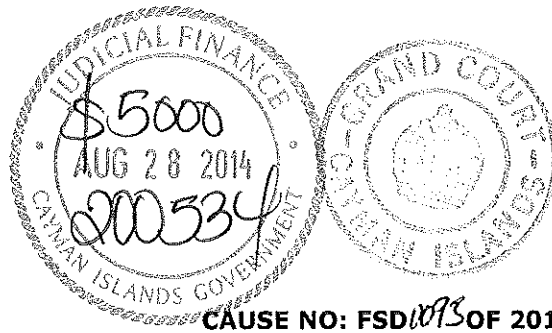


**IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION**

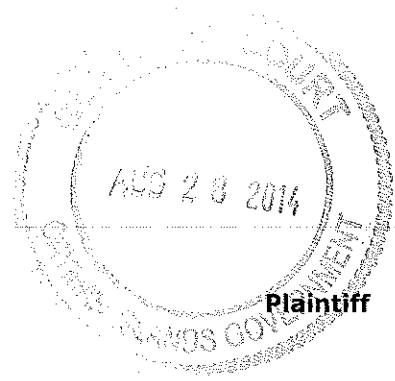


CAUSE NO: FSD1093 OF 2014

**IN THE MATTER OF ESSAR GLOBAL FUND LIMITED
AND IN THE MATTER OF THE COMPANIES LAW (2013 REVISION)**

BETWEEN:

ESSAR GLOBAL FUND LIMITED



Plaintiff

- and -

TRAVIS COAL RESTRUCTURED HOLDINGS LLC

Defendant

ORIGINATING SUMMONS

TO: Travis Coal Restructured Holdings LLC
c/o Denham Capital Management LP
200 Clarendon Street, 25th Floor
Boston, MA 02116
USA

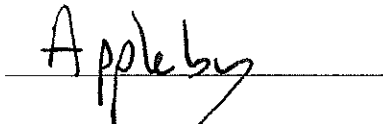
LET THE DEFENDANT, within 14 days after service of this Summons on it, counting the day of service, return the accompanying Acknowledgement of Service to the Courts Office, PO Box 495g, George Town, Grand Cayman.

By this Summons, which is issued on the application of Essar Global Fund Limited of c/o Appleby (Cayman) Ltd. Clifton House, 75 Fort Street, PO Box 190, George Town, Grand Cayman, Cayman Islands, KY1-1104, the Plaintiff seeks the following orders:

1. That Travis Coal Restructured Holdings LLC (**the Defendant**) be restrained, whether by itself, or by its servants or agents or otherwise, from presenting a petition to this Honourable Court, or any Court, for the winding up of the Plaintiff based on a foreign arbitration award dated 7 March 2014 or an English Judgment debt dated 26 March 2014 as claimed in a statutory demand served on the Plaintiff by the Defendant pursuant to section 93 of the *Companies Law* (2013 Revision) on 7 August 2014.
2. The costs of this action be paid by the Defendant to the Plaintiff.
3. Such further order or other relief as this Honourable Court deems fit.

If the Defendant does not acknowledge service, such Judgment may be given or order made against or in relation to him as the Court may think just and expedient.

Dated this 28th day of August 2014



Appleby (Cayman) Ltd.

Attorneys-at-Law for the Plaintiff

NOTE – This Summons may not be served later than 4 calendar months (or, if leave is required to serve out of the jurisdiction, 6 months) beginning with that date unless renewed by order of the Court.

IMPORTANT

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

THIS ORIGINATING SUMMONS was Issued by Appleby (Cayman) Ltd., Attorneys-at-Law for the Plaintiff, whose address for service is Clifton House, 75 Fort Street, PO Box 190, George Town, Grand Cayman, Cayman Islands KY1-1104 (Ref: THW/JHS/311102.00074).

**DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE
OF ORIGINATING SUMMONS**

The accompanying form of Acknowledgement of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person. After completion it must be delivered or sent by post to the Law Courts, PO BOX 495g, George Town, Grand Cayman.

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement 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 acknowledgement of service.
3. For the purpose of calculating the period of 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 the description "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

IN THE MATTER OF ESSAR GLOBAL FUND LIMITED

AND IN THE MATTER OF THE COMPANIES LAW (2013 REVISION)

BETWEEN:

ESSAR GLOBAL FUND LIMITED

Plaintiff

- and -

TRAVIS COAL RESTRUCTURED HOLDINGS LLC

Defendant

**ACKNOWLEDGEMENT 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

_____ Date:

Attorney for Defendant

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 or principal office.

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

Appleby (Cayman) Ltd.
Attorneys-at-Law
Clifton House
75 Fort Street
PO Box 190
George Town
Grand Cayman KY1-1104
Ref: THW/PK/311102.00074

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

[Empty box for Defendant's Attorney endorsement]