

**The Bermuda Triangle, or
Ingenious Injunctions, Implied Undertakings, and Contumelious Conduct**

Alex Potts QC

Kennedys Bermuda

A. Ingenious Injunctions

1. *ERG Resources LLC v Nabors Global Holdings II Limited* [2012] SC (Bda) 23 Com: <https://www.gov.bm/sites/default/files/SC1204-E.R.G.-Resources-v-Nabors-Global-2012-SC-Bda-23-Com-5-April-2012.pdf>
2. *Dawson-Damer v Lyndhurst Limited* [2019] SC (Bda) 8 Civ: <https://www.gov.bm/sites/default/files/Judgment-A-Dawson-Damer-v-Lyndhurst-Limited.pdf>
3. *Awbury Technical Solutions LLC v Karson Management (Bermuda) Ltd* [2019] EWHC 233 (Comm) <http://www.bailii.org/ew/cases/EWHC/Comm/2019/233.html>

B. Implied Undertakings

4. *Athene Holding Limited v Siddiqui, Cernich, & Caldera Holdings Ltd* [2019] SC (Bda) 20 Com: <https://www.gov.bm/sites/default/files/Judgment-Athene-v-Siddiqui.pdf>
5. *ACL Netherlands BV v Lynch* [2019] EWHC 249: <http://www.bailii.org/ew/cases/EWHC/Ch/2019/249.html>

C. Contumelious Conduct

6. *Re MF Global Holdings Ltd.*, Chapter 11 Case No. 11-15059, Memorandum Opinion of US Bankruptcy Judge Martin Glenn dated 12 January 2017: http://www.nysb.uscourts.gov/sites/default/files/opinions/270097_67_opinion.pdf
7. *Sannapareddy et al v Commissioner of Bermuda Police Service et al* [2019] SC (Bda) 30 Civ: <https://www.gov.bm/sites/default/files/Judgment-Mahesh-Sannapareddy-et-al-v-The-Bermuda-Police-Commissioner-et-al-Conflict.pdf>
<http://www.royalgazette.com/news/article/20190522/pettingill-in-contempt-of-court>