

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 562 OF 1998

BETWEEN:

- (1) LESLIE GOLD
- (2) LILI GOLD

Plaintiffs

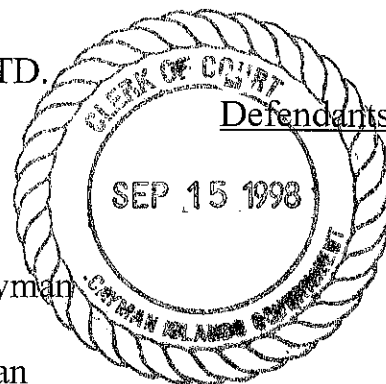
- and -

- (1) MARGARET KEOGH
- (2) GARY HENDREN
- (3) JOSEPH STASIAK
- (4) B.Y.T.R. CORPORATION LTD.

Defendants



WRIT OF SUMMONS



TO: Margaret Keogh, P.O. Box 11450 APO, Grand Cayman
Gary Hendren, P.O. Box 252 NS, Grand Cayman
Joseph Stasiak, P.O. Box 1318 APO, Grand Cayman
B.Y.T.R. Corporation Ltd, c/o Woodward Terry & Co., P.O. Box 822,
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 following pages.

WITHIN 14 DAYS after service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495GT, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

IF YOU FAIL to satisfy the claim or to return the Acknowledgment of Service within the time stated, or if you return the Acknowledgment 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 15th day of September 1998.

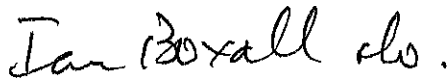
NOTE: THIS WRIT may not be served later than 4 calendar months (*or, if leave is required to effect service out of the jurisdiction, 6 months*) beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

Directions for acknowledgment of service are given with the accompanying form.

AND THE PLAINTIFFS Claim:-

- (1) A declaration that the transfers by the First Defendant to the Second and Third Defendants of her shares in the Fourth Defendant on 8th September 1998 and registered on 8th September 1998 were dispositions made with the intent to defraud the Plaintiffs and are void pursuant to section 4 of the Fraudulent Dispositions Law (1996 Revision).
- (2) An Order setting aside the said share transfers from the First Defendant to the Second and Third Defendants.
- (3) An Order rectifying the Register of Members of the Fourth Defendant to show the First Defendant as the registered owner of the 63.33 ordinary shares she fraudulently transferred as aforesaid.
- (4) A Declaration that the said 63.33 shares stand charged to secure the debt of the First Defendant to the Plaintiffs under the judgment dated 11th September 1998 in Grand Court Cause 136 of 1998.
- (5) An Order that the Defendants be restrained from altering or agreeing to alter the share capital of the Fourth Defendant in any way or charging or pledging or encumbering in any way any of the assets of the Fourth Defendant without leave of the Court until further order or satisfaction by the First Defendant of her debt to the Plaintiffs under the said judgment dated 11th September 1998.
- (6) Further or other relief.
- (7) Costs on a full indemnity basis.



Ian Boxall & Co.

Attorneys for the Plaintiffs

Dated this 15th day of September 1998.

THIS WRIT was issued by Ian Boxall & Co., Attorneys at Law for the Plaintiffs, whose address for service is CIBC Financial Centre, PO Box 1234, George Town, Grand Cayman, Cayman Islands, B.W.I.