

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. *370* OF 1997

BETWEEN: **LISA MERNIN McLEAN** Plaintiff

AND: **KEITH RICHARD KELLER** Defendant

WRIT OF SUMMONS

To: Richard Keith Keller
c/o Neptune Divers
George Town
Grand Cayman.



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 495, 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 *11th* day of *June*, 1997.

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.

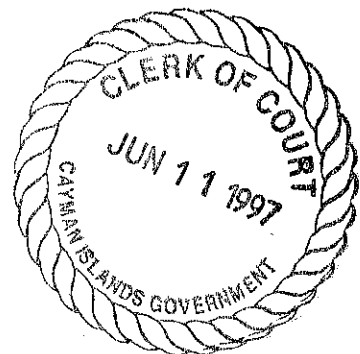
STATEMENT OF CLAIM

AND THE PLANTIFF claims:-

1. The Plaintiff is a U.S. citizen who now lives in the Cayman Islands. The Plaintiff's former name was Lisa Mernin. She has re-married and now goes by the name of Lisa Mernin McLean. The Defendant is a U.S. citizen who works and is resident in the Cayman Islands. The Plaintiff and Defendant were formally married .
2. The Plaintiff's claim is for the sum of US\$30,000.00 being a debt owed by the Defendant to the Plaintiff .
3. After finding that the Plaintiff and the Defendant had submitted to its jurisdiction, the 285th District Court, Bexar County, Texas, U.S.A. entered a Final Decree of Divorce on the 7th February, 1996 wherein the Plaintiff was awarded certain property. Such property was set out in an order dated the 7th February, 1996.
4. By an Order of the same said Texas Court entitled "Order For Enforcement of Decree of Divorce" which said Order was signed by the Presiding Judge and dated the 7th October, 1996 (The Enforcement Order) certain enforcement measures were ordered by the said Court.
5. Paragraph 9 of the said Enforcement Order stated that "...if after 60 days the property cannot be found, that Lisa Mernin shall have judgment against Keith Richard Keller in the amount of US\$30,000.00 plus interest from the date of this Order . If the property is subsequently found and delivered to Lisa Mernin a credit against the judgment in the amount equal to the value of the property at the time it is found and turnover to Lisa Mernin shall be made."
6. The 60 day period referred to in paragraph 9 of the said Order expired in December, 1996. At no time during the said period or at any time thereafter has the Defendant delivered up any property owing to the Plaintiff. Accordingly, the Defendant has failed to comply with the Order and the judgment has thereby arisen.

PARTICULARS OF DEBT

US\$30,000.00 being the amount ordered by the 285th District Court.

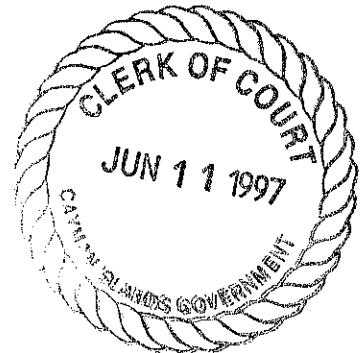


PARTICULARS OF INTEREST

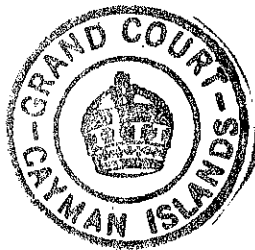
Interest from 8th October, 1996 to the 30th April, 1997 at a rate to be determined by this Honourable Court. If this Honourable Court believes that the appropriate rate is the statutory rate then as at the 30th April, the interest accruing amounted to US\$1,232.21 being 203 days at \$6.07 per day. Interest accrues thereafter at the same rate of CI\$6.07 per day.

AND THE PLAINTIFF CLAIMS against the Defendant:-

1. The Sum of US\$30,000.00;
2. Interest on the said sum aforesaid at such rate as this Honourable Court shall deem just or at the statutory rate of 7-3/8% from the 8th October, 1996 until judgment or sooner payment at a daily rate of CI\$6.07 per day;
3. Further interest aforesaid from the date of judgment until payment;
4. Costs;
5. Further or other relief.



DATED this day of June, 1997



Quin & Hampson
Quin & Hampson
Attorneys at Law for the Plaintiff

THIS WRIT was filed by Messrs. Quin & Hampson, Attorneys-at-Law for and on behalf of the Plaintiff herein whose address for service is that of her said Attorneys-at-Law, Harbour Centre, Third Floor, P.O. Box 1348, George Town, Grand Cayman.