

IN THE GRAND COURT OF THE CAYMAN ISLANDS



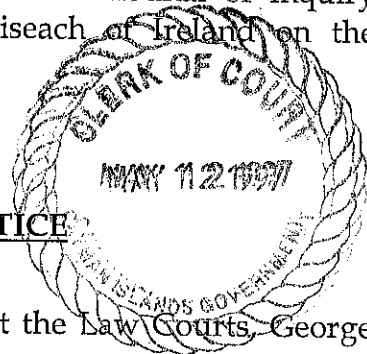
CAUSE NO. 305 OF 1997

In the Matter of the Evidence (Proceedings in Other Jurisdictions) (Cayman Islands) Order 1978

And in the Matter of Order 70 of the Grand Court Rules

And in the Matter of a Civil Matter now pending before the Tribunal of Inquiry (Dunnes Payments) appointed by instrument of An Taoiseach of Ireland on the 7th February 1997

EX PARTE APPLICATION WITH NOTICE



LET ALL PARTIES attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the 21st day of May, 1997 at 9.30 o'clock in the forenoon, on the hearing of an application by the Applicant Tribunal of Inquiry (Dunnes Payments) for an Order in the terms of the attached draft.

DATED this 12th day of May, 1997

A handwritten signature in cursive script, appearing to read "Quin & Hampson".

Quin & Hampson
Attorneys-at-Law for the Applicant

To: Ansbacher (Cayman) Limited
 Ansbacher House
 George Town
 Grand Cayman

And to: John A. Furze, Esq.
 c/o Myers & Alberga
 Attorneys-at-Law
 Midland Bank Building
 George Town
 Grand Cayman

And to: John A. Collins, Esq.
Ansbacher (Cayman) Limited
Ansbacher House
George Town
Grand Cayman

And to: Hugh Hart, Esq.
Ansbacher (Cayman) Limited
Ansbacher House
George Town
Grand Cayman

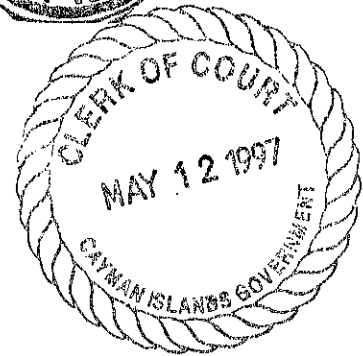
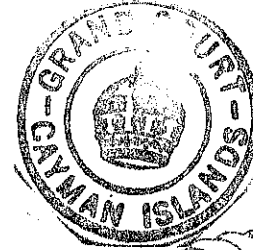
And to: Michael Day, Esq.
Ansbacher (Cayman) Limited
Ansbacher House
George Town
Grand Cayman

And to: H. Kervin Glidden, Esq.
Ansbacher (Cayman) Limited
Ansbacher House
George Town
Grand Cayman

And to: J. Maxine Everson
PO Box 1180
George Town
Grand Cayman

And to: Bryan Bothwell, Esq.
Ansbacher (Cayman) Limited
Ansbacher House
George Town
Grand Cayman

And to: The Audit Partners of KPMG (Cayman)
Genesis Building
George Town
Grand Cayman



Time Estimate: The estimated length of time for the hearing of this summons is 2 days.

This Ex Parte Application is filed by Quin & Hampson, Attorneys-at-Law for the Applicant whose address for service is Harbour Centre, Third Floor, PO Box 1348, George Town, Grand Cayman, B.W.I.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

The Honourable Mr. Justice

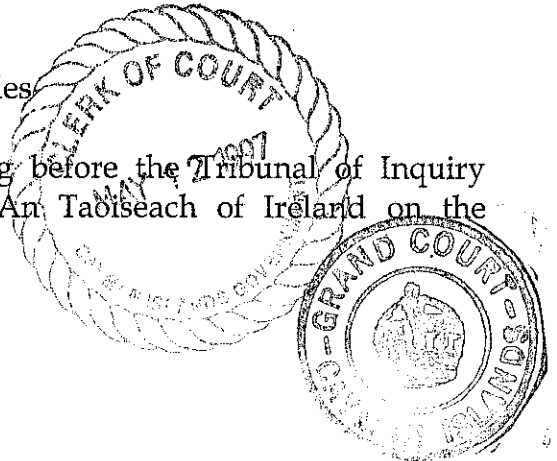
in Chambers

CAUSE NO. OF 1997

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7th February 1997



ORDER

UPON reading the affidavits of John Lawless and Charles Quin filed the day of
19 and the Request exhibited thereto

AND being satisfied that proceedings are pending before the above-captioned Tribunal
of Inquiry (Dunnes Payments) in Dublin Castle, Dublin, Republic of Ireland and that
such Tribunal wishes to obtain the testimony of the following witnesses and certain
documents pertaining thereto

- (i) the manager and/or proper officers of Ansbacher (Cayman) Ltd.;
- (ii) John A. Furze;
- (iii) John A. Collins;
- (iv) Hugh Hart;
- (v) Michael Day;
- (vi) H. Kervin Glidden;
- (vii) J. Maxine Everson;

- (viii) Bryan Bothwell; and
- (ix) the audit partner(s) of KPMG (Cayman) who had responsibility for the audit of Ansbacher (Cayman) Limited for the financial years ending in 1987-1991 inclusive and the relevant audit manager(s) in respect thereof.

IT IS ORDERED that the said witnesses do attend before the Honourable Mr. Justice Brian McCracken who is hereby appointed Examiner herein, at the offices of Quin & Hampson, on a date and time (or such other day and time) as the said Examiner may appoint, and do there submit to be examined upon oath or affirmation, touching the testimony so required as aforesaid and do then and there produce the documents set out in the Letter of Request and Schedule 2 to the Order of the Tribunal annexed thereto.

IT IS ALSO ORDERED that the said Examiner do take down or cause to be taken down in writing the evidence of the said witnesses according to the rules and practice of the Grand Court of the Cayman Islands pertaining to the examination and cross-examination of witnesses, and do request each and every witness to sign his or her deposition in the said Examiner's presence and do sign the depositions taken in pursuance of this Order, and when so completed do send them, together with this Order and the Request, to the Clerk of the Grand Court of the Cayman Islands for transmission to the Tribunal desiring the evidence of the said witnesses.

Dated this day of May, 1997

Filed this day of May, 1997

Judge of the Grand Court

This Order is filed by Quin & Hampson, Attorneys-at-Law for the Applicant whose address for service is Harbour Centre, Third Floor, PO Box 1348, George Town, Grand Cayman, B.W.I.