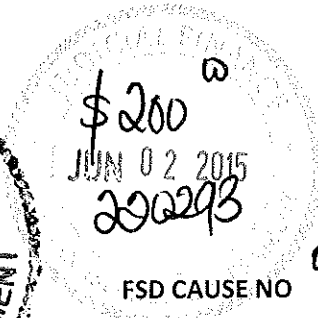
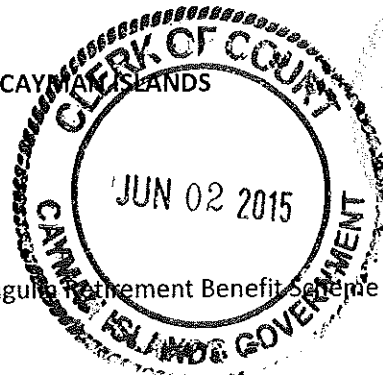


IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION

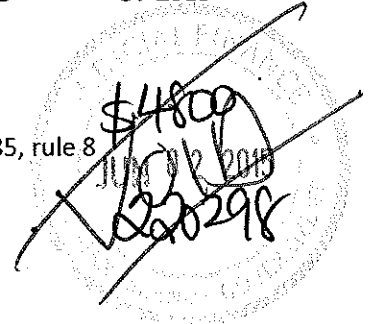


0085.



IN THE MATTER OF the Vlad Ragulin Retirement Benefit Scheme

AND IN THE MATTER OF section 48 of the Trusts Law (2011 Revision) and GCR Order 85, rule 8



ORIGINATING APPLICATION

We, Intertrust Trustees (Cayman) Limited, 190 Elgin Avenue, George Town, Grand Cayman, Cayman Islands, being the present trustee of the Vlad Ragulin Retirement Benefit Scheme hereby apply to a Judge of the Grand Court seeking its determination on the following questions respecting the management and/or administration of the said trust and the following relief pursuant to GCR Order 85, rule 8:

1. Directions as to whether the trust is subject to the jurisdiction of the Cayman Islands Grand Court;
2. Directions as to whether rectification of the trust deed is necessary in order to clarify the identity of the beneficiaries of the trust and, if it is necessary, such rectification;
3. Directions as to whether the sanction of the Grand Court is necessary in order for the current trustee to resign and for a replacement trustee to be appointed and, if its approval is necessary, directions to facilitate this transfer;
4. All further and necessary orders and directions as this Court shall think fit, including, if necessary, directions as to service and/or notification of these proceedings to any other person;
5. That the Trustee's costs of this application be paid out of the Trust Fund on the indemnity basis; and
6. Such further or other relief.

This application is supported by -

1. The written submissions drafted by Benjamin Tonner of Samson & McGrath, Attorneys for the Trustees, dated the 25 day of May, 2015; and
2. An Agreed Statement of Facts signed by or on behalf of both the Trustees and Vlad Ragulin (the 'member' and primary adult beneficiary of the said trust).

Dated this        day of                    , 2015

Samson & McGrath

Samson & McGrath

Attorneys-at-Law for the Trustee Plaintiff

**Time estimate:** On the papers.

This Originating Application was filed by Samson & McGrath whose address for service is 5th Floor, Genesis Building, George Town, Grand Cayman, Cayman Islands, Attorneys for the Applicants.