

AMENDED ORIGINATING SUMMONS dated 23 July 2014
Amended pursuant to GCR O.20, r.1

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD 71 OF 2014 (AJJ)

IN THE MATTER OF SECTION 46 OF THE COMPANIES LAW (2013 REVISION)

AND IN THE MATTER OF CITRUSCOM CORPORATION

BETWEEN:

ALBERT ZIHUI WANG

(1) **QIN BO**

(2) **ZHANG NAN**

(3) **WANG SHIJUN**

(4) **YAO FEI**

PLAINTIFFS

AND:

(1) **CITRUSCOM CORPORATION**

(2) **WU WEN-CHIN**

DEFENDANTS

AMENDED ORIGINATING SUMMONS

LET THE **FIRST DEFENDANT** of Offshore Incorporations (Cayman) Limited, PO Box 2804, 4th Floor Willow House, Cricket Square, Grand Cayman KY1-1112 **AND THE SECOND**

DEFENDANT of C/o Ogier, 89 Nexus Way, Camana Bay, Grand Cayman KY1-9007 attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the 7th day of October 2014, at 10:00 am/pm on the hearing of an application by the Plaintiffs of C/o 56 Boulder Creek Way, Irvine, California 92602, United States of America that:

1. Pursuant to section 46 of the Companies Law (2013 Revision), the Register of Members of the **First** Defendant be rectified by entering the following persons as holders of the following shares:

| | |
|-------------|-------------------------|
| Qin Bo | 430,450 ordinary shares |
| Zhang Nan | 430,450 ordinary shares |
| Wang Shijun | 430,450 ordinary shares |
| Yao Fei | 286,967 ordinary shares |

2. Notice of such rectification be given to the Registrar of Companies.
3. The costs of this Originating Summons be paid by the Defendants.
4. Such further or other orders as the Court thinks fit.

AND FURTHER TAKE NOTICE THAT the particulars by which the Plaintiffs claims the above relief are as follows:

- A. The Plaintiffs are four graduate students from Tsinghua University, Beijing, and were the co-founders of the **First** Defendant. ~~is a member of the Defendant holding 5,038,034 shares in the Defendant, which equates to approximately 42.22% of the Defendant's issued capital.~~
- B. The **First** Defendant was incorporated as a Cayman Islands exempted company on 6 April 2010.
- C. The directors of the **First** Defendant are **Albert Zihui Wang** and the **Second** Defendant. ~~the Plaintiff and Wu Wen-Chin.~~

- ~~D.~~ The founders of the Defendant were the Plaintiff and four graduate students from Tsinghua University, Beijing, being Qin Bo, Zhang Nan, Wang Shijun, and Yao Fei (together the “Engineers”).
- ED. In early 2012, it was agreed between the First Defendant and the PlaintiffsEngineers that (i) each of the First, Second, and Third PlaintiffsQin Bo, Zhang Nan and Wang Shijun would own a 3% stake in the First Defendant, and (ii) the Fourth PlaintiffYao Fei would own a 2% stake in the First Defendant. This equated to (i) 300,000 ordinary shares for each of the First, Second, and Third PlaintiffsQin Bo, Zhang Nan and Wang Shijun, and (ii) 200,000 ordinary shares for the Fourth PlaintiffYao Fei.
- FE. The PlaintiffsEngineers accepted their stake in the First Defendant in the form of share options through their membership in the First Defendant’s employee stock option plan, instead of immediately having their names registered on the First Defendant’s Register of Members.
- GF. On 8 October 2012, the First Defendant issued a letter to each of the PlaintiffsEngineers (together the “Allotment Letters”) confirming that (i) the First, Second, and Third PlaintiffsQin Bo, Zhang Nan and Wang Shijun had each been allotted 300,000 shares (3% stake) in the First Defendant, and (ii) the Fourth DefendantYao Fei had been allotted 200,000 shares (2% stake) in the First Defendant (together the “Allotted Shares”).
- HG. The Allotment Letters confirmed that the Allotted Shares had fully vested in the PlaintiffsEngineers. However, the Allotment Letters stated that the formalities for registration of the PlaintiffsEngineers as shareholders of the First Defendant would be completed during the second phase of the First Defendant’s registration process.
- IH. The second phase of the First Defendant’s registration process comprised the second phase of the First Defendant’s venture capital raising to, amongst other things, expand its business operations with the aim of undergoing an initial public offering in future (the “IPO Funding”).

Jl. The IPO Funding was completed in December 2012 following which the ~~Plaintiffs'Engineers'~~ entitlement to shares in the First Defendant increased from 300,000 and 200,000 shares to 430,450 and 286,967 shares respectively.

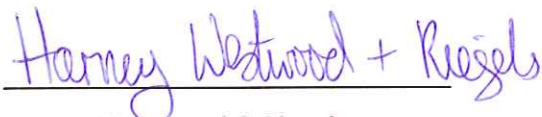
KJ. The second phase of the First Defendant's registration process was completed in January 2013, at which time the ~~PlaintiffsEngineers~~ were entitled to be, and should have been, registered on the First Defendant's Register of Members as legal owners of the Allotted Shares pursuant to the Allotment Letters.

LK. ~~The Second DefendantWu-Wen-Chin~~, as one of two directors of the First Defendant, refuses to take the necessary steps or pass the necessary resolutions to issue the Allotted Shares to the ~~PlaintiffsEngineers~~. As a result of such refusal by ~~the Second DefendantWu-Wen-Chin~~, the Allotted Shares have not been issued to the ~~PlaintiffsEngineers~~.

ML. In the circumstances, the First Defendant's Register of Members should be rectified immediately to reflect that the ~~PlaintiffsEngineers~~ are the holders of the Allotted Shares.

AND LET THE DEFENDANTS within fourteen (14) days after service of this Summons on ~~themhim~~ counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, PO Box 495, George Town, Grand Cayman KY1-1106, Cayman Islands.

Dated this 8th 23rd day of July 2014



Harney Westwood & Riegels
Attorneys-at-Law for the Plaintiffs

- NOTES:**
- 1 This Summons may not be served later than four (4) calendar months (or, if leave is required to effect service out of jurisdiction, six (6) months) beginning with the above date unless renewed by order of the Court.
 - 2 If a defendant does not attend personally or by his attorney at the time and place above-mentioned such order will be made as the Court may think just and expedient.

IMPORTANT

Directions for Acknowledgment of Service are given with the accompanying form.

THIS AMENDED ORIGINATING SUMMONS was issued by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiffs, whose address for service is 4th Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002, Cayman Islands (Ref: **AL/JNW/045960.0002**).

DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE OF ORIGINATING SUMMONS

The accompanying form of Acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendant[s] or by the Defendant[s] if acting in person. After completion it must be delivered or sent by post to the Law Courts, PO Box 495, George Town, Grand Cayman KY1-1106, Cayman Islands.

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 If you wish to defend claims made in the originating summons, or intend to attend the proceedings and to participate in them so far as necessary (although not necessarily in an adversarial manner) you should tick the “Yes” box in paragraph 2 of the Acknowledgment of Service.
- 3 For the purpose of calculating the period of fourteen (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.
- 4 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 Originating Summons)”.
- 5 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 “Partner in the firm of (.....)” after his name.
- 6 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.
- 7 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.

- 8 Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
- 9 A Defendant acting in person may obtain help in completing the form at the Courts Office.

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DEFENDANTS

ACKNOWLEDGMENT OF SERVICE OF ORIGINATING 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.**

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

2. State whether the Defendant intends to contest or otherwise participate in the proceedings (tick appropriate box)

YES NO

Service of the Originating Summons is acknowledged accordingly.

[Attorney] for

[Defendant in Person]

Address for Service:

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 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.

Harney Westwood & Riegels

4th Floor, Harbour House

103 South Church Street

PO Box 10240

Grand Cayman KY1-1002

Cayman Islands

(Ref: AL/JNW/045960.0002)

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

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