



**IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION**

FSD CAUSE NO. OF 2021 ()

IN THE MATTER OF THE COMPANIES ACT (2021 REVISION)

IN THE MATTER OF CONVOY GLOBAL HOLDINGS LIMITED

BETWEEN:

KWOK HIU KWAN

Plaintiff

-and-

CONVOY GLOBAL HOLDINGS LIMITED

Defendant

ORIGINATING SUMMONS

TO CONVOY GLOBAL HOLDINGS LIMITED

Cricket Square, Hutchins Drive, PO Box 2681, Grand Cayman, KY1-1111, Cayman Islands

LET THE DEFENDANT, within 14 days after service of this Summons on it, 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 Kwok Hiu Kwan of Flat A, 45/F, Tower 8, Residence Bel-Air, Hong Kong, the Plaintiff seeks the following orders and directions:

1. A declaration that, under the laws of the Cayman Islands, a share capital reduction must be authorized by a Court order pursuant to s.15 of Companies Act (2021 Revision) ("the Act"), unless the company redeems or purchases its shares pursuant to s.37 of the Act;

2. A declaration that Convoy Global Holdings Ltd (“the Company”) is obliged to recognise all of the shares entered onto the Company’s register of members (“the Register”) including but not limited to all shares registered in the name of Mr Kwok Hiu Kwan and Kaisa Financial Group Company Limited;
3. A declaration that the Company’s financial statements and accounts published in February 2021 do not reflect the true share capital of the Company;
4. Ancillary relief to give effect to the declarations set out above;
5. Further or other relief as the Court thinks fit;
6. 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 the 24th day of May 2021



Carey Olsen
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 of issue unless renewed by order of the Court.

IMPORTANT

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

This Originating Summons was issued by Carey Olsen, Attorneys for the Plaintiff, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001 (Ref: 1065207.0002).

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, PO Box 495G, George Town, Grand Cayman, KY1-1106, Cayman Islands.

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 authorized 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.

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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.

[Click here to enter text.](#)

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

yes no

Service of the Originating Summons is acknowledged accordingly.

Attorneys-at-Law for

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 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.

Carey Olsen
PO Box 10008
Level 1
Willow House, Cricket Square
Grand Cayman KY1-1001
Cayman Islands
REF: JL/JG/1065207.0002

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

