

IN THE GRAND COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

CAUSE No. FSD 0158 OF 2012 (AJJ)

BETWEEN:

BBX CAPITAL ASSET MANAGEMENT LLC

Plaintiff

-and-

(1) ROYAL BANK OF CANADA TRUST COMPANY (CAYMAN) LIMITED
(as Managing Trustee of the Firetrucks Trust dated 28/10/08)

(2) DANIEL CATALFUMO

(3) SUSAN'S PASSION LIMITED

Defendants

WRIT OF SUMMONS

TO: ROYAL BANK OF CANADA TRUST COMPANY (CAYMAN) LIMITED
PO Box 1586
24 Shedden Road
Grand Cayman
KY1-1110

TO: DANIEL CATALFUMO
725 Harbour Isle Pl
West Palm Beach
FL 33410, USA

TO: SUSAN'S PASSION LIMITED
c/o SH Corporate Services Limited
PO Box 61
Grand Cayman KY1-1102
Cayman Islands

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the next page.

Within 21 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495 GT, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 22nd day of November 2012

NOTE – This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 months) beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

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

GENERAL ENDORSEMENT

1. The Plaintiff claims:

Against the First Defendant:

- (a) US\$40,993,342.95, being the amount of a judgment debt entered against him by Bank Atlantic on 28 September 2011 by Hon. Dale Ross, Circuit Judge in the Courts of Broward County, Florida, USA, together with interest at the contractual rate of 4.75% p.a., which the Plaintiff, as the assignee of the Judgment and all rights associated therewith, seeks to enforce by action;
- (b) Interest thereon to be assessed;
- (c) Costs

Against the Second Defendant:

- (a) That the dispositions listed in Schedule 1 (“the Schedule 1 Dispositions”), having been made with an intent to defraud and at an undervalue (being for no consideration), be set aside pursuant to s. 4 Fraudulent Dispositions Law;

Alternatively:

- (b) That the Schedule 1 Dispositions be set aside as fraudulent transfers pursuant to the Florida Statutes, Title XLI, Chapter 726;

Alternatively:

- (c) That the Schedule 1 Dispositions be set aside pursuant to Jersey customary law;

Against the Third Defendant:

- (a) That the disposition listed in Schedule 2 ("the Schedule 2 Disposition"), having been made with an intent to defraud and at an undervalue (being for no consideration), be set aside pursuant to s. 4 Fraudulent Dispositions Law;

Alternatively:

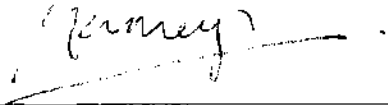
- (b) That the Schedule 2 Disposition be set aside as a fraudulent transfer pursuant to the Florida Statutes, Title XLI, Chapter 726;

Alternatively:

- (c) That the Schedule 2 Disposition be set aside pursuant to Jersey customary law;

And in any event against the Second and Third Defendants:

- (d) All necessary accounts, directions and enquiries;
- (e) Further or other relief;
- (f) Costs.



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

THIS WRIT OF SUMMONS was filed by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiff, whose address for service is 3rd Floor, Queensgate House, 113 South Church Street, P.O. Box 10240, Grand Cayman KY1-1002, Cayman Islands (REF: DW11).

SCHEDULE 1

FRAUDULENT DISPOSITIONS INTO THE FIRETRUCKS TRUST BY MR CATALFUMO

(1)	04.12.08	US\$21,717,725
(2)	25.09.09	US\$1,993,797
(3)	25.09.09	US\$2,137,725
(4)	In 2010	US\$11,704
(5)	24.02.10	US\$2,000,000
(6)	08.03.10	US\$599,973
(7)	17.03.10	US\$769,973
(8)	16.04.10	US\$474,973
(9)	27.05.10	US\$750,000
(10)	28.05.10	US\$4,950,000
(11)	15.06.10	US\$20,000,000
(12)	11.11.10	US\$5,000,000
(13)	06.12.10	US\$104,827

SCHEDULE 2

**ASSETS ACQUIRED USING FUNDS FRAUDULENTLY DISPOSED BY MR
CATALFUMO INTO THE FIRETRUCKS TRUST**

The Lazzarra Motor Yacht, "Passion"
(title for which is currently vested in the Third Defendant).