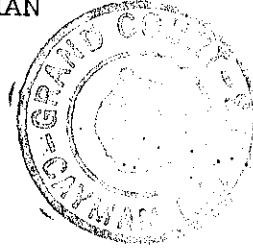


IN THE GRAND COURT OF THE CAYMAN ISLANDS

HOLDEN AT GEORGE TOWN, GRAND CAYMAN

CAUSE NO. 236 OF 1995



IN THE MATTER the matter of the trusts of a Settlement dated 6th July 1984 and made between Henry Alexander McKinnell as Settlor and the Swiss Bank & Trust Corporation Limited of Grand Cayman as trustee (known as the Seven Oaks Heritage Trust)

AND IN THE MATTER of the Trusts Law (Revised)

BETWEEN: THE SWISS BANK & TRUST CORPORATION LIMITED PLAINTIFF

AND: (1) HENRY ALEXANDER MCKINNEL
(2) THOMAS JOHN MONSEN
(3) THOMAS S. BARTON
(4) AALL TRUST & BANKING CORPORATION LIMITED
(5) ALISON MCKINNEL DEFENDANTS

ORIGINATING SUMMONS

TO: (1) HENRY ALEXANDER MCKINNEL c/o Truman Bodden & Co.,
George Town, Grand Cayman
(2) THOMAS JOHN MONSEN of Flat 5, 21 De Vere Garden,
London, England
(3) THOMAS S. BARTON c/o Myers & Alberga, George Town,
Grand Cayman and of 99 Bank Street, Suite 709,
Ottawa, Canada
(4) AALL TRUST & BANKING CORPORATION LIMITED of George
Town, Grand Cayman
(5) ALISON MCKINNEL c/o Truman Bodden & Co of George
Town, Grand Cayman and of 45 Morningside Drive,
Greenwich, Connecticut, U.S.A.

LET THE DEFENDANTS within 14 days after service of this Summons on them, counting the day of service, (or within time stated in the Order of this Court permitting service outwith the jurisdiction in respect of those Defendants residing overseas) return the accompanying Acknowledgement of Service to the Courts Office, P.O. Box 495, George Town, Grand Cayman.


By this Summons which is issued on the application of the Plaintiff **THE SWISS BANK & TRUST CORPORATION LIMITED** of P.O. Box 852, Grand Cayman, Cayman Islands the Plaintiff seeks the following relief pursuant to Section 45 of the Trusts Law (Revised) namely:-

1. Directions whether the Defendant Thomas S. Barton has been validly appointed the Protector of the above-mentioned Settlement in place of the Defendant Thomas John Monsen by virtue of a Deed of Appointment made by the Defendant Thomas John Monsen and dated 21st March 1995.
2. Directions whether the Plaintiff has been validly removed as the trustee of the said Settlement by a notice in writing signed by the Defendant Thomas S. Barton and dated 2nd May 1995.
3. Directions whether the Defendant Aall Trust & Banking Corporation Limited has been validly appointed as the trustee of the said Settlement by a notice in writing signed by the Defendant Thomas S. Barton and dated 2nd May 1995.
4. Directions whether the Plaintiff can properly deliver all assets of the said Settlement to the Defendant Aall Trust & Banking Corporation Ltd.
5. That all further and necessary directions may be given.



6. That provision may be made for the costs of this application.

DATED this 2nd day of June 1995.


RITCH & CONOLLY

If the Defendant does not acknowledge service, such Judgment may be given or order made against or in relation to ham as the Court may think just and expedient.

NOTE: This Summons 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 that date unless renewed by Order of the Court.

IMPORTANT

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

THIS ORIGINATING SUMMONS was issued by Messrs. Ritch & Conolly whose address for service is P.O. Box 1994, 3rd Floor Royal Bank Building, George Town, Grand Cayman, B.W.I.

