

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 845 OF 1997

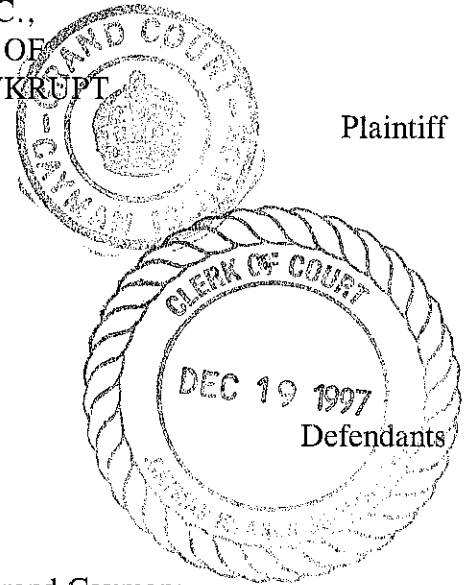
BETWEEN:

DELOITTE & TOUCHE, INC.,
TRUSTEE OF THE ESTATE OF
BRE-X MINERALS LTD., A BANKRUPT

Plaintiff

AND:

- (1) JOHN B. FELDERHOF,
- (2) INGRID FELDERHOF,
- (3) SPARTACUS CORP.



WRIT OF SUMMONS

TO: (1) John B. Felderhof of Vista Del Mar, West Bay, Grand Cayman;
(2) Ingrid Felderhof of Vista Del Mar, West Bay, Grand Cayman; and
(3) Spartacus Corp., a company incorporated in the Cayman Islands (Registration Number 68739) whose registered office is at the offices of Corporate Filing Services Ltd., P.O. Box 61GT, Harbour Centre, George Town, Grand Cayman.

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff 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 Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this 19th day of December, 1997.

NOTE - This Writ may not be served later than 4 calendar months beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

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

AND THE PLAINTIFF CLAIMS:

AGAINST THE FIRST DEFENDANT:

1. Damages caused by the First Defendant's breach of fiduciary duty and negligence in his capacity as a director, general manager and chief administrative officer of Bre-X Minerals Ltd. during the period from 1993 to 1997.

AGAINST THE SECOND, THIRD AND FOURTH DEFENDANTS:

2. A declaration that the Plaintiff is entitled to enforce any judgement obtained against the First Defendant against:
 - a. The shares in Spartacus Corp., the Third Defendant;
 - b. The sums standing to the credit of Spartacus Corp. in accounts with Barclays Bank plc;
 - c. All the property comprised in West Bay Beach North Registration Section, Block 10A, Parcel 263 on the grounds that the Second Defendant holds the legal title to the said property as nominee or bare trustee for the First Defendant absolutely or, alternatively, the Second Defendant's beneficial interest in the said property is liable to be set aside on grounds that it was transferred to her and/or acquired with money transferred to her either for no consideration or at an undervalue and with the intention to defraud the First Defendant's creditors.

AGAINST ALL THE DEFENDANTS:

3. An order that the Defendants disclose to the Plaintiff full particulars of all the property transferred by the First Defendant to the Second and Third Defendants and full particulars of all the property acquired by or on behalf of the Second and Third Defendants with money received (directly or indirectly) from the First Defendant since 1st January, 1993.
4. Such further or other relief as the Court thinks fit.
5. An order for costs.

DATED this 19th day of December, 1997.

Maples & Calder

MAPLES and CALDER

This Writ was issued by Maples and Calder, attorneys for the Plaintiff, whose address for service is Uglan House, PO Box 309GT, Grand Cayman, Cayman Islands.