

IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION

CAUSE NO. OF 2020



GALINA TRUNINA & 114 OTHERS LISTED IN
SCHEDULE 1 TO THE WRIT OF SUMMONS

PLAINTIFFS

-and-

- (1) PETERS INTERNATIONAL (CAYMAN) LIMITED
(2) PETERS INTERNATIONAL INVESTMENT NV
(3) PROMSVYAZ CAPITAL BV
(4) DMITRI ANANYEV

DEFENDANTS

WRIT OF SUMMONS

TO: **PETERS INTERNATIONAL (CAYMAN) LIMITED** of c/o Maples Corporate Services Limited, P.O. Box 309GT, Uglan House, South Church Street, George Town, Grand Cayman, KYI-1104, Cayman Islands;

PETERS INTERNATIONAL INVESTMENT NV of Kaya Richard J. Beaujon Z/N, P.O. Box 837, Curaçao;

PROMSVYAZ CAPITAL BV of Amstelveenseweg 500, 1081KL Amsterdam, Netherlands; and

DMITRI ANANYEV of Vasileos Georgiou I, 48 Lemesos, Potamos Germasogeias, Cyprus.

THIS WRIT OF SUMMONS was **FILED** by **Bedell Cristin**, 18 Forum Lane, Suite 5305, Camana Bay, Grand Cayman, KY1-1104, Cayman Islands, Attorneys-at-law for and on behalf of the Plaintiffs whose address for service is that of his said Attorneys-at-law.

THIS WRIT OF SUMMONS has been issued against you by Ms Galina Trunina and the other Plaintiffs listed in Schedule 1 hereto of 18 Forum Lane, Suite 5305, Camana Bay, Grand Cayman, KY1-1104, Cayman Islands, in respect of the claims set out below.

Within 14 days of 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 495 GT, George Town, Grand Cayman, Cayman Islands, 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 of Service within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiffs may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this the 14th day of October 2020

NOTE – This Writ may not be served later than 4 calendar months beginning with that date unless renewed or permitted by order of the Court.

IMPORTANT

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

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ENDORSEMENT

CONCISE STATEMENT OF THE NATURE OF THE CLAIM

These proceedings concern a dishonest scheme, conceived by and/or implemented at the direction of the Fourth Defendant:

1. to use the First Defendant (which was ultimately owned and controlled by the Fourth Defendant and his brother, Alexei Ananyev) to procure the transfer of the Plaintiffs' funds, principally held securely on deposit in accounts at Promsvyazbank PJSC, into certain investment notes (the **Notes**) which were issued by the First Defendant and guaranteed by the Second and Third Defendants (which were both also ultimately owned and controlled by the Fourth Defendant and Alexei Ananyev);
2. to fraudulently transfer and/or apply and/or dissipate the proceeds of the Notes to or for the benefit of entities ultimately owned and/or controlled by, or otherwise associated with, the Fourth Defendant; and
3. as a result, to retain the proceeds of the Notes for such aforesaid entities and/or the Fourth Defendant himself and to procure that the First, Second and Third Defendants failed to fulfil their obligations in respect of the Notes such that the Plaintiffs lost the entirety of their investments.

The claims advanced in these proceedings arise under causes of action governed by Russian law because Russia was the country in which the relevant damage to the Plaintiffs occurred. Specifically, the Claimants' claims are advanced against the Defendants under Articles 10, 1064 and 1080 of the Russian Civil Code.

AND THE PLAINTIFFS claim:

1. Damages to be assessed pursuant to Article 10 and/or 1064 and/or 1080 of the Russian Civil Code;
2. Compound interest pursuant to the Court's equitable jurisdiction at such a rate and for such a period as the Court thinks fit, or alternatively, interest pursuant to Article 395 of the Russian Civil Code or alternatively, simple interest until judgment or earlier payment at the rate of 2^{3/80}% per annum or interest pursuant to Russian law or at such other rate then prevailing and/or

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determined by the Court in accordance with s.34 of the Judicature Law (2017 Revision) and the Judgment Debts (Rates of Interest) Rules 2012 as amended from time to time, or at such other rate and for such period as the court may think fit, such interest to be assessed;

3. Further or other relief; and
4. Costs.

DATED this the 14th day of October 2020



BEDELL CRISTIN
PLAINTIFFS' ATTORNEY-AT-LAW

THIS WRIT OF SUMMONS was **FILED** by **Bedell Cristin**, 18 Forum Lane, Suite 5305, Camana Bay, Grand Cayman, KY1-1104, Cayman Islands, Attorneys-at-law for and on behalf of the Plaintiffs whose address for service is that of his said Attorneys-at-law.

**DIRECTIONS FOR ACKNOWLEDGEMENT
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.
2. After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman, Cayman Islands.
3. 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).
4. 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.
5. 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.
6. If the Defendant fails to serve his Defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.
7. 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.
Please complete overleaf.**

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Notes for Guidance

1. Each Defendant is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 28 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 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.
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.

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**GALINA TRUNINA & 114 OTHERS LISTED IN
SCHEDULE 1 TO THE WRIT OF SUMMONS**

PLAINTIFFS

-and-

(5) PETERS INTERNATIONAL (CAYMAN) LIMITED

(6) PETERS INTERNATIONAL INVESTMENT NV

(7) PROMSVYAZ CAPITAL BV

(8) DMITRI ANANYEV

DEFENDANTS

ACKNOWLEDGMENT OF SERVICE OF WRIT OF 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.

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

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

(2) State whether the Defendant intends to contest the proceedings (tick appropriate box)

YES NO

(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

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.

Bedell Cristin,
18 Forum Lane, Suite 5305,
Camana Bay,
Grand Cayman, KY1-1104,
Cayman Islands

Ref:136770.0001/JMC/KMC

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

Schedule 1

List of Plaintiffs

#	First name	Surname
1.	Vyacheslav	Alabushev
2.	Larisa	Alexandrova
3.	Irina	Alkhimenkova
4.	Irek	Allaiarov
5.	Khakim	Aminov
6.	Vladimir	Anisimov
7.	Svetlana	Avakumova
8.	Tigran	Ayazyan
9.	Alexander	Babintsev
10.	Marat	Bagamanov
11.	Alexander	Balyakin
12.	Nikolay	Baranov
13.	Andrey	Bashilov
14.	Grigoriy	Baskin
15.	Rimma	Bikmukhamedova
16.	Vyacheslav	Blatov
17.	Oleg	Chastukhin
18.	Valentina	Chastukhina
19.	Sergey	Chernik
20.	Maksim	Chernyak
21.	Anatoliy	Chilikin
22.	Olga	Conradi
23.	Arkadiy	Datskovskiy
24.	Alexander	Derevyagin
25.	Vladimir	Dmitrenko
26.	Konstantin	Dolganov
27.	Svetlana	Dolgopolova
28.	Roman	Doronin
29.	Eduard	Drubetskiy
30.	Asya	Dudka
31.	Vil	Fakhretdinov
32.	Gulnara	Fakhretdinova
33.	Ekaterina	Felzinger
34.	Sergey	Gabrelyan
35.	Andrey	Galeev
36.	Andrey	Glyzin
37.	Ekaterina	Gomyrova
38.	Yuriy	Gudkov
39.	Lidia	Ivanova
40.	Natalia	Izofatova

#	First name	Surname
41.	Nikolay	Kalinin
42.	Sergey	Kapitonov
43.	Grenik	Khachaturyan
44.	Gulnara	Khamaeva
45.	Vyacheslav	Khananov
46.	Vladimir	Khotulev
47.	Tatiana	Kolchina
48.	Galina	Korolkova
49.	Vadim	Korshunov
50.	Inna	Krinochkina
51.	Tatiana	Krylova
52.	Andrey	Kukol
53.	Igor	Leontiev
54.	Ivan	Leontiev
55.	Sergey	Levichev
56.	Vitaliy	Litvishkin
57.	Yuriy	Lukianov
58.	Valeriya	Makarova
59.	Igor	Makovskii
60.	Valeriy	Mansurov
61.	Alexander	Margolin
62.	Sergey	Medvedev
63.	Vladimir	Melnikov
64.	Mikhail	Merkushev
65.	Ramil	Minnikhanov
66.	Valentina	Morozova
67.	Vil	Mukhametshin
68.	Evgeniy	Myakunov
69.	Dmitry	Nikulin
70.	Tamara	Novikova
71.	Ksenia	Novorodskaya
72.	Tatiana	Ostapenko
73.	Viacheslav	Ostashevskii
74.	Sergey	Ovchinnikov
75.	Natalia	Ovdina
76.	Leonid	Pak
77.	Natalia	Pavlenko
78.	Aleksey	Pavlinchuk
79.	Sergey	Phokin
80.	Vladimir	Ponomarev
81.	Vasiliy	Rak
82.	Andrey	Rogovik
83.	Oleg	Rubenkov

#	First name	Surname
84.	Igor	Rumyantsev
85.	Vladimir	Sandugey
86.	Zoya	Satusheva
87.	Olga	Semiushkina
88.	Valeriy	Shatayev
89.	Natalia	Shershneva
90.	Vadim	Shumanskiy
91.	Viktor	Smirnov
92.	Alexey	Smirnov
93.	Anna	Smirnova
94.	Petr	Sockiy
95.	Vladislav	Solovyev
96.	Vyacheslav	Suslov
97.	Vladislav	Teres
98.	Alexandra	Tkacheva
99.	Oleg	Tribunko
100.	Dmitry	Tyutin
101.	Alexey	Vasiliev
102.	Yuri	Vasiliev
103.	Ekaterina	Vinogradova
104.	Kirill	Voronezkiy
105.	Tatyana	Vorontsova
106.	Tamara	Voskoboinik
107.	Nikolay	Yakovlev
108.	Sergey	Yakushev
109.	Dmitry	Yarovikov
110.	Vladimir	Yemeshev
111.	Marina	Zabrodskaya
112.	Natalya	Zhuravleva
113.	Mikhail	Zilberstein
114.	Aleksandra	Zinchenko