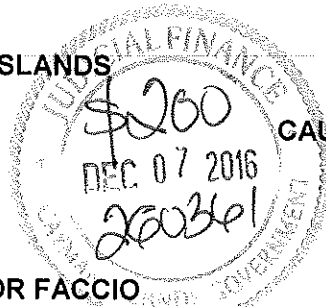


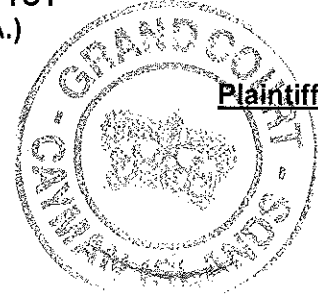
IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION



CAUSE NO. G0235 OF 2016

BETWEEN:

VALDOR FACCIO
(IN HIS CAPACITY AS TRUSTEE IN BANKRUPTCY
OF THE ESTATE OF BANCO PONTUAL S.A.)



Plaintiff

- AND:
- (1) ROYAL BANK OF CANADA TRUST COMPANY (CAYMAN) LIMITED
 - (2) MAPLES AND CALDER LIMITED

Defendants



EX PARTE ORIGINATING SUMMONS

LET ALL PARTIES CONCERNED attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the 16th day of March 2017, at 9:30 AM o'clock on the hearing of an application by the Plaintiff of Largo São Bento, 64 Sala 132 – Centro, São Paulo 01029-010, Brazil for Orders that:

- (1) the First Defendant give disclosure pursuant to the principle established in *Norwich Pharmacal Co v. Customs and Excise Commissioners* [1974] AC 133 of:
 - (a) the following documents held by the First Defendant in respect of Long Shore Investment Limited ("Long Shore"):
 - (i) all account opening documents, including documents showing the names and addresses of the shareholders and/or beneficial owners of Long Shore, and the names and addresses of the directors and officers of Long Shore;
 - (ii) all correspondence between the First Defendant and Long Shore, its shareholders, beneficial owners, directors and officers;

- (iii) all documents relating to the payment of invoices for services provided by the First Defendant to Long Shore and details of all payments made by or on behalf of Long Shore to the First Defendant; and
 - (iv) all banking records relating to the account(s) held by Long Shore with the First Defendant, including bank statements showing all payments received from The First Newland Bank Limited ("**First Newland**") and the onwards transmission of such payments;
- (b) the following documents held by the First Defendant in respect of Short Shore Investment Limited ("**Short Shore**"):
 - (i) all account opening documents, including documents showing the names and addresses of the shareholders and/or beneficial owners of Short Shore, and the names and addresses of the directors and officers of Short Shore;
 - (ii) all correspondence between the First Defendant and Short Shore, its shareholders, beneficial owners, directors and officers;
 - (iii) all documents relating to the payment of invoices for services provided by the First Defendant to Short Shore and details of all payments made by or on behalf of Short Shore to the First Defendant; and
 - (iv) all banking records relating to the account(s) held by Short Shore with the First Defendant, including bank statements showing all payments received from First Newland and the onwards transmission of such payments;
- (2) the Second Defendant give disclosure pursuant to the principle established in *Norwich Pharmacal Co v. Customs and Excise Commissioners* [1974] AC 133 of the following documents held by the Second Defendant in respect of Summit Inc. ("**Summit**"):
 - (i) all documents showing the names and addresses of the shareholders and/or beneficial owners of Summit, and the names and addresses of the directors and officers of Summit;

- (ii) all correspondence between the Second Defendant and Summit, its shareholders, beneficial owners, directors and officers;
 - (iii) all documents relating to the payment of invoices for services provided by the Second Defendant to Summit and details of all payments made by or on behalf of Summit to the Second Defendant; and
 - (iv) all documents relating to any bank accounts held by Summit, including any bank statements showing payments received from First Newland and the onwads transmission of such payments;
- (3) all information relating to this Originating Summons (save only as to such disclosure as may be required by law) is to be kept confidential (but without prejudice to the right of any party to apply for the same or any part thereof to be made public);
- (4) the Defendants shall not inform anyone else of these proceedings or that they are to disclose the documents sought; and
- (5) such further or other relief be granted as the Court deems appropriate.

Dated the 7th day of December 2016



Ogier
Attorneys for the Plaintiff

TIME ESTIMATE: The estimated length of the hearing of this Summons is 2 hours