

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD 172 OF 2016 (IMJ)

IN CHAMBERS AND IN PRIVATE

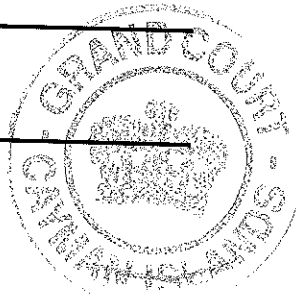
24 JANUARY 2017

BEFORE THE HON. JUSTICE MANGATAL

BETWEEN MERIDIAN TRUST COMPANY LIMITED
AND AMERICAN ASSOCIATED GROUP, LTD. APPLICANTS
AND BANCO BTG PACTUAL S.A. 6TH RESPONDENT

DISCLOSURE ORDER

PENAL NOTICE



IF YOU BANCO BTG PACTUAL S.A DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND YOUR DIRECTORS MAY ALSO BE LIABLE TO IMPRISONMENT OR TO BE FINED OR TO HAVE THEIR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE RESPONDENT TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

UPON the application of **MERIDIAN TRUST COMPANY LIMITED** and **AMERICAN ASSOCIATED GROUP, LTD.** ("the Applicants")

AND UPON the Applicants' application for disclosure from **BANCO BTG PACTUAL S.A**, the **Sixth Respondent**, dated 21 December 2016 ("the Application") and the Applicants' application for the continuation of interim injunctive relief dated 16 January 2017

AND UPON hearing counsel for the Applicants, the First to Fourth Respondents and the Sixth Respondent.

AND UPON reading the fourth affidavit of Mr Thomas de Araujo dated 21 December 2016, the Sixth Affidavit of Richard Trainer dated 20 January 2017 and the Seventh Affidavit of Richard Trainer dated 24 January 2016

AND UPON this Court ordering the Sixth Respondent to disclose documents on 22 December 2016 (the "First Disclosure Order")

AND UPON the Applicants, by their counsel, undertaking:

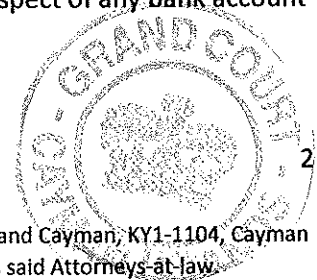
- (A) If the court later finds that this order or carrying it out has caused loss to the Sixth Respondent and decides that the Sixth Respondent should be compensated for that loss, the Applicants will comply with any order the court may make but any order for compensation will be limited to the amount of assets held by the First Applicant in its capacity as trustee of the Chrisly Trust.
- (B) The Applicants will not, without the permission of the court, use any documents or information obtained as a result of this order, except for the purposes of civil proceedings, for the same or related subject matter to these proceedings in Florida, United States and the Cayman Islands.

IT IS ORDERED THAT:

1. To the extent not already disclosed pursuant to the First Disclosure Order, the Sixth Respondent shall produce by 30 January 2017 copies of the following categories of documents (or copies of those documents) which the Respondent's Cayman Islands branch has within its power, possession or control, located within or accessible from the Islands in respect of any bank account identified as being responsive to the First Disclosure order:

00661184-1

THIS ORDER was **FILED** by **SOLOMON HARRIS** of 3rd Floor, First Caribbean House, P.O. Box 1990, Grand Cayman, KY1-1104, Cayman Islands, Attorneys-at-law for and on behalf of the Applicants whose address for service is that of its said Attorneys-at-law



- (i) Payment orders made since 23 December 2016 (which for the avoidance of doubt includes all requests for the transfer of funds from any account identified by the Sixth Respondent as responsive to the First Disclosure order);
- (ii) Communications regarding the Order made herein on 28 October 2016 (as amended) and/or the First Disclosure Order with the First to Fourth Respondents, or those representing the First to Fourth Respondents since 23 December 2016 and Documents evidencing such communications, save where such communications and/or documents are privileged.

“Document” means anything in which information of any description is recorded.

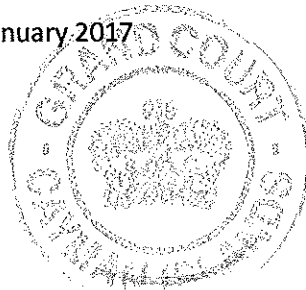
2. The Sixth Respondent shall produce copies of any documents created or received after the date of this order within the categories listed in paragraph 1 above no later than 2 business days after the creation or receipt of such documents.
3. The Sixth Respondent's costs, including its costs and expenses of complying with this order be paid by the Applicants on an indemnity basis, to be taxed if not agreed.
4. Liberty to apply

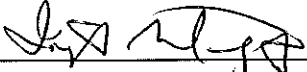
For the purposes of this order, the Applicants' attorneys are:

Solomon Harris (Attn: Laura Hatfield/Jamie McGee)
3rd Floor
First Caribbean House
P.O. Box 1990
Grand Cayman KY1-1104
Cayman Islands
Tel: +1345 949 0488

Dated this 24th day of January 2017

Filed this 27th day of January 2017





THE HONOURABLE MADAM JUSTICE MANGATAL
JUDGE OF THE GRAND COURT

APPROVED AS TO FORM AND CONTENT:

Solomon Harris
SOLOMON HARRIS

Attorneys for the Applicants

Ogier

OGIER

Attorneys for the 6th Respondent

