

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: ¹²¹ of 2011

IN THE MATTER OF THE COMPANIES LAW (2010 REVISION)
AND IN THE MATTER OF THE REGISTERED LAND LAW (2004 REVISION)

BETWEEN:

BRENNINI SABRE, INC.

APPLICANT

AND

1. PIRATES CAVES LIMITED
2. GIL STERN
3. PATRICIA ROHLEDER
4. DAVID ROHLEDER

RESPONDENTS

EX-PARTE ORIGINATING SUMMONS

LET ALL PARTIES CONCERNED attend before a Judge of the Grand Court in Chambers at the Law Courts, George Town, Grand Cayman on the _____ day of _____ at _____ or so soon thereafter as counsel may be heard for the following relief:

That the Court do make the following Orders, until or further Order in the meantime,

1. That the Second Respondent be restrained by himself, his servants and agents or otherwise howsoever from acting or purporting to act as director of the First Respondent, Pirates Caves Limited.
2. That Ellen J. Stern be entered into the Register of Directors as the sole director of the First Respondent.
3. (a) That the Second Respondent be restrained by himself his servants and agents or otherwise howsoever from charging, selling, transferring encumbering leasing, stratifying or in any way diminishing the value of that residential property in Bodden Town, Grand Cayman located at 53 Manse Road, and more specifically described as Bodden Town, Block 44B Parcel 4, and any stratification thereof; and

(b) That the Court do make an order pursuant to s.124 of the Registered Land Law (2004 Revision) inhibiting until further order, the registration of any dealing with that residential property in Bodden Town, Grand Cayman located at 53 Manse Road, and more specifically described as Bodden Town, Block 44B Parcel 4, including any stratification of the said parcel.

4. That the First Respondent by itself, its servants or agents be restrained from in any way dealing with parting with possession of, charging, transferring encumbering or diminishing the value of any property and assets until such time as the matter is brought back before the Court on an inter partes basis.
5. That the Second Respondent be ordered to provide within seven days of this Order an affidavit setting out (i) all property of whatsoever nature which the First Respondent was possessed of at the time of the Order (ii) stating the whereabouts of such property and (iii) all and any property (such as on sales, rent or howsoever) that has been acquired by the direct or indirect use of any property set out in (i) hereof.
6. The costs of this application, reserved pending inter partes hearing, and such further and other relief as to this Honourable Court may seem just.

DATED this 6th day of April 2011.



Bodden and Bodden
Attorneys for Applicant

TO: The Clerk of the Court

TIME ESTIMATE: The estimated length of the hearing of this summons is 1 hour.

THIS SUMMONS was filed by Bodden & Bodden, Attorneys-at-Law for and on behalf of the Petitioner whose address for service is that of her said attorneys at law, 802 West Bay Road, Grand Pavilion Commercial Centre, Grand Cayman KY1-1003 [ref: 1160-0001]