

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

0161
FSD CAUSE NO: OF 2015 ()

IN THE MATTER OF a Deed of Settlement dated 20 December 2007 made between Pan Marcus and HSBC International Trustee Limited (the "Trust Deed") constituting the Pan Family Trust (the "Trust")

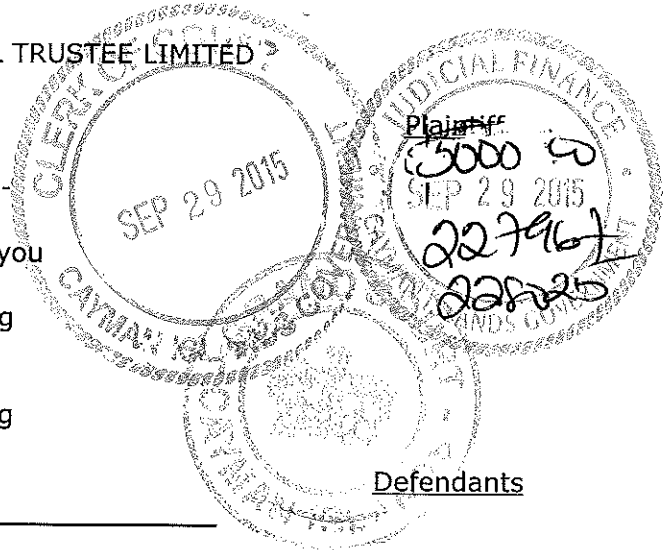
AND IN THE MATTER OF the Trusts Law (2011 Revision) and GCR Order 85, Rule 2

BETWEEN

HSBC INTERNATIONAL TRUSTEE LIMITED

-and-

- (1) Kuang Shunyou
- (2) Shao Lidan
- (3) Pan Zhaolong
- (4) Pan Xiaoyu
- (5) Pan Yulong
- (6) Pan Xieguang



Defendants

ORIGINATING SUMMONS

LET ALL PARTIES CONCERNED attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman, Cayman Islands on the day of 2015, at am/pm.

By this Originating Summons, which is issued on the application of the Plaintiff, HSBC International Trustee Limited of Craigmuir Chambers, Road Town, PO Box 71, British Virgin Islands, as trustee of the Trust, against the Defendants (who are all beneficiaries of the Trust), the Plaintiff seeks the determination of the Court to the following questions and the following orders and directions pursuant to GCR Order 85, Rule 2(2)(a):


- 1. Directions as to whether the Plaintiff should take part in the proceedings commenced

in the District Court of the Hong Kong Special Administrative Region ("Hong Kong") (Matrimonial Causes No: FCMC 14433/2014) (or as it may be transferred) (the "Main Proceedings") and/or submit to the jurisdiction of the Hong Kong Court, and if so to what extent including but not limited to defending or appealing any decision arising in the Main Proceedings if necessary.

2. In the event that the Plaintiff is directed not to submit to the jurisdiction of the Hong Kong Court, a specific direction that the Plaintiff do apply in the Main Proceedings for an order that the Plaintiff be dis-joined therefrom or an order of like effect.
3. An order that the Plaintiff be permitted to, as it sees fit: (1) instruct Hong Kong attorneys to act on its behalf on matters arising out of, and incidental to, the Main Proceedings; and (2) instruct and seek expert evidence from non-Hong Kong attorneys (including but not limited to Cayman Islands attorneys) on matters arising out of, and incidental to, the Main Proceedings.
4. An order that the Plaintiff be indemnified against all and any costs and expenses arising out of, and incidental to, the Main Proceedings out of the assets of the Trust, including for the avoidance of doubt, its own professional charges in accordance with its terms and conditions as amended from time to time for the time of its own employees spent in dealing with the conduct of the Main Proceedings.
5. An order that the Plaintiff be at liberty to realise and/or raise funds from, wherever possible, the assets of the Trust for the purpose of settling the costs and expenses incurred by the Plaintiff arising out of, and incidental to, the Main Proceedings, as the Plaintiff thinks fit.
6. An order that the Plaintiff be at liberty to make a request to Marina Star Limited for it to appoint two additional directors to the board of Easy Star Holdings Limited.
7. All further and necessary orders and directions as this Court shall think fit, including, if necessary, directions as to any necessary representation orders and service and/or notification of these proceedings.
8. That provision be made for the costs of this application.

9. That the parties be at liberty to apply for further or other relief.

Dated the 28 day of September 2015



APPLEBY (CAYMAN) LTD
Attorneys-at-law for the Plaintiff

TO: The Registrar of the Financial Services Division.

TIME ESTIMATE: The estimated length of the hearing of this summons is half a day.