

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. *LN* 16 OF 2013

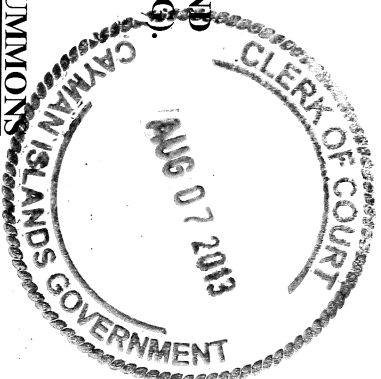
BETWEEN:

THE MINISTRY OF NATIONAL DEFENCE OF THE REPUBLIC OF CHINA (TAIWAN)  
PLAINTIFF

AND:

1. CHANG PU WANG (ANDREW WANG);
2. CHIA HSING WANG (BRUNO WANG); AND
3. CHIA JUN YEAH WANG (PAULINE WANG).

WRIT OF SUMMONS



TO: The Defendants Andrew Wang, Bruno Wang and Pauline Wang c/- their attorneys Harneys, 4<sup>th</sup> Floor Harbour Place, 103 South Church Street, Grand Cayman, 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 14 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, P.O. Box 495G, 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 7<sup>th</sup> day of August 2013.

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.

## SUMMARY OF CLAIM

The Plaintiff has a beneficial interest in funds formerly held in accounts at Bank Vontobel owned and/or controlled by the Defendants in the sum of approximately US\$48,000,000 which were paid into Court in Grand Court Cause POCL 15/2009 pursuant to an order of the Chief Justice dated 4 December 2009 therein, including any interest payments accrued in relation thereto (the "Assets"). The Plaintiff is the true beneficial owner of the Assets and seeks relief as set out below.

AND THE PLAINTIFF seeks Declarations, Orders and Directions as follows:-

1. The whole of the Assets subject of this Cause be declared to belong to the Defendant as beneficial owner thereof pursuant to a constructive trust and shall be disbursed in their entirety as directed by the Court.
2. In distributing the Assets in accordance with paragraph 1 of this Order, the Clerk of the Court be directed to pay to the Plaintiff the whole of the Assets less an amount of US\$3,246,571.35 and Singapore Dollars S\$27,741.70 paid pursuant to the Order of Quin J made 2 August 2013 in Grand Court Cause 606 of 2008 to Strategic Technologies PTE LTD (the Plaintiff in that Cause).
3. The Plaintiff reserves the right to file and serve a detailed Statement of Claim in this Cause.
4. Interest according to the Judicature Law alternatively under contract; and
5. Costs.

Dated: 7 August 2013



DIAMOND JONES

Attorneys for the Plaintiff

**Acknowledgement of writ of summons (0.12, r.3)**

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE  
OF WRIT OF SUMMONS**

1. The accompanying form of Acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person.  
  
After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.
2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).  
  
If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.  
  
If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.  
  
If the Defendant fails to serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.
3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

**See over for notes for guidance**

## Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Writ of Summons)".
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

**Please complete overleaf**

IN THE GRAND COURT OF THE CAYMAN ISLANDS

6276

CAUSE NO: OF 2013

BETWEEN:

THE MINISTRY OF NATIONAL DEFENCE OF THE REPUBLIC OF CHINA  
(TAIWAN)

PLAINTIFF

AND:

- 1. CHANG PU WANG (ANDREW WANG);
- 2. CHIA HSING WANG (BRUNO WANG); AND
- 3. CHIA JUN YEAH WANG (PAULINE WANG).

DEFENDANTS

ACKNOWLEDGMENT OF SERVICE  
OF WRIT OF SUMMONS

If you intend to instruct an Attorney to act for you, give him this form IMMEDIATELY.

|   |  |
|---|--|
| Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED. | Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside. |
|---|--|

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1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

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  2. State whether the Defendant intends to contest the proceedings (tick appropriate box)
 

|                              |                             |
|------------------------------|-----------------------------|
| <input type="checkbox"/> yes | <input type="checkbox"/> no |
|------------------------------|-----------------------------|

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  3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)
 

|                              |                             |
|------------------------------|-----------------------------|
| <input type="checkbox"/> yes | <input type="checkbox"/> no |
|------------------------------|-----------------------------|
- 

Service of the Writ is acknowledged accordingly

(Signed).....

Attorney for Defendants

**Notes on address for service**

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communications for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Indorsement by plaintiff's Attorney (or by plaintiff if suing in person) of his name, address and reference, if any, in the box below.

DIAMOND JONES  
Grand Pavilion Commercial Centre  
802 West Bay Road  
George Town  
PO Box 2887  
Grand Cayman, KY1-1112  
Ph. 769-9352  
E-mail:  
[stuart.diamond@diamondjones.ky](mailto:stuart.diamond@diamondjones.ky)

Indorsement by defendant's Attorney (or by defendant if suing in person) of his name, address and reference, if any, in the box below.

Harneys  
4<sup>th</sup> Floor Harbour Place  
103 South Church Street  
Grand Cayman  
Cayman Islands