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IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 461 OF 1995

BETWEEN: VADLEE DOUGLAS and
ULALEE EBANKS
(as the legal guardians
of HETTIE DOUGLAS)

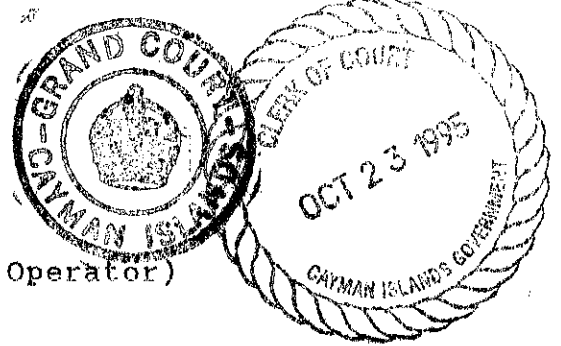
- PLAINTIFFS

AND: MARYLOU WALDROND

- DEFENDANT

WRIT OF SUMMONS

TO: Ms. Marylou Waldron
C/O Cable & Wireless (W.I.) Ltd
Eastern Avenue (works as telephone Operator)
George Town,
Grand Cayman



THIS WRIT OF SUMMONS has been issued against you by the
above-named Plaintiffs 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 Plaintiffs may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this 23rd day of October, 1995.

NOTE - This Writ may not be served later than 4 calendar months

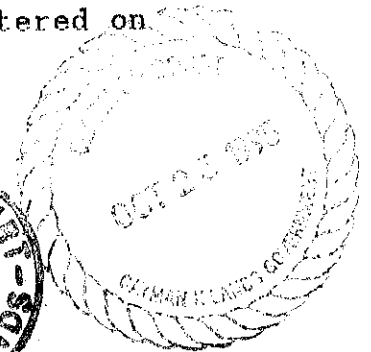
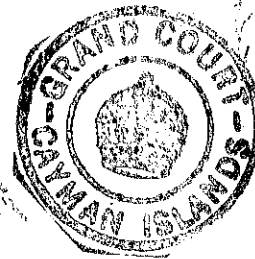
IMPORTANT

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

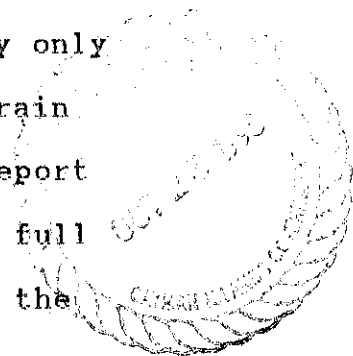


STATEMENT OF CLAIM

1. The Plaintiffs are the daughters of Ms. Hettie Douglas and the sisters of the Defendant. They were also jointly appointed legal guardians of their mother, Ms. Hettie Douglas, on 7th July, 1995.
2. The Defendant is a telephone operator with Cable & Wireless (WI) Ltd., who is also the daughter of Ms. Hettie Douglas and the sister of the Plaintiffs.
3. The Plaintiffs' and the Defendant's mother, Ms. Hettie Douglas, was previously the registered proprietor of the two pieces of property known as Registration Section: George Town Central Block 13EH Parcel 90 and Block 13D Parcel 150, which ownership was with absolute title since on or about 9th October, 1974 and 16th July, 1975, respectively.
4. The Plaintiffs have now discovered that sometime in or about late October, 1992 that their sister, the Defendant, wrongfully induced and procured their mother, the said Ms. Hettie Douglas, to transfer both of these pieces of property to her, absolutely, for "natural love and affection". No valuable consideration was given in relation to either of the transactions. The said transfers were registered on 26th October, 1992 by the Land Registry.



5. The said Ms. Hettie Douglas, is the mother of 9 siblings, one of whom has predeceased her in death, and prior to her suffering from chronic brain syndrome she had always indicated that it was her intention to leave both of these pieces of property to her children, equally. However, sometime in October, 1992 the Defendant wrongfully induced and procured the said Ms. Hettie Douglas to execute Instruments of Transfer, transferring the properties to the Defendant alone purportedly for "natural love and affection". No valuable consideration was given for either of the pieces of the property. The transfers were made without the knowledge or consent of the other siblings.
6. At the time when the said Ms. Hettie Douglas executed the said Instruments of Transfer which purported to transfer the properties to the Defendant, the said Ms. Hettie Douglas did not understand that she was disposing of the property only to the Defendant as she was suffering from chronic brain syndrome. The Plaintiffs will rely on the Medical Report prepared by Dr. La Hee dated 6th March, 1995 for its full terms and effects regarding the medical condition of the said Hettie Douglas at the date of the transfers being executed.
7. The said Ms. Hettie Douglas was induced to execute the said Instruments of Transfer by the undue influence of the Defendant and under her influence and direction and pursuant

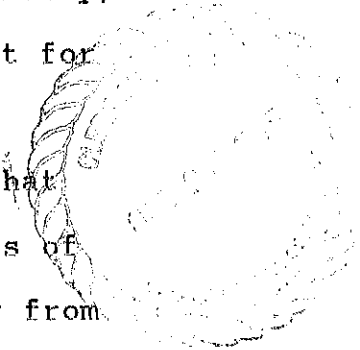


to the faith, trust and confidence which she reposed in the Defendant, as her daughter but without any separate or independent advice and without due consideration of the reasons for or the effect of what she was doing.

8. Further or in the alternative, the said Ms. Hettie Douglas in executing the said transfers did not intend to make a gift to the Defendant and she received no consideration or benefit therefrom. In the premises, the Defendant holds the 2 pieces of property on trust for the siblings of the said Ms. Hettie Douglas, who are beneficially entitled in equity to equal shares of the interest in the land. Alternatively, the Defendant holds the two pieces of property on trust for the said Ms. Hettie Douglas.

9. It has now been brought to the Plaintiffs' attention that the Defendant is actively seeking to use the two pieces of property for the purpose of collateral to borrow money from a bank. After hearing of the Defendant's intention to use the properties as collateral, upon investigation the Plaintiffs and other siblings of the said Ms. Hettie Douglas were shocked and alarmed to learn that the Defendant had had the properties transferred into her name in October, 1992.

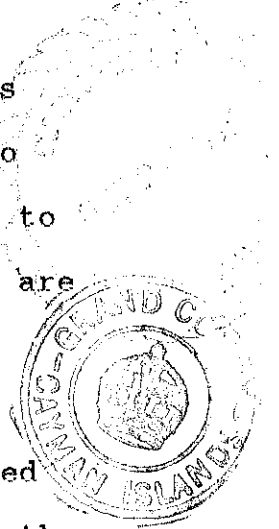
10. After discovering this fact, the Plaintiffs and the other siblings of the said Ms. Hettie Douglas have on a number of



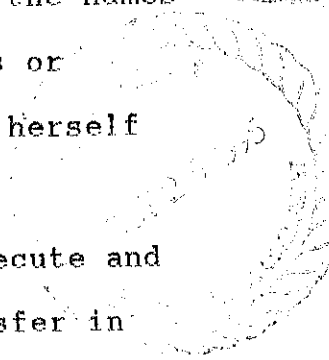
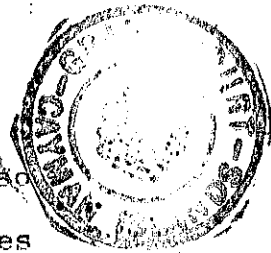
occasions spoken to the Defendant regarding this matter but the Defendant refuses to discuss the matter. The Defendant wrongfully maintains that the properties are hers and that the other siblings have no interest in the properties.

AND THE PLAINTIFFS CLAIM:

1. An Order that registered dealings in the said properties be inhibited until further Order.
2. A Declaration that the said Ms. Hettie Douglas was induced by the undue influence of the Defendant to execute the purported transfers of the properties to the Defendant and that as such the said transfers are null and void.
3. Further or in the alternative:
 - (a) A Declaration that the Defendant as registered proprietor of the 2 parcels of property hold these properties on trust for the said Ms. Hettie Douglas or alternatively that she holds the said properties on trust for herself, and the other siblings of the said Ms. Hettie Douglas.
4. A Declaration that the siblings of the said Ms. Hettie Douglas, including the Defendant are beneficially entitled to the whole of the interest in the properties.



5. A Declaration that the Plaintiffs are entitled to have a Caution registered on the property in accordance with the Registered Land Law (Revised) until this matter is resolved.
6. An Order that the Proprietorship Section of the Register relating to the properties be rectified by cancelling entries Nos. 2 and 3 in the said sections so that the name of the Defendant is deleted and the names of the siblings of the said Ms. Hettie Douglas or alternatively the name of Ms. Hettie Douglas, herself be substituted therefor.
7. Alternatively, an Order that the Defendant execute and deliver to the Plaintiffs Instruments of Transfer in respect of the properties within 7 days of the date of the final Judgement to be given herein for registration under the provisions of the Registered Land Law (Revised).
8. Should the Defendant fail to comply with any Order made herein, requiring her to sign any documentation, an Order that the Clerk of the Courts be authorised and directed to execute the said documentation and deliver it to the Plaintiffs for registration in accordance with the provisions of the Registered Land Law (Revised).
9. Such further or other relief as this Honourable Court



deems necessary.

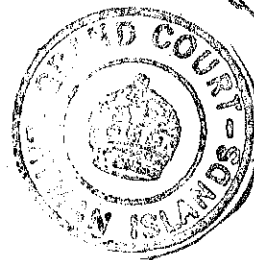
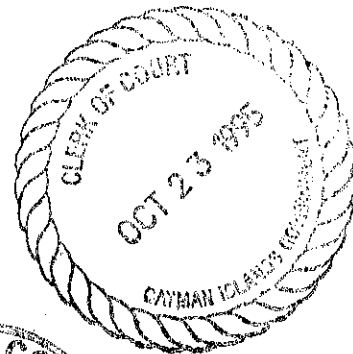
10. Costs of and incidental to this Suit.

Dated this 23rd day of October, 1995

Brooks & Brooks

BROOKS & BROOKS
ATTORNEYS-AT-LAW
FOR THE PLAINTIFFS

TO: The Clerk of the Courts
AND TO: The Defendant
C/O Cable & Wireless (WI) Ltd.,
Eastern Avenue
(works as telephone operator)



THIS WRIT WAS ISSUED by Brooks & Brooks Attorneys-At-Law for the Plaintiffs whose address for service is 2nd Floor Harbour Centre, P.O. Box 1355, George Town, Grand Cayman.

IN THE GRAND COURT OF THE CAYMAN ISLANDS



BETWEEN: VADLEE DOUGLAS and
ULALEE EBANKS
(as the legal guardians
of HETTIE DOUGLAS)

PLAINTIFFS

AND: MARYLOU WALDROND

DEFENDANT

ACKNOWLEDGEMENT 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
judgement 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 judgement entered by the
Plaintiff (tick box)

yes

Service of the Writ is acknowledged accordingly

(Signed)

[Attorney] for

[Defendant in person]

Address for service:

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

Brooks & Brooks
Attorneys-at-Law
P.O. Box 1355, G.T.,
2nd Floor Harbour Centre
George Town
Grand Cayman

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

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 246 of 1995

- (a) Filed on behalf of the PlaintiffS
- (b) Deponent -
- (c) Affidavit # 1
- (d) Sworn on:

BETWEEN: VADLEE DOUGLAS and
ULALEE EBANKS
(as legal guardians
of HETTIE DOUGLAS) - PLAINTIFFS

AND: MARYLOU WALDROND - DEFENDANT

AFFIDAVIT OF SERVICE

I, _____, of George Town Grand Cayman

MAKE OATH AND SAY AS follows:-

1. That I am a Bailiff of the Grand Court, of George Town, Grand Cayman.
2. That on the _____ day of _____, 1995 I did personally serve on MARYLOU WALDROND, the Defendant in this matter, a sealed copy of the Writ of Summons filed in this Cause by handing same to her at _____
3. That the said MARYLOU WALDROND, is known to me personally or was identified to me by _____

AND I MAKE this Affidavit in proof of service of due process upon
the Defendant.

Sworn to at George Town,
Grand Cayman this
day of , 1995
before me

BAILIFF OF THE COURT

JUSTICE OF THE PEACE

Filed by Brooks & Brooks Attorneys-at-Law for the Plaintiffs whose
address for service is 2nd Floor Harbour Centre, P.O. Box 1355,
George Town, Grand Cayman.