

order was upheld. Title to the vessel was, nevertheless, transferred by Qubo 2 to Straight on 8th March 2017.

26. In my judgment, there is an irresistible inference that these actions were taken at H's instruction, and in a deliberate attempt to place M.V. "Luna" beyond the reach of the orders that the English court had made against Qubo 2 and which W was threatening to execute in Liechtenstein.
27. I have illustrated these recent developments in the attached amended organogram (which is the updated version of the one attached to my Judgment of 15th December 2016).

*Dubai proceedings*

28. W instructed counsel and lawyers in Dubai (Michael Black QC, Andrew Holden and Messrs Fitch & Co). On 8th February 2018 W obtained a freezing injunction in the DIFC against H and Straight which prevented them from disposing of or dealing with M.V. "Luna". Acting as a delegate of the DIFC Courts, and on the basis of the DIFC freezing injunction, on 13th February 2018 the Court of Dubai granted a precautionary attachment of M.V. "Luna". As a result, M.V. "Luna" was effectively impounded in Port Rashid where she remains under court order.
29. Straight immediately instructed its own counsel and lawyers who then applied to set aside the freezing injunction on the basis that the DIFC only has personal enforcement jurisdiction over H and not Straight. Straight's challenge to the continuation of the DIFC freezing injunction was, therefore, on the basis that the English Court had only entered judgment directly against H and not against Straight. It should be noted, however, that (i) Straight was incorporated two months after the English Judgment was entered and (ii) the transfer of M.V. "Luna" was effected by Qubo 2 in breach of the Freezing Order (see above).
30. On 8th March 2018, Straight obtained an urgent hearing of its application to set aside the DIFC order. On 11th March 2018, the DIFC Courts dismissed Straight's application and ordered the continuation of its freezing injunction, with written reasons to follow.
31. The DIFC Courts also declined to have an urgent appeal against its decision listed for the week commencing 18th March 2018. W submitted that this was a transparent attempt by Straight (and H) to overturn the DIFC freezing injunction prior to the hearing of the current application before the English Court listed for 21st March 2018. Straight was named as the Second Respondent in those proceedings and H was named as the First Respondent in those proceedings. Straight's lawyers admitted that they were funded by a third party. I infer that this must be H.
32. In the course of the hearing before me on 21st March 2018, the DIFC Courts' reasons were published and handed up to me. In a 50-paragraph detailed judgment, H.E. Justice Ali Al Madhani set out the full history of the English proceedings and the *gravamen* of the English Judgment and said this:

"44. In my judgment, I agree with the argument put forward by the Applicant that as a matter of fundamental policy, this court