



IN THE GRAND COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

CAUSE NO: FSD OF 2023 ()

IN THE MATTER OF THE SECTION 46 OF THE COMPANIES ACT (2023 REVISION)

IN THE MATTER OF THE GRAND COURT RULES 1995, ORDER 102(2)(1)(b)

BETWEEN:

(1) OSMAN MOHAMMED ARAB

First Plaintiff

(2) LAI WING LUN

Second Plaintiff

AND

GSN CORPORATIONS LIMITED

Defendant

ORIGINATING SUMMONS

TO: GSN CORPORATIONS LIMITED

c/o Intertrust Corporate Services (Cayman) Limited

One Nexus Way

Camana Bay

Cayman Islands

LET THE DEFENDANT within 14 days after service of this Summons on him counting the day of service, return the accompanying Acknowledgment of Service to the Courts office, P.O. Box 495, George Town, Grand Cayman, KY1-1106.

By this Summons, which is issued on the application of Osman Mohammed Arab and Lai Wing Lun (also known as Johnathan Lai) of RSM Corporate Advisory (Hong Kong) Limited, 29/F, Lee Garden Two, 28 Yun Ping Road, Causeway Bay, Hong Kong (the “**Plaintiffs**”), pursuant to section 46 of the Companies Act (2023 Revision), the Plaintiffs seek orders that:

1. The Register of Members of the Defendant, GSN Corporations Limited (“**GSN**”) be rectified by:
 - (a) amending the number of shares held by HKSCC Nominees Limited (“**HKSCC**”) of 30/F, One Exchange Square, 8 Connaught Place, Central, Hong Kong, by reducing the total shareholding of HKSCC by 743,940,526 ordinary shares (the “**Shares**”); and
 - (b) amending the number of shares held by the Plaintiffs of RSM Corporate Advisory (Hong Kong) Limited, 29/F, Lee Garden Two, 28 Yun Ping Road, Causeway Bay, Hong Kong, by addition of the Shares.

(the “**Rectification**”).
2. The Plaintiffs be authorised to instruct the following parties to rectify the Register of Members of GSN accordingly:
 - (a) GSN; and
 - (b) The registered office service provider of GSN, Intertrust Corporate Services (Cayman) Limited of One Nexus Way, Camana Bay, Cayman Islands (the “**Registered Office**”);
3. The Rectification shall take effect as from 20 December 2022, as the date on which the Shares were transferred to the Plaintiffs pursuant to the Instrument of Transfer dated 20 December 2022.

4. The Plaintiffs be authorised to instruct GSN and the Registered Office to provide a true copy of the updated Register of Members reflecting the Plaintiffs as the owners of the Shares.
5. Such further or ancillary relief as required.
6. The costs of and incidental to the Plaintiffs' Originating Summons shall be paid by GSN on an indemnity basis, to be summarily assessed.

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 this 24th day of March 2023

Conyers Dill & Pearman LLP

Conyers Dill & Pearman LLP

Attorneys for the Plaintiffs

TIME ESTIMATE- The estimated length of the hearing of this Summons is half of a day.

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 unless renewed by order of the Court.

IMPORTANT

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

THIS Summons was filed by Conyers Dill & Pearman LLP, attorneys for the Plaintiffs, whose address for service is SIX, Cricket Square, P.O. Box 2681, Grand Cayman KY1-1111, Cayman Islands.

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 KY1-1106.

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.

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AND

GSN CORPORATIONS LIMITED

Defendant

ACKNOWLEDGEMENT 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, the Defendant must give the Defendant's post office box number and the physical address of the Defendant's residence or, if the Defendant does not reside in the Cayman Islands, the Defendant must give an address in Grand Cayman where communications for the Defendant 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 the Plaintiff's name, address and reference, if any, in the box below.

Conyers Dill & Pearman LLP
Cricket Square
P.O. Box 2681
Grand Cayman KY1-1111
Cayman Islands

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

[Empty box for Defendant's Attorney indorsement]