

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 048 OF 16

BETWEEN:

RICHARD KENNETH SPECHT Plaintiff

AND:

CARL MAYBIN II Defendant

WRIT OF SUMMONS

TO: **CARL MAYBIN II**, of, 300 Kuulei Road, Suite A, Kailua, Hawaii 96734,
United States of America.

THIS WRIT OF SUMMONS is 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 the Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495GT, 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 judgment may be entered against you forthwith without further notice.

Issued this 8 day of March 2016

NOTE - The Writ may not be served later than 4 calendar months beginning with the date of issue unless renewed by order of the Court.

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

GCR 1995 (Revised)

STATEMENT OF CLAIM

1. The Plaintiff in the present proceedings is a resident of the Cayman Islands, and is a Director and officer of a capital investment corporation registered as an Exempt Company.
2. The Plaintiff has in excessive of 17 years professional experience in the financial services industry, and the course of his professional career, has developed a strong reputation with a select clientele.
3. At all material times, the Plaintiff and the Defendant were Directors and Officers of Kashin Inc (“Kashin”), a corporation duly incorporated in the State of Nevada, United States of America.
4. The Plaintiff and Defendant were both appointed officers of Kashin on 3 December 2014.
5. Between 11 February 2016 and 25 February 2016, a dispute as to the corporate governance of Kashin developed between the Plaintiff on the one hand, and the Defendant and other members of the Board of Directors of Kashin on the other.
6. As a result of the dispute as to corporate governance, the Defendant caused to be filed with the United States Securities and Exchange Commission (“the SEC”) on 28 February 2016, a Form 8-K (“the First Form”), by which it was alleged, inter alia, that the Plaintiff:
 - a) Engaged in dishonest dealings with third parties in respect to corporate funds;
 - b) Failed to comply with regulations as to corporate governance regarding the issuance of shares;
 - c) Engaged in dishonest dealings with the Defendant’s electronic signature;
 - d) Improperly entered contractual relations with third party suppliers;

- e) Failed to comply with regulations as to corporate governance as to the sale of shares; and
 - f) Generally failed to take care of the interests of the shareholders of Kashin.
7. The Plaintiff denies each and every one of the allegations contained paragraph 6 above.
 8. On 28 February 2016, by a vote of approximately 66% of the shareholders, representing approximately 9 million of 12 million issued shares, the Defendant, Richard Dyer and Haden Kirkpatrick were all dismissed as members of the Board of Directors of Kashin, and removed from any other offices which they may have held.
 9. In addition, the vote of shareholders confirmed the Plaintiff's appointment as a Director and Treasurer, and appointed the Plaintiff as interim President, and Chief Executive Officer of Kashin.
 10. Following the vote referred to in paragraph 8 above, the Plaintiff caused to be filed with the SEC a further Form 8-K on 1 March 2016 ("the Second Form"), confirming the change in management of the corporation.
 11. The Second Form made no allegation of impropriety against any former Director or Officer of Kashin, save to confirm that a purported issuance of 6,000,000 shares to the Defendant was declared to be invalid.
 12. On or about 3 March 2016, the Defendant wrote emails, enclosing a copy of the First Form, and represented the truth of the content of the document to:
 - a) Mrs Rachel Specht, the spouse and Attorney of the Plaintiff; and
 - b) Mr Jim O'Neil, the Chief Executive Officer of Global Fidelity Bank (Cayman), with whom the Plaintiff has extensive professional dealings collectively, "the Publications").
 13. Each of the communications to the persons named in paragraph 12 above constitutes a publication for the purposes of these proceedings.
 14. By the communication, the Defendant purported to endorse and represent the truth of the allegations contained in the First Form.

15. The allegations contained in the First Form, as repeated by the Defendant in the Publications, constitute defamatory imputations, in that they allege dishonesty and impropriety, as particularised in paragraph 6 above.
16. The defamatory imputations set out in paragraph 6 above are such that they are capable of lowering the Plaintiff in the estimation of right-thinking members of the community.
17. By virtue of the communication of the Publications to residents of the Cayman Islands, the publication was made in the jurisdiction of this Honourable Court.
18. By reason of the Defendant's misconduct, the Plaintiff has suffered loss and damage, in that the Plaintiff's personal and professional reputation has suffered harm.
19. The Plaintiff is therefore entitled to damages for the defamatory publication, in an amount to be assessed by this Honourable Court.
20. Further, and in the alternative, the Defendant has made a publication which constitutes a malicious falsehood.
21. The Publications made by the Defendant are false, and entirely made without any factual basis.
22. The Publications were motivated by malice.

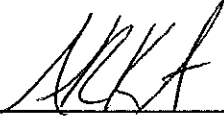
Particulars

The Defendant was motivated to make the Publications as a response to his removal from office as CEO and Director of Kashin.

23. The Publications are such that they are capable of causing financial loss to the Plaintiff by irreparably harming a professional relationship between the Plaintiff and his financial service provider, as well as harming his professional reputation within the financial services community.
24. In the premises, the Plaintiff is entitled to damages for malicious falsehood, in an amount to be assessed by this Honourable Court.

AND THE PLAINTIFF claims:

1. Damages for defamation.
2. Damages for malicious falsehood.
3. Costs.



ARKA Legal Services
Attorney for the Plaintiff

THIS WRIT was issued by ARKA Legal Services, Attorneys for the Plaintiff whose address for service is PO Box 950, 67 Fort Street, George Town, Grand Cayman.

GCR 1995 (Revised)

Acknowledgement of service of writ of summons (0.12, r.3)

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS**

1. The accompanying form of Acknowledgment 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, P.O. Box 495 GT, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a Defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his Defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Please complete overleaf

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. 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.
3. 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 Writ of Summons)".
4. 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.
5. 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.
6. 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.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

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CAUSE NO OF

BETWEEN:

RICHARD KENNETH SPECHT Plaintiff

AND:

CARL MAYBIN II Defendant

ACKNOWLEDGMENT OF SERVICE
OF WRIT OF 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

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

yes

no

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

yes

no

Service of the Writ is acknowledged accordingly

(Signed).....

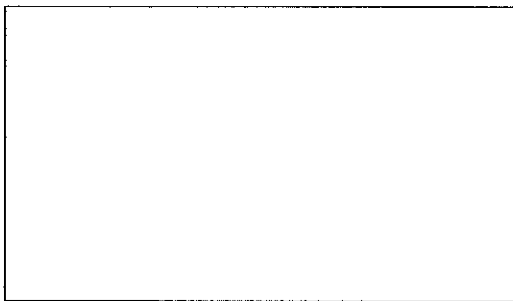
Attorney for

Please complete overleaf

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.

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



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

