

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD ²⁰³ OF 2019 ()

IN THE MATTER OF AN EQUITABLE SHARE MORTGAGE DATED 3 DECEMBER 2014

BETWEEN:

G3 EXPLORATION LIMITED (FORMERLY GREEN DRAGON GAS LTD)

AND:



- (1) NORDIC TRUSTEE AS
(2) COSIMO BORRELLI
(3) MITCHELL MANSFIELD

PLAINTIFF

DEFENDANTS

ORIGINATING SUMMONS

- TO: (1) Nordic Trustee AS, Kronprinsesse Märthas plass 1, N-0161, Oslo, Norway
(2) Cosimo Borrelli, Borrelli Walsh Limited, Level 17, Tower 1, Admiralty Centre, 18 Harcourt Road, Hong Kong
(3) Mitchell Mansfield, Borrelli Walsh (Cayman) Limited, 3rd Floor, Strathvale House, 90 North Church Street, Grand Cayman, KY1-1204, Cayman Islands

LET THE DEFENDANTS, within 14 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts office, PO Box 495G, George Town, Grand Cayman.

By this Originating Summons, which is issued on the application of G3 Exploration Limited (the "Plaintiff") of International Corporation Services, Harbour Place, 2nd Floor, 103 South Church Street, George Town, Grand Cayman, KY1-1106, Cayman Islands, the Plaintiff seeks the determination of the Court on the following questions, namely:

1. The validity of the appointment of the Second and Third Defendants as joint and several receivers of Greka Gas China Ltd (the "Company") pursuant to clause 8 of the equitable share mortgage dated 3 December 2014 between the First Defendant and the Plaintiff.

This Originating Summons was issued by Ogier, Attorneys-at-Law for the Plaintiff, whose address for service is: 89 Nexus Way, Camana Bay, Grand Cayman KY1-9009, Cayman Islands (MKS/GEL/426935.0001)

2. Consequent upon the determination of question (1) above, the validity of the appointment of the Second and Third Defendants pursuant to a written resolution dated 9 September 2019 purporting, inter alia, to remove all existing directors of the Company and appoint Cosimo Borrelli and Mitchell Mansfield as directors of the Company with immediate effect.
3. Costs.

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

Dated this 14th day of October 2019.



Ogier
Attorneys for the Plaintiff

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 Acknowledgment of Service are given with the accompanying form.

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF ORIGINATING SUMMONS**

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.

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 If you wish to defend claims made in the originating summons, or intend to attend the proceedings and to participate in them so far as necessary (although not necessarily in an adversarial manner) you should tick the "Yes" box in paragraph 2 of the acknowledgment of service.
- 3 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.
- 4 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 Originating Summons)".
- 5 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.
- 6 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.
- 7 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.
- 8 Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
- 9 A Defendant acting in person may obtain help in completing the form at the Courts Office.

This Originating Summons was issued by Ogier, Attorneys-at-Law for the Plaintiff, whose address for service is:
89 Nexus Way, Camana Bay, Grand Cayman KY1-9009, Cayman Islands (MKS/GEL/426935.0001)

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PLAINTIFF

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(1) NORDIC TRUSTEE AS

(2) COSIMO BORRELLI

(3) MITCHELL MANSFIELD

DEFENDANTS

**ACKNOWLEDGMENT OF SERVICE OF
ORIGINATING 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

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

2. State whether the Defendant intends to contest or otherwise participate in the proceedings (tick appropriate box)

yes

no

Service of the Originating Summons is acknowledged accordingly

This Originating Summons was issued by Ogier, Attorneys-at-Law for the Plaintiff, whose address for service is:
89 Nexus Way, Camana Bay, Grand Cayman KY1-9009, Cayman Islands (MKS/GEL/426935.0001)

(Signed).....

[Attorney] for

[Defendant in person]

Address for service:

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 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.

Ogier
89 Nexus Way
Camana Bay
Grand Cayman KY1-9009
Cayman Islands
Ref: MKS/GEL/426935.00001

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