

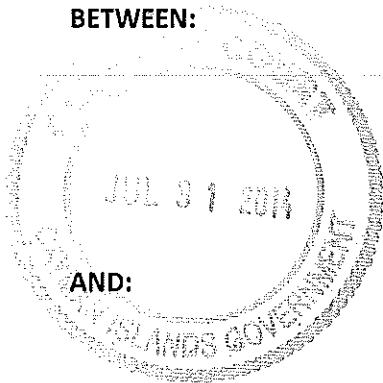
IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD ⁶⁰⁸⁵ OF 2014

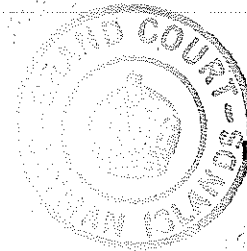
IN THE MATTER OF SECTION 46 OF THE COMPANIES LAW (2013 REVISION)

AND IN THE MATTER OF CITRUSCOM CORPORATION

BETWEEN:



- (1) WANG FEI
- (2) SUN SHUANGXI



PLAINTIFFS

AND:

- (1) CITRUSCOM CORPORATION
- (2) WU WEN CHIN
- (3) WU CHENG HSUAN

DEFENDANTS

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 AND THE THIRD DEFENDANT of 9th Floor, No. 88, Section 1, Nanchang Road, Zhongzheng District, Taipei City, Taiwan attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the day of 2014, at 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 "Law"), the Register of Members of the First Defendant be rectified by:
 - a. striking out the name of Wu Cheng-Hsuan in respect of the shares in the First Defendant held by him (the "Shares"); and
 - b. inserting in lieu of Wu Cheng-Hsuan, the names of Wang Fei and Sun Shuangxi as holders of the Shares in the following proportions:

Wang Fei	938,757 ordinary shares
Sun Shuangxi	197,218 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 Defendant.
4. Such further or other orders as the Court thinks fit.

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

- A. The First Defendant was incorporated as a Cayman Islands exempted company on 6 April 2010.
- B. The directors of the First Defendant are Albert Zihui Wang and the Second Defendant.
- C. In October 2012, the First Defendant sought to raise venture capital for, amongst other things, a proposed initial public offering. The First Plaintiff invested US\$476,000 and the Second Plaintiff invested US\$100,000 in the First Defendant, in consideration for the Shares.
- D. At all times the Plaintiffs were the beneficial owners of the Shares.
- E. The Plaintiffs are Chinese citizens. Under Chinese law there are certain restrictions in place on Chinese citizens holding monetary assets, including equity, in a foreign company.

- F. Due to the Chinese law restrictions the Plaintiffs could not be named on the register of members of the First Defendant. Accordingly, the Second Defendant arranged for the Shares to be issued to the Third Defendant, to be held on trust for the Plaintiffs pursuant to the terms of two nominee shareholding agreements dated 7 November 2013 entered into between the Plaintiffs and the Second and Third Defendants respectively (the "**Trust Agreements**").
- G. The Trust Agreements provide, inter alia, that the Third Defendant will hold the Shares on trust for the benefit of the Plaintiffs, that the Third Defendant will endeavour to protect the Plaintiffs' legitimate interests, and that the Third Defendant shall not enjoy any rights associated with the Shares but that such rights are reserved for the Plaintiffs.
- H. On 12 June 2014 the Plaintiffs wrote to the Third Defendant, with a copy of the letter also being sent to the Second Defendant and the First Defendant, pursuant to the terms of the Trust Agreements, giving notice to terminate the Trust Agreements and requesting that the Shares are transferred to each of the Plaintiffs in their respective proportions. On receipt of such letters, the Third Defendant was obliged to execute the requisite share transfer forms as transferor, in favour of each of the Plaintiffs as transferees. Accordingly, since 12 June 2014 the Plaintiffs are entitled to be, and should have been, registered on the First Defendant's Register of Members as legal owners of the Shares.
- I. The Second Defendant, in breach of the Trust Agreements, as transferor, refuses to execute the necessary share transfer forms. Moreover, the Second Defendant, as one of two directors of the First Defendant, also refuses to take the necessary steps or pass the necessary resolutions to register the transfer of the Shares to the Plaintiffs. As a result of such refusal by the Third Defendant, the Shares have not been transferred to the Plaintiffs and their names erroneously remain excluded from the Register of Members of the First Defendant.

AND LET THE DEFENDANTS within fourteen (14) days after service of this Summons on them 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 31st day of July 2014

Harney Westwood & Riegels

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 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: JNW/JGW/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.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD OF 2014 (AJJ)

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

AND IN THE MATTER OF CITRUSCOM CORPORATION

BETWEEN:

(3) WANG FEI

(4) SUN SHUANGXI

PLAINTIFFS

AND:

(4) CITRUSCOM CORPORATION

(5) WU WEN CHIN

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: JNW/JWW/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.