

IN THE GRAND COURT OF THE CAYMAN ISLANDS

581
CAUSE NO. OF 1997

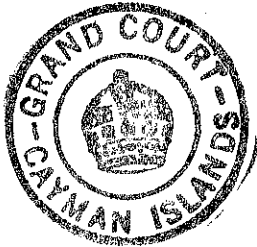
BETWEEN: (1) MARK ANDRE
(2) DANIEL THOMSON
(3) JOHN DIFRANCES
(4) CLEFT OF THE ROCK FOUNDATION
(5) MA FUND

PLAINTIFFS

AND

(1) PETER DALE
(2) EARNSCLIFFE LIMITED

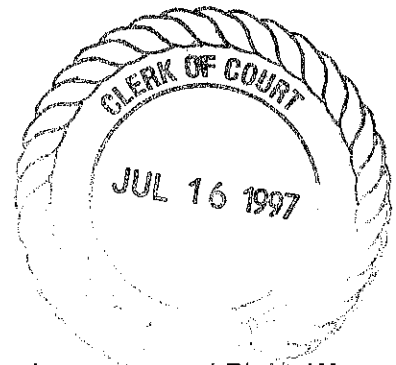
DEFENDANTS



WRIT OF SUMMONS

TO: Peter Dale
of 22 North Street, Dartmouth
Nova Scotia, Canada

AND TO: Earnscliffe Limited
P.O. Box 258 GT
Grand Cayman



THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs 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 495G, 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 16th day of July 1997

NOTE - This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 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.

AND THE PLAINTIFFS' claim is for:

1. Damages for conspiracy to defraud.
2. An order appointing Christopher D. Johnson and John M. Dinan of Coopers & Lybrand, P.O. Box 219, George Town, Grand Cayman as Official Receivers and Managers of the property of the Defendants.
3. Further or other relief.
4. Interest on such any damages as may be awarded pursuant to paragraph 1 above.
5. Costs

Hunter & Hunter

Hunter & Hunter
Attorneys for the Plaintiff



THIS WRIT was issued by Hunter & Hunter, the Attorneys for the Plaintiff whose address for service is P.O. Box 190G, The Huntlaw Building, George Town, Grand Cayman (Ref:AB/k125I/1/writ)