

IN THE GRAND COURT
OF THE CAYMAN ISLANDS

CAUSE No 508 of 1998

IN THE MATTER OF SECTION 11 OF THE GRAND COURT LAW
(1995 REVISION)

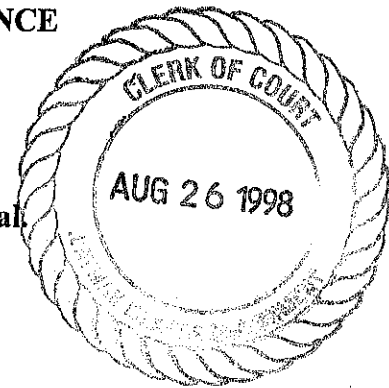
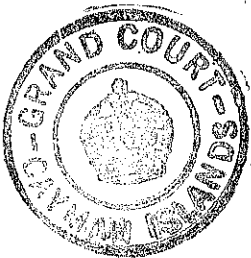
AND

IN THE MATTER OF THE MUTUAL LEGAL ASSISTANCE
(UNITED STATES OF AMERICA) LAW 1986

AND

IN THE MATTER OF ARTHUR C. BIEGANOWSKI et al.

EX PARTE ORIGINATING SUMMONS



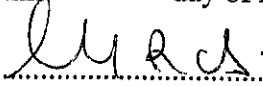
LET ALL PARTIES CONCERNED attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the 27th day of August 1998 at 1:45 o'clock in the fore/afternoon, on the hearing of an application by the Honourable Attorney-General for orders that:

1. ARTHUR C. BIEGANOWSKI, VICTOR J. BIEGANOWSKI, RICHARD J. GOLDBERG, LUCY B. CAMPOS, MARIA ROMERO also known as CONCEPCION MONRREAL, GUSTAVO DIAZ, JESSE JAIME LOPEZ, PATRICIA YVONNE REYES, GUADALUPE RODRIGUEZ MORALES, INTERNATIONAL MEDICAL MANAGEMENT LIMITED PARTNERSHIP, THE KART CORPORATION, MERIT INTERNATIONAL MANAGEMENT & CONSULTING INC., KB RESOURCE TRUST, FOUNDATION TRUST B -102, B - 3000 MANAGEMENT TRUST, THE ELDER CHARITABLE FOUNDATION TRUST, ACB - CENTRAL MANAGEMENT TRUST, MATRIX MANAGEMENT CO., LINCOLN MANAGEMENT LIMITED PARTNERSHIP, and BVTC - 113 TRUST., hereinafter referred to as "the Defendants", and Barclays Bank PLC, Grand Cayman be restrained whether by themselves or by their servants, directors, officers or agents or otherwise howsoever until further order from dealing or attempting to deal in any way howsoever with any funds currently deposited to any account in Grand Cayman at Barclays Bank PLC held in the name(s) of or for the benefit of any of the Defendants, and without prejudice to the generality of the foregoing, from in any way howsoever transferring, assigning, withdrawing, removing from the jurisdiction, disposing of or otherwise dealing with any funds deposited to:-

- (a) account numbers 1944893,7045068 and 7046587 held at Barclays Bank PLC, Grand Cayman in the name of International Medical Management Limited Partnership;
 - (b) account number 2015810 held at Barclays Bank PLC, Grand Cayman in the name of The Kart Corporation;
 - (c) account numbers 2222085 and 7060989 held at Barclays Bank PLC, Grand Cayman in the name of Merit International Management & Consulting Inc. and
 - (d) account numbers 2083832 and 7055330 in the name of Lincoln Management Limited Partnership;
3. The Defendants and the Registrar of Lands for the Cayman Islands be restrained and inhibited whether by themselves or by their servants, directors, officers or agents or otherwise howsoever until further order from selling , transferring or otherwise disposing of or from registering any dealing with the following property:-
 - (a) Unit 835, Britannia Phase II, Bldg. B3, registered as Parcel No. 12D 40 H72 in the name of Matrix Management Company Inc., located at registration section, described as West Bay Beach South, Grand Cayman.
 - (b) Unit 836 Britannia Phase II, Bldg. B3, registered as Parcel No. 12D 40 H73, in the name of Merit International Management & Consulting Inc., located at registration section, described as West Bay Beach South, Grand Cayman.
4. The Court file in relation to this matter be deemed a closed file to be kept in a safe place in the office of the Clerk of Courts until further order.
5. Substituted service of the Order of the Court and a copy of the affidavit of Cheryl Melanie Richards sworn in support thereof shall be effected upon the Defendants by:
 - (a) Effecting service of the said documents upon Barclays Bank PLC Grand Cayman,
 - (b) Effecting service of the said documents upon the Registrar of Lands, George Town, Grand Cayman.
 - (c) Delivery of the said documents to the Office of International Affairs at the Department of Justice of the United States of America and to the Office of United States Attorney for the Western District of Texas, USA for onward delivery to the Defendants.

6. Such further orders or directions as this Honourable Court shall deem fit.

DATED this 26th day of August 1998


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for the Attorney General

TIME ESTIMATE: The estimated length of the hearing of this summons is 1 hour.

This summons was issued on behalf of the Honourable Attorney-General whose address for service is Legal Department, Fourth Floor, Tower Building, PO Box 907, George Town, Cayman Islands.