

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO: FSD 3 OF 2014 (AJEF)

BETWEEN:

- (1) TETRAGON FINANCIAL GROUP LIMITED
- (2) TETRAGON FINANCIAL MANAGEMENT LP

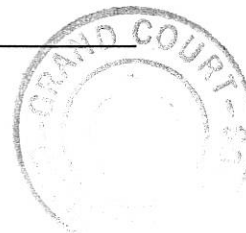
Plaintiffs

AND

- (1) BRIT UW LTD (AS SOLE REPRESENTATIVE OF LLOYD'S SYNDICATE
BRT 2987 FOR THE 2010 YEAR OF ACCOUNT)
- (2) CHAUCER SYNDICATES LIMITED (REPRESENTING LLOYD'S
SYNDICATE CSL 1084 FOR THE 2010 YEAR OF ACCOUNT)
- (3) AIG EUROPE LIMITED

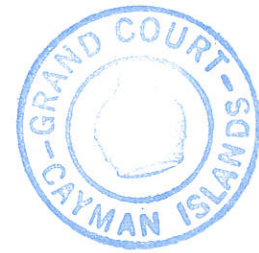
Defendants

ORDER



IT IS HEREBY ORDERED BY CONSENT that:

- 1 The Plaintiffs may file an Amended Reply and Defence to Counterclaim by 17 April 2015.
- 2 Discovery is to be made by 19 June 2015, with inspection by 26 June 2015.
- 3 Witness statements, and hearsay notices where required, shall be exchanged simultaneously by 18 September 2015.
- 4 Reply witness statements (if any) shall be exchanged simultaneously by 16 October 2015.
- 5 Unless otherwise ordered, witness statements are to stand as the evidence in chief of the witnesses at trial.



6 Signed reports of experts:

6.1 Shall be confined to a maximum of two experts for the Plaintiffs and two experts for the Defendants, being (i) a legal professional and/or (ii) an expert in legal costs analysis.

6.2 Shall be confined to the following issues (i) the nature, reasonableness and necessity of the costs in respect of which the Plaintiffs claim in these proceedings including the practices and procedures of the New York court in connection with shareholder derivative proceedings and motions to dismiss, US law relating to the pleaded causes of action and relevant features of the market for legal services in New York; and (ii) relevant principles of construction and the implication of terms.

6.3 Shall be exchanged simultaneously by 13 November 2015.

7 The parties shall serve any expert evidence on which they intend to rely in response to the expert evidence served pursuant to paragraph 6 above by 18 December 2015.

8 A joint meeting of the experts (or joint meetings if convenient for the experts to split themselves into pairs and experts of like disciplines), in person or via telephone shall be arranged and conducted prior to 15 January 2016. Following the joint meeting(s), by 29 January 2016 the experts shall produce a joint memorandum (or joint memoranda if convenient for the experts to split themselves into pairs of experts of like disciplines) of:

8.1 Those matters on which the experts agree; and

8.2 Those matters on which the experts disagree with summary reasons for such disagreements.

9 If the experts' reports cannot be agreed, the parties are to be at liberty to call expert witnesses at the trial, limited to those experts whose reports have been exchanged pursuant to paragraph 6 above.

10 By no later than 5 February 2016, the parties shall arrange with the assigned Judge the date for trial, which shall commence on the first available date on or after 11 April 2016 with a provisional time estimate of 6 days, including one day pre-trial reading time.

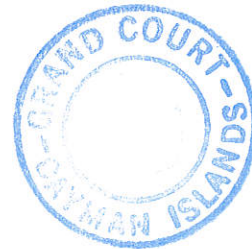
- 11 The Plaintiffs shall file and serve agreed trial bundles in accordance with the FSD Guide by no later than 21 days in advance of trial.
- 12 The parties shall exchange and file Skeleton Arguments and authorities no later than 7 days in advance of trial.
- 13 There is to be a pre-trial review not earlier than 15 February 2016.
- 14 Save as varied by this or further Order, the practice and procedures set out in the FSD Guide are to be followed.
- 15 Costs in the cause.
- 16 Liberty to apply.

DATED the 13th day of April 2015

FILED the 13th day of April 2015



**THE HON. JUSTICE ANGUS FOSTER
JUDGE OF THE GRAND COURT**



Approved as to form and content

Maples and Calder

Maples and Calder
Attorneys for the Plaintiffs

Campbell

Campbells
Attorneys for the Defendants

