

**FORM G**  
**PROOF OF CLAIM BY ANY OTHER STAKEHOLDER**

(Under Regulation 20 of the Insolvency and Bankruptcy Board of India  
(Liquidation Process) Regulations, 2016)

21 January 2022

To  
THE LIQUIDATOR  
MR. VEDAGIRI KRISHNAMURTHY  
KAKINADA DEEP WATER PORT, FIRST FLOOR,  
OSV COMPLEX, BEACH ROAD,  
KAKINADA – 533005 (AP)

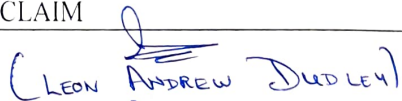
From  
RIGGERS

**Subject:** Submission of proof of claim in respect of the liquidation of SEMBMARINE KAKINADA LIMITED under the Insolvency and Bankruptcy Code, 2016.

Madam/Sir,

RIGGERS hereby submits this proof of claim in respect of the liquidation in the case of SEMBMARINE KAKINADA LIMITED. The details for the same are set out below:


1.	NAME OF OTHER STAKEHOLDER  (IF AN INCORPORATED BODY PROVIDE IDENTIFICATION NUMBER AND PROOF OF INCORPORATION. IF A PARTNERSHIP OR INDIVIDUAL PROVIDE IDENTIFICATION RECORDS* OF ALL THE PARTNERS OR THE INDIVIDUAL)	RIGGERS  UDYAM-AP-03-000-6794
2.	ADDRESS AND EMAIL OF THE OTHERSTAKEHOLDER FOR CORRESPONDENCE.	S. NO. 4/4, VAKALAPUDI, OPP. ONGC 72 ACRE YARD, KAKINADA, E.G. DISTRICT ANDHRA PRADESH - 533005  <a href="mailto:riggerslog.infra@gmail.com">riggerslog.infra@gmail.com</a> MOB. NO. 9008653521
3.	TOTAL AMOUNT OF CLAIM, INCLUDING ANY INTEREST AS AT LIQUIDATION COMMENCEMENT AND DETAILS OF NATURE OF CLAIM	PRINCIPAL : Rs 4,44,87,980/-  CLAIM  INTEREST : Rs 1,32,39,706/-  TOTAL : Rs 5,77,27,686/- CLAIM

  
(LEON ANDREW DUDLEY)  
FOR RIGGERS

4.	DETAILS OF DOCUMENTS BY REFERENCE TO WHICH THE CLAIM CAN BE SUBSTANTIATED	THE CLAIM OF RIGGERS IS SUBSTANTIATED BY REFERENCE TO THE DAMAGE INCIDENT AND THE SURVEY REPORT THERETO WHICH CONFIRMS AND ESTABLISHES THE CLAIM OF RIGGERS AGAINST SEMBMARINE KAKINADA LTD. THE LIST OF DOCUMENTS IN SUPPORT OF THE CLAIM ARE PROVIDED BELOW.
5.	DETAILS OF HOW AND WHEN CLAIM AROSE	THE CLAIM AROSE ON THE 29 DECEMBER 2018 WHEN SKL-02 CRANE OF SEMBMARINE KAKINADA LTD. FELL ON THE TRUCK MOUNTED HYDRAULIC CRANE (DEMAG AC 265 100 TON CRANE) OF M/S RIGGERS.
6.	DETAILS OF ANY MUTUAL CREDIT, MUTUAL DEBTS, OR OTHER MUTUAL DEALINGS BETWEEN THE CORPORATE DEBTOR AND THE OTHER STAKEHOLDER WHICH MAY BE SET-OFF AGAINST THE CLAIM	NONE
7.	DETAILS OF ANY RETENTION OF TITLE IN RESPECT OF GOODS OR PROPERTIES TO WHICH THE CLAIM REFERS	THE DAMAGED DEMAG AC 265 100 TON CRANE IS PRESENTLY LYING IN THE YARD OF SEMBMARINE KAKINADA LTD. AND THE OWNERSHIP OF THE CRANE IS WITH RIGGERS.
8.	DETAILS OF ANY ASSIGNMENT OR TRANSFER OF DEBT IN HIS FAVOUR	NONE
9.	DETAILS OF THE BANK ACCOUNT TO WHICH THE OTHER STAKEHOLDER'S SHARE OF THE PROCEEDS OF LIQUIDATION CAN BE TRANSFERRED	ICICI BANK SARPAVARAM BRANCH, KAKINADA, ACC. NO. 315805000147 IFSC COD: ICIC0002477
10.	LIST OUT AND ATTACH THE DOCUMENTS RELIED ON IN SUPPORT OF THE CLAIM.	<ol style="list-style-type: none"> <li>1. POLICE COMPLAINT FILED BY RIGGERS AT THE SHO, KAKINADA</li> <li>2. POLICE'S ACKNOWLEDGEMENT OF COMPLAINT</li> <li>3. THIRD PARTY SURVEY REPORT</li> </ol>

(*Leon Andrew Dudley*)  
FOR RIGGERS

4. LAWYER NOTICE DATED 03.01.2019 SENT BY RIGGERS
5. EMAIL DATED 09.01.2019 SENT BY RIGGERS TO SEMBMARINE KAKINDA LTD. AND SRI SAI OILFIELD EQUIPMENT AND MARINE SERVICES
6. INVOICE DATED 26.11.2018 FOR SALE OF CRANE BY SREE GANESHA CRANES TO RIGGERS
7. SALE LETTER DATED 17.11.2018 ISSUED BY SREE GANESHA CRANES TO RIGGERS
8. QUOTATION OF PURCHASE OF SIMILAR CRANE AS REQUESTED BY SEMBMARINE KAKINDA LTD.
9. QUOTATION OF SCRAP VALUE OF DAMAGED CRANE OF RIGGERS AS REQUESTED BY SEMBMARINE KAKINDA LTD.
10. THIRD PARTY INSURANCE OF CRANE AT THE TIME OF DAMAGE INCIDENT
11. RC BOOK OF THE DAMAGED CRANE
12. LETTER DATED 14.01.2020 OF RIGGERS TO SKL RESUBMITTING THE CLAIM DOCUMENTS
13. PAYMENT OF GST FOR PURCHASE OF CRANE
14. APPLICATION AND GRANT OF NOC TO RIGGERS BY ROAD TRANSPORT AUTHORITY, GOVT. OF MAHARASHTRA
15. VEHICLE REGISTRATION STATUS FROM MINISTRY OF ROAD TRANSPORT

  
(CLEON ANDREW DUDLEY)  
FOR RIGGERS

	<p>16. PROOF OF PAYMENT FOR PURCHASE OF CRANE BY RIGGERS FROM SREE GANESHA CRANES</p> <p>17. LEGAL NOTICE OF PAYMENT OF CLAIM</p> <p>18. MEDIATION APPLICATION (PIM 07/2021, DISTRICT LEGAL SERVICES AUTHORITY, VISAKHAPATNAM)</p>
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Signature of other stakeholder or person authorised to act on his behalf  
(Please enclose the authority if this is being submitted on behalf of the other stakeholder)



Name in BLOCK LETTERS

LEON ANDREW DUDLEY

Position with or in relation to creditor

PROPRIETOR

Address of person signing

S. NO. 4/4, VAKALAPUDI, OPP.  
ONGC 72 ACRE YARD, KAKINADA,  
E.G. DISTRICT  
ANDHRA PRADESH - 533005

\*PAN, Passport, AADHAAR Card or the identity card issued by the Election Commission of India.



## AFFIDAVIT

I, LEON ANDREW DUDLEY, S/O (LATE) NOEL DUDLEY, PROPRIETOR OFM/S RIGGERS, having its office at S. No. 4/4, Vakalapudi, Opp. ONGC 72 Acre Yard, Kakinada, E.G. District, Andhra Pradesh, PIN 533005, do solemnly affirm and state as follows:


1. The above named corporate debtor was, at the liquidation commencement date, that is, the day of 01 November 2021 and still is, justly and truly indebted to me for the damage and loss caused to me. The Corporate Debtor is liable to me in the sum of Rs. 5,77,27,686/- (Rupees Five Crores Seventy Seven Lakhs Twenty Seven Thousand Six Hundred and Eight Six Only) towards damage and loss caused to my property.
2. In respect of my claim of the said sum or any part thereof, I have relied on the documents specified below:
  1. POLICE COMPLAINT FILED BY RIGGERS AT THE SHO, KAKINADA
  2. POLICE'S ACKNOWLEDGEMENT OF COMPLAINT
  3. THIRD PARTY SURVEY REPORT
  4. LAWYER NOTICE DATED 03.01.2019 SENT BY RIGGERS
  5. EMAIL DATED 09.01.2019 SENT BY RIGGERS TO SEMBMARINE KAKINADA LTD. AND SRI SAI OILFIELD EQUIPMENT AND MARINE SERVICES
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  15. VEHICLE REGISTRATION STATUS FROM MINISTRY OF ROAD TRANSPORT
  16. PROOF OF PAYMENT FOR PURCHASE OF CRANE BY RIGGERS FROM SREE GANESHA CRANES
  17. LEGAL NOTICE OF PAYMENT OF CLAIM
  18. MEDIATION APPLICATION (PIM 07/2021, DISTRICT LEGAL SERVICES AUTHORITY, VISAKHAPATNAM)

3. The said documents are true, valid and genuine to the best of my knowledge, information and belief.
4. In respect of the said sum or any part thereof, I have not, nor any person, by my order, to my knowledge or belief, for my use, had or received any manner of satisfaction or security whatsoever. I further state there are *no mutual credit, mutual debts, or other mutual dealings between the corporate debtor and RIGGERS which may be set-off against the claim.*

Solemnly affirmed at Visakhapatnam on 21st January 2022 at Visakhapatnam

Before me,

Deponent's signature.

  
 (LEON ANDREW DUDLEY)  
 FOR RIGGERS


**ATTESTED**  
 21/01/22  
 Notary Public Commissioner.  
 VISAKHAPATNAM  
 ANDHRA PRADESH  
 INDIA

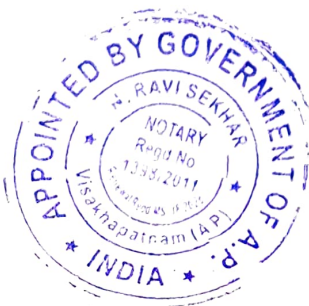
**VERIFICATION**

I, the Deponent hereinabove, do hereby verify and affirm that the contents of para 1 to 5 of this affidavit are true and correct to my knowledge and belief. Nothing is false and nothing material has been concealed therefrom.

Verified at Visakhapatnam on this the 21<sup>st</sup> day of January 2022.

Deponent's signature.

  
 (LEON ANDREW DUDLEY)  
 FOR RIGGERS



**ATTESTED**  
 21/01/22  
 NOTARY  
 VISAKHAPATNAM  
 ANDHRA PRADESH  
 INDIA

**N. RAVI SEKHAR, B.Com. B.L.**  
 ADVOCATE & NOTARY  
 D.No. 26-5-82, PRANAD GARDENS  
 BOWDARA ROAD,  
 VISAKHAPATNAM-1  
 C.FLL. . 8977606145 9059542509