

IN THE GRAND COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

CAUSE NO. FSD 24 OF 2013 (AFJ)

In Chambers

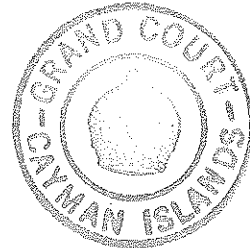
25 and 28 April 2014

BEFORE THE HONOURABLE MR JUSTICE ANGUS FOSTER

IN THE MATTER OF THE COMPANIES LAW (2013 REVISION)

AND IN THE MATTER OF MOBILEPEAK HOLDINGS, LTD.

ORDER



UPON hearing Counsel for MobilePeak Holdings Ltd (the **Company**) upon its Summons dated 22 April 2014 (the **Company Summons**) and Counsel for Shawn Lee, Cheng Gang, Xia Zhang, Tao Wang, Xiaoqin Zhang, Yibing Xue, Bo Zhang, Di-Na Li and Qin Chen (the **Petitioners**)

AND UPON a request by the Petitioners, pursuant to the Court's pre-trial review and Order 38 rule 3 of the Grand Court Rules, for specific disclosure of documents by the Company

AND UPON an undertaking being given by Mr. Paul Girolami QC (being Leading Counsel for the Petitioners) and Mr. Tony Heaver-Wren (being the partner of Appleby (Cayman) Ltd. with conduct of this matter on behalf of the Petitioners) in the terms set out in the schedule to this Order (the **Undertaking**);

IT IS ORDERED THAT:

1. The Company shall immediately disclose to the Petitioners copies of the Gartner Reports relied upon in the witness statements filed by the Company.
2. Immediately upon the Undertaking being given in writing, the Company shall disclose to the Petitioners unredacted copies of the Share Purchase Agreements dated December 2011 and May 2012.
3. The parties shall file their skeleton arguments and a bundle of agreed authorities by 30 April 2014.
4. Upon the Undertaking being given in writing, the Company shall disclose to the Petitioners copies of all portions of the Company's employment records relied upon in the witness statements filed on behalf of the Company on a rolling basis, as translations of the extracts relied upon become available, with full disclosure of such translations to be provided to the Petitioners by 1 May 2014.
5. The Company shall file a supplemental witness statement of Mr. James Lui by 1 May 2014.

6. The parties file any supplemental skeleton arguments, being strictly limited to the matters referred to in the supplemental witness statement of Mr. James Lui, by 12 noon on 5 May 2014.
7. The hearing of this cause commence at 10:00am on Tuesday 6 May 2014.
8. Costs in the cause.

SCHEDULE - Undertaking

I provide the following undertaking.

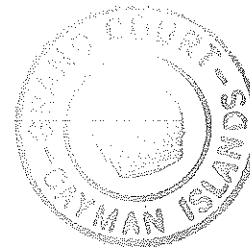
1. In my capacity as a Partner of Appleby (Cayman) Ltd, being the attorneys for the Petitioners in Cause number FSD 24 of 2013 (AFJ), and on behalf of Paul Girolami QC, being Leading Counsel for the Petitioners in those proceedings, I hereby undertake that, in accordance with the directions of Justice Foster on 25 April 2014, upon production of the documents set out in clause 3, below (together the **Documents**), by MobilePeak Holdings Ltd, the Documents shall be seen and reviewed by Paul Girolami QC, myself and those staff of Appleby (Cayman) Ltd who are assisting me in this matter, and no other party. Without limiting the generality of this undertaking, the Documents shall not be provided, in any form, to Shawn Lee, any of the Petitioners or Broad & Bright, the Petitioners' Chinese legal advisors. This undertaking shall apply to the Documents in electronic and physical form.
2. As soon as practicable after receipt of the Documents, the Documents shall be transferred to a place of electronic storage with the ability to track and provide a report on all and any electronic access to the Documents, so stored. MobilePeak Holdings Ltd shall, at any time upon provision of reasonable notice, be entitled to request and receive as soon as practicable the electronic access log for the Documents.
3. The Documents provided subject to the above undertaking shall be:
 - a. Unredacted copies of the Share Purchase Agreements dated December 2011 and May 2012;
 - b. Copies of all portions of the Company's employment records relied upon in the witness statements filed on behalf of the Company.

Dated this 28th day of April 2014

Filed this 14 day of May 2014



The Hon Mr. Justice Angus Foster
Judge of the Grand Court



THIS ORDER was filed by Appleby (Cayman) Ltd., Attorneys-at Law for the Petitioners, whose address for service is Clifton House, 75 Fort Street, PO Box 190, Grand Cayman KY1-1104, Cayman Islands (Ref. THW/ AJ/421005.0001).

Agreed as to form and content.

Appleby (Cayman) Ltd
Appleby (Cayman) Ltd
Attorneys for the Petitioners

Sinclair
Sinclair
Attorneys for MobilePeak Holdings Ltd.

