

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 377 OF 2010

BETWEEN:

- (1) NOVACELL (ST. LUCIA) LIMITED
- (2) COMPLETWIRELESS JAMAICA LIMITED
(IN RECEIVERSHIP)
- (3) KENNETH TOMLINSON
(AS RECEIVER OF COMPLETWIRELESS JAMAICA
LIMITED)

PLAINTIFFS

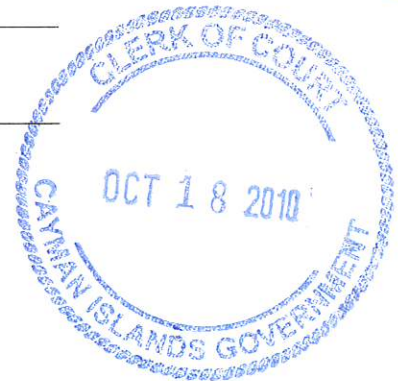
AND:

- (1) ISAAC RANKINE
- (2) PAN CARIBBEAN CONSULTING LIMITED

DEFENDANTS

ORIGINATING SUMMONS

- TO: (1) **Isaac Rankine**
c/o Business Solutions Technologies Group
P.O. Box 30165
480 North Sound Road
Grand Cayman KY1-1201
Cayman Islands
- (2) **Pan Caribbean Consulting Limited**
c/o Business Solutions Technologies Group
P.O. Box 30165
480 North Sound Road
Grand Cayman KY1-1201
Cayman Islands



LET THE DEFENDANTS, within 14 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, PO Box 495G, George Town, Grand Cayman.

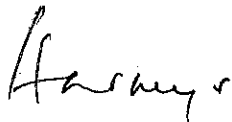
By this Summons, which is issued on the application of (1) NovaCell (St. Lucia) Limited, (2) CompletWireless Jamaica Limited (in Receivership), and (3) Kenneth Tomlinson (as Receiver of CompletWireless Jamaica Limited), the Plaintiffs claim against the Defendants relief in the following terms:

1. An Order (a draft of which is attached) under the principles set out in *Norwich Pharmacal Co. v Customs and Excise Commissioners* [1974] AC 133, that the Defendants do provide to the Plaintiffs' Attorneys-at-Law, in the manner and form

more particularly described in the draft Order, such information as is specified in the said draft Order, namely that the Defendants do reveal the identity of the person or persons in possession of the property specified in the Schedule attached hereto (the "Equipment"), together with the whereabouts of the Equipment.

2. That time for service of this Summons shall be abridged and the requirement for the Defendants to acknowledge service be dispensed with.
3. That costs be provided for.

Dated the 15th day of October 2010



HARNEY WESTWOOD & RIEGELS
Attorneys-at-Law for the Plaintiffs

IMPORTANT

Directions for Acknowledgement of Service are given with the accompanying form.

THIS ORIGINATING SUMMONS was issued by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiffs herein, whose address for service is 3rd Floor, Queensgate House, 113 South Church Street, P.O. Box 10240, Grand Cayman KY1-1002, Cayman Islands (Ref: SED/TAW/040212.0017).

**SCHEDULE
THE EQUIPMENT**

The Equipment is 1900MHZ BTS 3031 base transceiver stations, identified in the Nortel Networks invoices numbered below:

- CS270780
- CS270780A
- CS270831
- CS270931A
- CS270979
- CS270979A
- CS270988A
- CS271009
- CS271009A
- CS271010
- CS271011
- CS271594
- CS274701
- CS275215
- CS276828
- CS276833
- CS271828

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PLAINTIFFS

AND:

- (1) ISAAC RANKINE
- (2) PAN CARIBBEAN CONSULTING LIMITED

DEFENDANTS

DRAFT ORDER

UPON the Plaintiffs' application by Originating Summons dated 15th October 2010

AND UPON hearing Counsel for the Plaintiffs [and Counsel for the Defendants (the "Defendants")/Mr Rankine on behalf of the Defendants appearing in person/the Defendants not appearing]

AND UPON reading the documents recorded on the court file as having been read

[AND UPON the Plaintiffs by their Counsel giving the undertakings set out in Schedule 1 hereto]

IT IS ORDERED THAT

1. The 1st Defendant, on his own behalf and on behalf of the 2nd Defendant as its director, shall by 4 pm on 25th October 2010 swear, file and serve on the Plaintiffs' Attorneys-at-Law an Affidavit setting out with full details to the best of his knowledge information and belief, and exhibiting in each case all relevant documentation, the following information:

- (a) All information in his knowledge and/or possession relating to any person or persons who since 9th October 2008 purport and/or who have purported to own the telecommunications equipment described at Schedule 2 hereto (the “**Equipment**”) and/or to any person or persons who since 9th October 2008 possess and/or who have possessed the Equipment.
 - (b) All information in his knowledge and/or possession tending to reveal the whereabouts of the Equipment since 9th October 2008, whether (for the avoidance of doubt) that information relates to the Equipment’s past or current whereabouts.
2. Subject as aforesaid, all further proceedings in the action be stayed save for the purposes of enforcing compliance with this Order and for any applications thereunder.
 3. Time for service of this Summons shall be abridged and the requirement for the Defendants to acknowledge service be dispensed with.
 4. [Costs].

Dated this day of October 2010
Filed this day of October 2010

MR JUSTICE SMITH
Judge of the Grand Court

THIS ORDER was filed by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiffs herein, whose address for service is 3rd Floor, Queensgate House, 113 South Church Street, P.O. Box 10240, Grand Cayman KY1-1002, Cayman Islands (Ref: SED/TAW/040212.0017).

**SCHEDULE 1
PLAINTIFFS' UNDERTAKINGS**

[such undertakings as the court requires]