

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

**CAUSE NO: FSD 16 OF 2017  
(ORIGINALLY CAUSE NO: GC 251/2016)**

BETWEEN: 1) CHINA MEDICAL TECHNOLOGIES, INC.  
(IN OFFICIAL LIQUIDATORS)  
2) CMED TECHNOLOGIES LTD.  
3) KENNETH KRYS AND COSMO BORRELLI IN  
THEIR CAPACITY AS THE JOINT OFFICIAL  
LIQUIDATORS OF CHINA MEDICAL TECHNOLOGIES,  
INC. (IN OFFICIAL LIQUIDATION)

PLAINTIFF'S

AND: WU XIAODOING  
AND THE 23 OTHER PERSONS LISTED AS THE  
2<sup>ND</sup> TO 24<sup>TH</sup> DEFENDANTS IN THE SCHEDULE HEARTO

DEFENDANT

**ORDER FOR TRANSFER TO FINANCIAL SERVICES DIVISION**

UPON reading the written application of Campbells dated 25 Jan, 2017

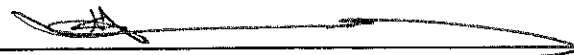
AND UPON being satisfied that the proceeding is a financial services proceeding

IT IS ORDERED by the Registrar that –

1. the proceeding is hereby transferred to the Financial Services Division under Cause No. FSD 0016 of 2017;
2. the proceeding is assigned to Mr Justice McMillian (RMJ);
3. a transfer fee of (CI4, 450.00 be paid by Campbells; and
4. no further step may be taken in the proceeding unless and until the transfer fee has been paid in full.

DATED this 30<sup>th</sup> day of Jan, 2017

FILED this 30<sup>th</sup> day of Jan, 2017

  
**Registrar of the Financial Services Division**



This Order was filed by the Registrar of the Financial Services Division of the Grand Court, the Law Courts, George Town, Grand Cayman.

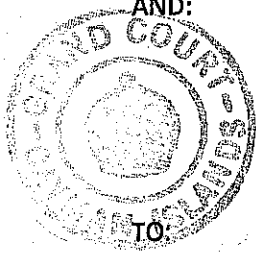
IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 6251 OF 2016

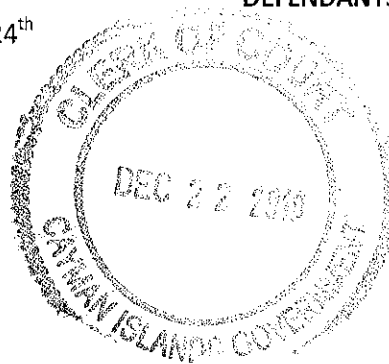
**BETWEEN:** CHINA MEDICAL TECHNOLOGIES, INC. FIRST PLAINTIFF  
(IN OFFICIAL LIQUIDATION)  
CMED TECHNOLOGIES LTD SECOND PLAINTIFF  
KENNETH KRYS AND COSIMO BORRELLI IN THEIR THIRD PLAINTIFFS  
CAPACITY AS THE JOINT OFFICIAL LIQUIDATORS OF  
CHINA MEDICAL TECHNOLOGIES, INC. (IN OFFICIAL  
LIQUIDATION)

**AND:** WU XIAODONG DEFENDANTS  
and the 23 other persons listed as the 2<sup>nd</sup> to 24<sup>th</sup>  
Defendants in the Schedule hereto

WRIT OF SUMMONS



**TO:** WU XIAODONG  
**Of:** No. 301, Unit 1, 2/F,  
68 Xinzhong Street, Dongchen District  
Beijing 100027, PRC



**And of:** 17 Coral Island,  
Singapore 098564

**AND TO THE 2<sup>nd</sup> TO 24<sup>th</sup> DEFENDANTS**, whose addresses are set out in the Schedule hereto.

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 28 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 KY1-1106, Cayman Islands, 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: 22 December 2016

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.

**Schedule - Defendants**

<b>Defendant no.</b>	<b>Name</b>	<b>Address</b>
1.	Wu Xiaodong	No. 301, Unit 1, 2/F, 68 Xinzhong Street, Dongchen District, Beijing, PRC and 17 Coral Island, Singapore 098564
2.	Samson Tsang Tak Yung	Flat D, 15/F, Tower 6, Uptown, 600 Castle Peak Road, Hung Shui Kiu, Yuen Long, New Territories, Hong Kong
3.	Chen Zhong	9241 South New Horizon Drive, Sandy, UT84093, United States of America; 1020 Quarry View Way, Sandy UT 84094, United States of America; and Room 3A09, 4/F, Building 6, No. 66 Xiaguangli, (Tower E, Ocean Express Apartment), Chaoyang District, Beijing 100027, PRC
4.	Zhu Feng (Charles)	No. 101, Gate 3, 21/F, 19 Xisanhuan North Road, Haidian District, Beijing, PRC and Room 902, Tower 21, Season's Park, 36B Dongzhimenwai Street, Dongcheng District, Beijing 100027, PRC
5.	Chong Wing Hip (in his personal capacity and formerly trading as Kam Hing Trading Co)	Flat 2, 5th Floor, Block B, Cheong Ming Building, 15-23 Tzat Tsz Mui Road, North Point, Hong Kong
6.	Hao Xiaoqing Allan	Flat A, 3/F, Tower 3, Villa Cecil Phase II, 192 Victoria Road, Pokfulam, Hong Kong
7.	Supreme Well Investments Limited	CCS Management Limited, 216 Main Street, Road Town, Tortola, Virgin Islands, British
8.	East Hope International Limited	Commonwealth Trust Limited, P.O. Box 3321, Road Town, Tortola, British Virgin Islands
9.	Cheer Link International Limited	Room 1003, 10/F, Boss Commercial Centre, No. 28 Ferry Street, Kowloon, Hong Kong
10.	Innovative Technology Investment Limited	Commonwealth Trust Limited, P.O. Box 3321, Road Town, Tortola, British Virgin Islands
11.	Dynamic Sense Limited	CCS Management Limited, 216 Main Street, Road Town, Tortola, Virgin Islands, British
12.	Time Region Holdings Limited	Offshore Incorporations Limited, P.O. Box 957, Road Town, Tortola, B.V.I.

Defendant no.	Name	Address
13.	Bi Xiaojiong [(in her personal capacity and as trustee of The Xiao Qiong Bi Irrevocable Trust and The Alisa Wu Irrevocable Trust)	17 Coral Island, Singapore 098564 and 16 Fairway Point, Newport Coast, CA 92657, USA
14.	Worldpro Investments Limited	1st Floor, Yamraj Bg, P.O. Box 3321, Road Town, Tortola, Virgin Islands, British
15.	Long Chart Investments Limited	Commonwealth Trust Limited, P.O. Box 3321, Road Town, Tortola, British Virgin Islands
16.	Chavis Investments Limited	1st Floor, Yamraj Bg, P.O. Box 3321, Road Town, Tortola, Virgin Islands, British
17.	Sinowell International Investment Limited	Commonwealth Trust Limited, P.O. Box 3321, Road Town, British Virgin Islands
18.	Chengxuan International Ltd.	Walkers (BVI) Limited, P.O. Box 92, Mill Mall, Road Town, Tortola, B.V.I.
19.	Weixiao Medical Technology Limited	Commonwealth Trust Limited, P.O. Box 3321, Road Town, Tortola, British Virgin Islands
20.	Trinity Link Enterprises (H.K.) Company Limited	Room 1009, 10/F., China United Centre, 28 Marble Road, North Point, Hong Kong
21.	WB International Holding Pte. Ltd.	2 Balestier Road, #04-697, Balestier Hill Shopping Centre, Singapore 320002
22.	Max Prosper Enterprises Limited	Suites 3701-3710, 37/F., Jardine House, 1 Connaught Place, Central, Hong Kong
23.	Jun Yun Bi	16 Fairway Point Newport Coast, CA 92657
24.	Iain Ferguson Bruce	Apt. F, 7 Peel Rise, The Peak, Hong Kong

## GENERAL INDORSEMENT

The Plaintiffs claim against the Defendants for equitable compensation and/or losses and damages and/or restitution and/or rescission and/or conversion and/or declaratory relief (including but not limited to declaratory relief under section 147 of the Companies Law (2016 Revision)) and/or all inquiries, account of profits and injunctions and/or tracing and interest including compound interest and costs and all further or other relief and remedies as the Court may see fit in respect of, relating to, in connection with or arising out of (but not limited to) any and/or all of the payments made in the period in or about November 2006 to December 2009 by the First Plaintiff, the Second Plaintiff or any of their subsidiaries or at the direction of the First and/or Second Plaintiffs or any of their officers to Supreme Well Investments Limited or any of its subsidiaries or to entities, persons or bank accounts nominated by Supreme Well Investments Limited or any of its officers or purported officers, all subsequent transfers of all such sums in full or part thereof and all acts or omissions or other dealings thereof, in connection therewith, arising out of or relating thereto, all such payment or payments, transfer or transfers and acts or omissions or dealings having been made without authority and/or in breach of fiduciary, equitable, statutory, regulatory or other duties and/or in breach of trust and/or as fraud and/or equitable fraud and/or unconscionability and/or conspiracy and/or money had and received and/or unjust enrichment and/or misrepresentation and/or in breach of contract and/or negligence including gross negligence and/or recklessness and/or wilful misconduct and/or default and/or as constructive trustees and/or for knowing or unconscionable receipt and/or knowing or dishonest assistance as accessories.

To the extent that any potential limitation periods relating to the claims set out herein would otherwise have expired, the Plaintiffs intend to rely on provisions of the Limitation Law (1996 Revision) either directly or by analogy to extend and/or postpone the commencement of the relevant limitation period.

THIS WRIT is issued solely for the purpose of preserving the claims identified above in light of the pending expiry of a possible limitation period. For the avoidance of doubt, the Plaintiffs have made no decision as to whether or not they will pursue the claims. Any decision as to whether or not the Plaintiffs will pursue these claims is subject to further and on-going investigations by the Joint Official Liquidators appointed by the Grand Court of the Cayman

Islands and the Liquidators appointed by the High Court of Hong Kong and the outcome of those investigations.

Dated: 22 December 2016



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**CAMPBELLS**

**Attorneys at Law for the Plaintiffs**

**BETWEEN:** CHINA MEDICAL TECHNOLOGIES, INC. FIRST PLAINTIFF  
 (IN OFFICIAL LIQUIDATION)  
 CMED TECHNOLOGIES LTD SECOND PLAINTIFF  
 KENNETH KRYS AND COSIMO BORRELLI IN THEIR THIRD PLAINTIFFS  
 CAPACITY AS THE JOINT OFFICIAL LIQUIDATORS OF  
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 LIQUIDATION)

**AND:** WU XIAODONG DEFENDANTS  
 and the 23 other persons listed as the 2<sup>nd</sup> to 24<sup>th</sup>  
 Defendants in the Schedule hereto

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**ACKNOWLEDGMENT OF SERVICE  
 OF WRIT OF SUMMONS**

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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.

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

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2. State whether the Defendant intends to contest the proceedings (tick appropriate box)  
 yes  no

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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

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Service of the Writ is acknowledged accordingly

(Signed) \_\_\_\_\_  
 Attorney for

Please complete overleaf

**NOTES ON ADDRESS FOR SERVICE**

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.

**Campbells  
4<sup>th</sup> Floor Willow House  
PO Box 884  
George Town  
Grand Cayman KY1-9010  
(Ref: JGM/DMP/14035-19796)**

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

[Empty box for defendant's attorney indorsement]

**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 495G, 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**

## 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 FUND the form must be completed by an Attorney or by someone authorised to act on behalf of the Fund, but the Fund can take no further step in the proceedings without an Attorney acting on his 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.