours will be published next week, either in the main paper (Monday) or the business magazine (Friday). Last night, lawyers gave their approval, which was disclosed this morning."* (message sent at 1:24:24 PM on 1 June 2023);
 - iv. 00001617-PHOTO-2023-06-13-10-19-35 sent at 10:19:35 AM on 13 June 2023, which is a screenshot of messages exchanged between John Matthews with Volker Ter Haseborg, a journalist at WirtschaftsWoche, asking for a list of questions he would send to VistaJet and Thomas Flohr.
20. Moreover, to further manipulate journalists in using the biased information prepared by the defendants for their articles, the defendants adopted the

manipulative strategy of sending materials by means of anonymous emails giving the appearance of a whistle blower and/or by contacting them directly so as to give the impression that there are multiple sources divulging the same information. Journalists were fed with potential stories and were in instances even provided with questions pre-drafted by the defendants to be asked to the plaintiffs pre-publication.

21. Indeed, the use of anonymous emails was also adopted in the instance referred to in paragraph 14 of this sworn application, where by means of anonymous emails the defendants distributed highly defamatory witness statements to lenders, key suppliers and other recipients with the goal to discredit Thomas Flohr and VistaJet.
22. Some examples of these instances where anonymous emails were sent by Daniel Apap which transpire from the relative WhatsApp Group Chat include;
 - i. *"John Matthews: ...make sure attachments have no digital history..."* (sent at 10:19:02 AM on 17 May 2023);
 - ii. *"John Matthews: [FT journalist Dan McCrum] wants us to send the latest bond perspective [sic] to all journalist [...] He is putting it in print tomorrow so he can move it forward.. So it's in the paper tomorrow.. @35679664007 can we start up the anonymous email"* (sent between 9:10:26 AM and 9:11:12 AM on 17 May 2023);
 - iii. *"John Matthews: I don't trust CJI... Let's send things through an anonymous email... Please... Dan and Matthew ready for the list ?... Bond persoectus... [sic] Cash flow (free) graph highlighting [sic] the back office removed... The section of not being IFRS or anything... Risk section TF interests different to Vista... Risk that vista lease will never*

- serve a purpose*" (sent between 9:26:55 AM and 9:33:07 AM on 18 May 2023);
- iv. 00000978-AUDIO-2023-05-17-09-13-18 sent at 9:13:18 AM on 17 May 2023, in which John Matthews ask for documents to be sent to *'every journalist' from the yahoo or whatever you have set up'*;
 - v. 00001216-AUDIO-2023-05-18-10-01-48 sent at 10:01:48 AM on 18 May 2023, in which John Matthews demands for documents to be sent to Dan McCrum from *'a different email without IP track'*;
23. These tactics adopted by the defendants and their manipulative behaviour and co-conspiracy has resulted in severely negatively impacting the plaintiffs' business affairs and reputation, which includes but is not limited to the following:
- a. VistaJet lost existing and prospective customers following negative media reporting;
 - b. Deposits paid by existing clients were also called on following adverse media;
 - c. VistaJet was not able to complete and/or finalise certain financial arrangements in view of *'being visible in the press'*;
 - d. Certain VistaJet lenders, sought to exit at the first available opportunity, increasing the financing costs for VistaJet as the replacement cost of the capital was higher;
 - e. Suppliers changed their payment terms, removed credit limits, and/or in some instances VistaJet was requested to make prepayments;

- f. In Germany for example, VistaJet' s aircraft lessors sought to pull their aircraft from VistaJet' s fleet;
 - g. New financing became increasingly challenging to obtain for VistaJet and related costs increased significantly;
 - h. Loss of the shareholders' equity value in VistaJet since VistaJet' s share price significantly dropped in value as a result of the defendants' conduct;
 - i. The day-to-day running of VistaJet was severely impacted, as considerable time was lost with key executives having to respond to enquiries from the press, investors, clients, and employees.
24. VistaJet was not the only victim of the defendants' actions. Bombardier Inc, which is one of the main private jet manufacturers in the world, and VistaJet is one of its main clients, has also lost 7% in value in just one day following the publication of certain articles. The journalists involved can also be considered as victims of the defendants' manipulative plot as they were used as pawns to damage VistaJet' s bond and the stock value of Bombardier solely for the benefit of the defendants and not for the greater good as they will undoubtedly try to also manipulate this Honourable Court in believing their narrative.
25. That, moreover, with unbelievable malice, by sending anonymous emails to VistaJet' s suppliers such as Bombardier Inc and its investors and banks, this malicious behaviour almost resulted in destabilising these important relationships which VistaJet took years to build.
26. That this behaviour is abusive and for which abusive behaviour the defendants should be considered as absolutely responsible. This wanton disregard for ethics and legality underscores the gravity of the defendants' behaviour. The intentional and calculated nature of their actions have not

only caused a direct threat to the financial well-being of the plaintiffs, but also undermined the integrity of their professional reputation. The severity of the defendants' wrongdoings and their actions not only violated established legal norms but also strike at the very core of business ethics and fair competition.

27. Indeed, such behaviour is also considered as illegal, such as article 34 of the Commercial Code specifically provides that competitors are not to "*spread news capable of prejudicing business or trade*" carried on by another competitors.

28. It is evident that the primary motive of the defendants, behind their unethical and illegal conduct and distribution network to spread confidential material, is for the pursuit of their own financial gain. Even if they will likely proclaim that they are spreading such information for the common good, in reality the defendants' true intentions are solely for financial gain and this simply to be able to recuperate AirX's dire financial situation, charter out their fleet at higher hourly rates by taking advantage of their being less aircrafts in the market and help their own equity raise needs by benefitting from a self-proclaimed market correction caused by the plaintiffs' demise. The defendants' true motives can be evidenced from the following extracts of the relative WhatsApp Group Chat:

i. In the context of discussing a private equity buy out of Air X, John Matthews sent the following five messages between 11:41 AM and 2:46 PM on 7 April: (a) "*When [Financial Times] article [about VistaJet] comes out we get a higher value*"; (b) "*It's an amazing feeling*" (c) "*AirX = no debt*" (d) "*Keep imagining AirX without debt*" (e) "*That is quite something to imagine*".

ii. John Matthews shared a video (file name 00000488-VIDEO-2023-04-25-14-20-51.mp4) to the WhatsApp Group Chat at 2:20 PM on 25 April 2023, which was apparently taken on his phone, showing

various computer screens containing VistaJet related documents, and includes the song *“Time to say goodbye”* playing in the background. He followed up with a message stating: *“I will in a strange way miss Thomas [Flohr]”*.

- iii. After a Guardian article about the rise in jet plane prices is shared, Jonathan Wynn sent a message at 11:04 AM on 3 May 2023, in which he states: *“Do they already know about one seller about to have to firesell [sic] 400 aircraft [crying with laughter emoji].”* Houssam Hazzoury responds with: *“maybe we can tell them [laughing emoji]”*.
- iv. In the context of postponing a call with a potential investor in Air X, John Matthews sent a voice note to the WhatsApp Group Chat at 10:56 AM on 17 May 2023 (file name 00001025- AUDIO-2023-05-17-10-56-52), stating: *“Certaes call can wait for me. We have only one person in the game. This news will help us get more institutional investors. Zeus believes they can bring TowerBrook back in amongst other institutional type lenders. And the more coverage we get not only helps us in our PR, but it also helps us and gain exposure on VistaJet. Part of the due diligence is based upon the market. Helping the market correct... is better than arguing with people who have a different view on the market – not saying we are arguing, but there is one person who is pro-Vista. This is a huge move that shows confidence. The founder is too busy to see the Private Equity Firm that wants to buy them on this particular day, because everything he has been working towards for 6 years, has just come off and there is a lot of interest in talking to him. That’s a very powerful move.”*
- v. In the context of discussing a negative article about VistaJet by the journalist Dan McCrum which was published by the Financial

Times as a result of the group feeding allegations to Mr McCrum, Jonathan Wynn sent a message at 7:53 AM on 17 May 2023 stating: *“Don’t feel like this is a one punch knock out at all.”*

- vi. In the context of various owners of jets considering not allowing their jets to be used by VistaJet following the publication of negative news stories about it, John Matthews sent a message at 7:18 AM on 19 May 2023 stating: *“It is imperative to have this information as the grounding of the fleet necessitates an immediate increase in our rates. We could easily add on €1k an hour. If this (more like when) happens.”*

29. The plaintiffs are seeking payment of damages, which to date consists of at least three hundred eighty six million Euros (€386,000,000), for the significant harm and damage caused by the defendants, which will be quantified and substantiated in more detail by the plaintiffs during the course of these proceedings.

THEREFORE, in view of the above, the plaintiffs humbly request that this Court should, foresee any other necessary statement and opportunity, to:

- (i) Declare that the conduct of the defendants or any of them as described above, has caused and, or is continuing to cause significant damages to the applicants;
- (ii) Declare that the defendants or any of them are responsible to compensate the applicants for such damages;

- (iii) Liquidate all the damages suffered by the applicants, including but not limited to the damages for their loss of reputation, if necessary with the aid of experts;
- (iv) Order the defendants or any of them to pay the applicants any amount thus liquidated as damages;

With judicial costs and interests against the defendants, who are and/or their representatives are hereby injunctivated for subjugation.

For all intents and purposes of the law, the plaintiffs are annexing together with this sworn application, a translation of the same application in the English language.

Avv. Joseph Camilleri

Mamo TCV – 103

Strait Street, Valletta

Avv. Frank Testa

Avv. Maria-Lisa Buttigieg

P.L. Silvana Vella

LIST OF WITNESSES:

1. Past and present representatives, directors and employees of the plaintiffs and of their subsidiaries and of any entity forming part of the VistaJet Group to confirm the aforementioned facts and to testify on more details regarding the facts of the case;
2. Past and present representatives, directors, employees and advisors of the defendants, for the subjugation and to testify in consideration and cross-examination;
3. Experts of law and legal foreign procedures;
4. Representatives of local and foreign Courts and Court registrars and judicial authorities;
5. Other experts ex parte including auditors and financial experts in the relevant jurisdictions;

6. Past and present representatives, directors, employees and consultants of any subsidiaries, banks, rating agencies, suppliers, business partners, stakeholders, and also any clients of the plaintiffs and/or the VistaJet Group so as to testify in consideration of the relevant facts;
7. Any other person or entity that was provided with information relating to the plaintiffs;
8. Editors and journalists or similar of any media outlet;
9. Past and present representatives, directors, employees and consultants of any entity or person engaged by the defendants and/or any of their subsidiaries and also of any other entities connected in a direct or indirect manner with AirX, so as to testify in consideration of the relevant facts;
10. The witnesses which eventually will be indicated by the respondents in examination and / or cross-examination according to the case;
11. Any such other witnesses as may be required;

Avv. Joseph Camilleri

Mamo TCV – 103

Strait Street, Valletta

Avv. Frank Testa

Avv. Maria-Lisa Buttigieg

P.L. Silvana Vella

LIST OF DOCUMENTS

Doc A – A CD containing a copy of the WhatsApp Group Chat titled “Vista Comms”, which CD includes a copy of the recordings and/or photos which are referred to in the extracts quoted in this sworn application

Avv. Joseph Camilleri

Avv. Frank Testa

Mamo TCV – 103
Strait Street, Valletta

Avv. Maria-Lisa Buttigieg

P.L. Silvana Vella

Applicants:

Service: