

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 502 OF 1997

BETWEEN: ROBERT OWEN MOYLE PLAINTIFF
AND: EDNA MARIE MOYLE DEFENDANT

WRIT OF SUMMONS

JUN. 30. 1997

TO: Edna Marie Moyle, P.O. Box 208, North Side, Grand Cayman.

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the next page.

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P. O. Box 495, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

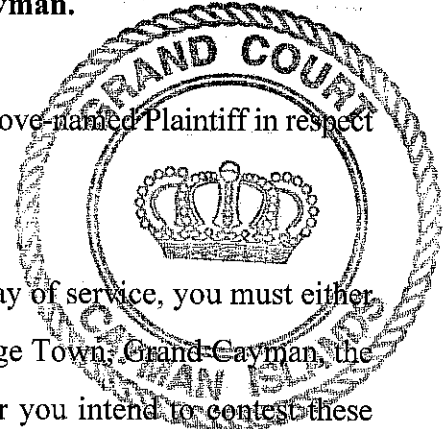
If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this ³⁰ day of June 1997.

NOTE : This Writ may not be served later than four calendar months beginning with the date of issue unless renewed by order of the Court.

-IMPORTANT-

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



IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 502 OF 1997

BETWEEN: ROBERT OWEN MOYLE PLAINTIFF
AND: EDNA MARIE MOYLE DEFENDANT

STATEMENT OF CLAIM

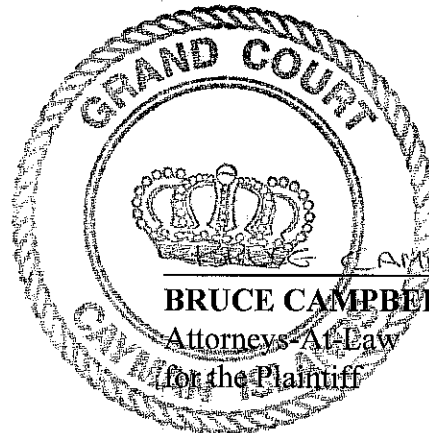
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1. By a written deed dated 18th September 1983 ("the guarantee") the Plaintiff and the Defendant jointly and severally covenanted with Washington International Bank and Trust Ltd, now known as Bank of Butterfield International (Cayman) Ltd ("the Bank"), that in consideration of the Bank lending monies to Universal Consultants Ltd ("Universal") a company formerly incorporated pursuant to the Companies Law (Chapter 22) of the Cayman Islands, they would guarantee repayment to the Bank for the liabilities, whether direct, contingent or otherwise, which Universal incurred to the Bank from time to time.
2. On 20th September 1996 the Bank commenced an action in the Grand Court against the Plaintiff and the Defendant under cause no. 492 of 1996 as joint and several guarantors under the guarantee to recover payment from the Plaintiff and the Defendant of monies owed to it by Universal, whereupon the Bank obtained judgement in the said action against the Plaintiff on 6th March 1997 in the sum of US\$118,059.14 together with interest and costs.
3. In enforcement of the said guarantee and the said judgement referred to in paragraph 2 herein, and in full satisfaction of the said guarantee, on or about 15th May 1997 the Plaintiff repaid to the Bank the sum of US\$134,145.93.
4. The Defendant has not paid any sum to the Bank under the terms of the said guarantee or to the Plaintiff as contribution thereunder.

Wherefore the Plaintiff claims:

1. Judgement against the Defendant in the sum of US\$67,072.96 by way of contribution as co-surety.
2. Pre-judgement interest on such judgment sum in accordance with section 34 of the Judicative Law (1995 Revision) at the rate of 7.3/8 % per annum pursuant to the Judgment Debts (Rates of Interest) Rules 1996 from 15th May 1997 until judgment being US\$13.55 per day.
3. Post-judgement interest on such judgment sum in accordance with section 34 of the Judicative Law (1995 Revision) at the rate of 7 3/8 % per annum pursuant to the Judgment Debts (Rates of Interest) Rules 1996 from the date of judgment to the date of payment of the judgment sum being US\$13.55 per day.
4. Such further or other relief.
5. Costs.

DATED this 27th day of June 1997.



If within the time for returning the Acknowledgment of Service, the defendant pays the total amount claimed of US \$67,072.96 together with fixed costs of US \$609.75 and interest, as at 27th June 1997, of US \$582.75 for a total sum of US \$68,265.46 further proceedings will be stayed. The money must be paid to the Plaintiff or his attorney.

THIS WRIT is filed by Messrs Bruce Campbell & Co, Attorneys-at-Law for the Plaintiff herein, whose address for service is Fourth Floor, Bank of Nova Scotia Building, PO Box 884, George Town, Grand Cayman (Telephone 949-2648 Facsimile 949-8613)