

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. ²⁹⁷ OF 1997

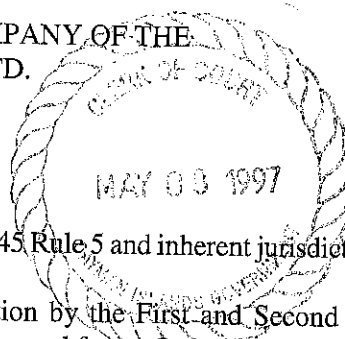
BETWEEN: (1) PARVUS COMPANY LTD.
(2) JAMIE CHIUDAN DEL ROSARIO

APPLICANTS

AND: (1) MORGAN TRUST COMPANY OF THE
CAYMAN ISLANDS LTD.

RESPONDENT

IN THE MATTER OF: RSC Order 45 Rule 5 and inherent jurisdiction of this Honourable Court
AND IN THE MATTER OF: An application by the First and Second Applicants for an Order of
Sequestration and for an Order of Committal and for further relief.



NOTICE OF ORIGINATING MOTION



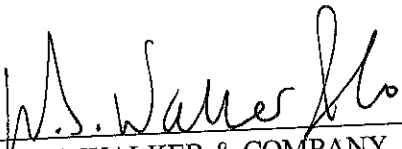
TAKE NOTICE that Mr. Justice Patterson of the Grand Court sitting at the Law Courts, George Town, Grand Cayman will be moved on the _____ day of May, 1997 at _____ o'clock in the _____ noon or as soon thereafter as counsel can be heard, by counsel on behalf of Parvus Company Ltd and counsel on behalf of Jamie Chiudan Del Rosario for Orders that the Respondent, Morgan Trust Company of the Cayman Islands Ltd. be held to be in contempt of Court and liable to sequestration of their assets and further that Ella Lockwood an officer of the said Morgan Trust Company of the Cayman Islands Ltd. be held to be in contempt of Court and liable to be committed to Northward Prison for contempt or in the alternative for such further Orders as the Court thinks fit;

AND for an Order that the costs of and incidental to this application be paid by the Respondent, Morgan Trust Company of the Cayman Islands Ltd.;

AND FURTHER TAKE NOTICE that the grounds of this application are that the Respondent, Morgan Trust Company of the Cayman Islands Ltd. has failed to comply with (a) paragraph 1 of the Order of Mr. Justice Patterson dated 1st May, 1997 which ordered you to "forthwith transfer the sum standing to the credit of account number 4057 at CIBC Bank & Trust Company (Cayman) Limited together with accrued interest to

account number 7506 at Caledonian Bank & Trust Company Limited, such account being a joint account in the names of W.S. Walker & Company and Hunter & Hunter", and (b) paragraph 2 of the said Order which ordered you to "procure that the shareholder(s) of Lascelle Limited and 11716 Corp. do transfer their respective shares to Huntlaw Nominees Ltd."

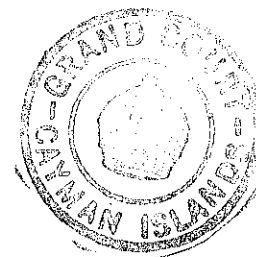
Dated this 8th day of May, 1997.


W.S. WALKER & COMPANY


HUNTER & HUNTER

TO: The Clerk of the Court;

AND TO: Ian Boxall & Co.,
CIBC Financial Centre,
P.O. Box 1234,
George Town,
Grand Cayman.



THIS NOTICE OF ORIGINATING MOTION was issued by W.S. Walker & Company and Hunter & Hunter, Attorneys-at-Law for the First and Second Applicants respectively, whose addresses for service are respectively Caledonian House, P.O. Box 265, George Town, Grand Cayman, Cayman Islands and The Huntlaw Building, P.O. Box 190 GT, George Town, Grand Cayman, Cayman Islands.