

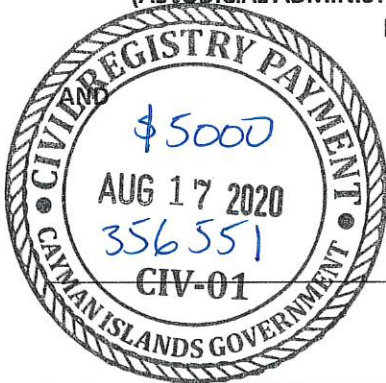
IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION

CAUSE NO FSD 183 OF 2020 [ ]

BETWEEN

CARLOS MAGNO, NERY E MEDEIROS SOCIEDADE DE ADVOGADOS  
(AS JUDICIAL ADMINISTRATOR OF THE INSOLVENT ESTATES OF SAM INDÚSTRIAS SA, BOULDER  
PARTICIPAÇÕES LTDA & MR DANIEL BIRMANN)

PLAINTIFF



BT GLOBAL INVESTMENTS



DEFENDANT

ORIGINATING SUMMONS

TO: BT Global Investments of One Capital Place, Shedden Road, Grand Cayman, Cayman Islands, PO BOX 847

LET THE DEFENDANT, within 14 days after service of this Originating Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, P.O Box 495G, George Town, Grand Cayman.

By this Summons, which is issued on the application of the Plaintiff, Carlos Magno, Nery e Medeiros Sociedade de Advogados (as Judicial Administrator of the Insolvent Estates of SAM Indústria SA, Boulder Participações Ltda & Mr Daniel Birmann (collectively, the "Birmann Estate")) for the following orders:

- 1 A declaration that the Birmann Estate, represented by the Plaintiff, is the lawful owner and/or has an equitable proprietary interest in the following shares or interests in the following entities:
  - 1.1 CBC Ammo LLC (formerly Brookmont Trading Corporation and Brookmont Trading LLC)
  - 1.2 South America Logistics LLC;
  - 1.3 Anaconda Group LLC;
  - 1.4 Charquinn LLC;
  - 1.5 Rayvera LLC;
  - 1.6 Rogerdale International LLC;
  - 1.7 BR Realty LLC;; and

1.8 CBC Europe SARL;

(together, the "Birmann Assets"):

- 2 A declaration that the Defendant holds such property and/or its traceable proceeds on trust for the Plaintiff, as judicial administrator of the Birmann Estate, which trust is governed by Cayman Islands law.
- 3 An order that the Defendant do execute such documents and deeds as shall be required to vest legal ownership of the Birmann Assets in the Plaintiff.
- 4 An account of profits, including but not limited to any and all dividends or distributions paid to the Defendant in respect of the Birmann Assets, and/or equitable compensation and all other necessary accounts and enquiries.
- 5 Costs.
- 6 Such further or other relief as the Court thinks appropriate, including as to any further or specific recognition of the Plaintiff in the Cayman Islands for the purposes of these or any related proceedings.

Dated the 14th day of August 2020

Campbells

Campbells

Attorneys for the Plaintiff

**NOTE:** This Originating Summons may be served no later than 4 calendar months (or if leave is required to effect service out of the jurisdictions, 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.

**Acknowledgement of service of originating summons (0.10, r.5)**

**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.

IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION

CAUSE NO FSD [] OF 2020 []

BETWEEN

**CARLOS MAGNO, NERY E MEDEIROS SOCIEDADE DE ADVOGADOS**  
(as Judicial Administrator of the Insolvent Estates of SAM Indústrias SA, Boulder Participações Ltda & Mr Daniel Birmann)

PLAINTIFF

AND

**BT GLOBAL INVESTMENTS**

DEFENDANT

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

(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.

Please complete overleaf

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  
FLOOR 4, WILLOW HOUSE  
GEORGE TOWN  
GRAND CAYMAN KY1-9010  
CAYMAN ISLANDS  
(REF: MGM/PDK/NP/18761-32961)**

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

