

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. ³⁵³ OF 2012

IN THE MATTER OF THE CONFIDENTIAL RELATIONSHIPS (PRESERVATION) LAW
(2009 REVISION)

AND

IN THE MATTER OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEOFFREY VARGA and WILLIAM CLEGHORN)
as Joint Official Liquidators of Bear Stearns High-Grade)
Structured Credit Strategies (Overseas) Ltd. and Bear)
Stearns High-Grade Structured Credit Strategies)
Enhanced Leverage (Overseas) Ltd.,)

Index No. 08 Civ. 03397
(AKH)

Plaintiffs)

-against-)

The Bear Stearns Companies, Inc. Bear Stearns Asset)
Management Inc., Bear Stearns & Co., Inc. Ralph Cioffi)
Matthew Tannin, Raymond McGarrigal, Barry Joseph)
Gerald R. Cummins, David Sandelovsky)
and Greg Quental)

Defendants)

IN THE MATTER OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEOFFREY VARGA and WILLIAM CLEGHORN)
As Joint Official Liquidators of Bear Stearns High-Grade)
Structured Credit Strategies (Overseas) Ltd. and Bear)
Stearns High-Grade Structured Credit Strategies)
Enhanced Leverage (Overseas) Ltd.,)

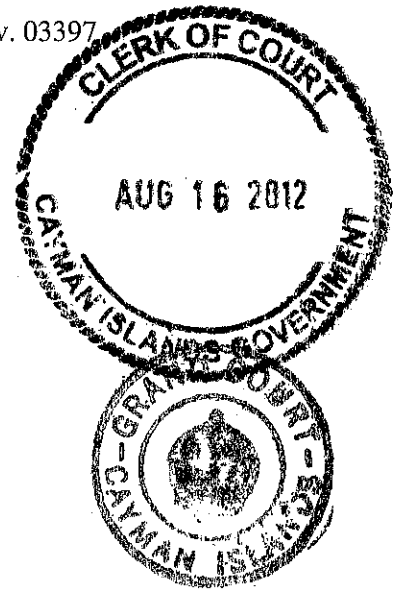
Index No. 09 Civ. 04936
(AKH)

Plaintiffs)

-against-)

Deloitte & Touche, LLP, Deloitte Touche Cayman)
Islands, Walkers Fund Services Limited, Walkers SPV)
Limited, Scott Lennon and Michelle Wilson-Clarke)

Defendants)



EX-PARTE ORIGINATING SUMMONS

LET ALL PARTIES CONCERNED attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman, Cayman Islands, on the _____ day of _____ 2012 at _____ a.m. on the hearing of an application by Geoffrey Varga and Mark Longbottom as the joint official liquidators (“the JOLs”) of Bear Stearns High-Grade Structured Credit Strategies Enhanced Leverage (Overseas) Ltd., (the “HGEL Fund”) seeking an Order pursuant to Section 4 of the Confidential Relationships (Preservation) Law (2009 Revision) that :

The HGEL Fund is permitted to give in evidence information concerning the identity, amount of shareholding and/or contact details of shareholder-investors in the HGEL Fund and/or identities of the members of the HGEL Fund’s Investor Advisory Committee (the “Confidential Information”) to the parties listed on the attached Schedule.

DATED this *16* day of August 2012

Solomon Harris

SOLOMON HARRIS
ATTORNEYS-AT-LAW FOR THE
APPLICANTS

TIME ESTIMATE: ½ day

THIS ORIGINATING SUMMONS was **FILED** by **SOLOMON HARRIS** of 3rd Floor, FirstCaribbean House, P.O. Box 1990, Grand Cayman, KY1-1104, Cayman Islands, Attorneys-at-law for the Applicants whose address for service is that of their said Attorneys-at-law.

SCHEDULE

1. The Bear Stearns Companies Inc., Bear Stearns Asset Management Inc., Bear Stearns & Co Inc., Ralph Cioffi, Matthew Tannin, Raymond McGarrigal, Barry Joseph, Gerald R. Cummins, David Sandelovsky, Greg Quintal, Walkers Fund Services Ltd, Walkers SPV Ltd, Scott Lennon and Michelle Wilson-Clarke, being the named individual defendants (collectively, “the Defendants”) in Case Nos. 08 Civ. 03397 (AKH) and 09 Civ. 04936 in the United States District Court, Southern District of New York (“the NY Actions”);
2. The officers, directors, partners, managing agents or employees who have managerial responsibility with respect to the prosecution, defence, settlement or other disposition of the NY Actions, together with members of their clerical and/or secretarial staff to the extent reasonably necessary to assist them, of: Kinetic Partners (the employers of the JOLs); The Bear Stearns Companies LLC (formerly The Bear Stearns Companies Inc.); Bear Stearns Asset Management Inc.; JPMorgan Securities Inc. (formerly Bear, Stearns & Co. Inc.); JPMorgan Clearing Corp. (formerly Bear, Stearns Securities Corp.); JPMorgan Chase and Co.; Walkers SPV Limited; Walkers Fund Services Limited; any domestic or foreign subsidiaries, affiliates, related companies, predecessors, successors and/or assignees of Walkers SPV Limited or Walkers Fund Services Limited;
3. Outside counsel of record for the parties to the NY Actions and their associates, secretaries, legal assistants, or other support personnel to the extent reasonably necessary to assist outside counsel in the NY Actions, in-house counsel and legal assistants and other support personnel assisting in-house counsel in the NY Actions, and any external contractors engaged in any aspect of organizing, copying, coding, imaging, filing, converting, storing or retrieving data, documents, photographs or other information, or designing programs for handling data in connection with the NY Actions, including performance of such duties in relation to a computerized litigation support system;
4. Non-party experts, consultants or outside litigation support personnel who are expressly engaged to assist counsel of record in the prosecution, defence, settlement or other

disposition of the NY Actions, together with members of their clerical and/or secretarial staff to the extent reasonably necessary to assist them, provided that such persons have not been employees of any of the parties to the NY Actions during the past seven (7) years;

5. The United States District Court, Southern District of New York (the "Court"), Court personnel, and jurors;
6. Court reporters and videographers who are retained to transcribe or videotape testimony in the NY Actions;
7. Actual witnesses that counsel for any party believes in good faith will testify at any deposition, hearing or trial in the NY Actions, both in advance of their testimony and in the course of assisting them in preparing to testify;
8. Any witness testifying at a deposition, hearing or trial in the NY Actions;
9. The Defendants' insurers or their counsel;
10. In regard to documents containing Confidential Information used at trial, persons attending trial or reviewing the Court's docket.