

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 judgment may be entered against you forthwith without further notice.

Issued this 21st day of November 2023.

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.

This Writ of Summons and Statement of Claim was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

STATEMENT OF CLAIM**The Parties**

1. The First Plaintiff, SAIF Partners II L.P. (acting by its general partner SAIF II GP Capital Limited) ("**SAIF**") is a Cayman Islands Exempted Limited Partnership. It was established under the Cayman Islands' Exempted Limited Partnership Law (Law 11 of 1991, as amended). The Second Plaintiff, SAIF II GP Capital Limited (in its capacity as the general partner of SAIF) ("**SAIF GP**") is an exempted Cayman Islands company which is (and at all material times was) the general partner of SAIF.
2. Joe Zhixiong Zhou ("**Mr Zhou**" and the "**Defendant**") is a venture capitalist who was a limited partner for SAIF. His last known and usual address is 488 NE18th Street, Unit 3012, Miami, Florida, FL33132, United States of America.
3. Mr Zhou was established as a limited partner of SAIF pursuant to an Amended and Restated Limited Partnership agreement dated 29 June 2005 ("**ALPA**"). Mr Zhou left SAIF in 2007.
4. The Plaintiffs have commenced this action to enforce a judgment given in favour of SAIF against Mr Zhou by the Hong Kong Court of First Instance with case number HCCL 16/2016 (the "**HK Action**"), those proceedings being determined by a decision of Master J Wong dated 4 May 2022 (the "**May 2022 Decision**") and the corresponding order dated 4 May 2022 (the "**May 2022 Order**", together with the May 2022 Decision are referred to as the "**May 2022 Judgment**"). The Plaintiffs seek the recognition of the May 2022 Judgment and the entry of a judgment in favour of SAIF against Mr Zhou in the sum of US\$5,933,253.31 together with interest.
5. The May 2022 Judgment followed from a judgment of Deputy High Court Judge ("**DHCJ**") Richard Field dated 14 February 2018 (the "**HK 2018 Judgment**") and a sealed copy of the judgment (the "**Sealed 2018 Judgment**") where the Plaintiffs were found to have prevailed on one counterclaim against Mr Zhou and an order was made for Mr Zhou to account for profits to SAIF in respect of the counterclaim.
6. Mr Zhou appealed against the May 2022 Judgment but his appeal was dismissed by DHCJ Le Pichon on 9 December 2022 (the "**December 2022 Appeal**").

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Background

The HK Action

7. The background of the HK Action is fully set out in the HK 2018 Judgment. In summary:
 - a. The dispute arose out of a claim by Mr Zhou against the Plaintiffs for carried interest under agreements to which Mr Zhou, SAIF and SAIF GP were parties, including the ALPA. Mr Zhou alleged that he was entitled to a share in a percentage of the carried interest under the agreements which remain unpaid. Mr Zhou's entitlement to the carried interest was disputed by the Plaintiffs.
 - b. On the other hand, the Plaintiffs asserted that Mr Zhou had breached his fiduciary duties to SAIF under the ALPA, including by putting his personal interest ahead of SAIF by diverting business opportunities to himself relating to the "Xinrui Investment" (as defined below).
8. A summary of the relevant procedural background of the HK Action is set out below.
9. On 14 February 2018, DHCJ Field handed down the HK 2018 Judgment wherein he found for Mr Zhou on his claim for more than US\$22 million (which the Plaintiffs have promptly paid) and found for SAIF on one of the Plaintiffs' counterclaims against Mr Zhou.
10. In respect of the successful counterclaim, DHCJ Field found that, while a partner in SAIF, Mr Zhou had diverted a new technology for internet advertising which could have been profitably developed by an investment target of SAIF to a company named Xinrui in which Mr Zhou afterwards acquired a personal interest. After Mr Zhou left SAIF, he joined a rival fund (Kleiner Perkins Caulfield & Byers or "**KPCB**") and caused KPCB to invest in Xinrui (the "**Xinrui Investment**"). Mr Zhou then set up his own fund, Keytone Ventures LP or "**KV**", and caused KV to purchase the Xinrui Investment from KPCB. These acts amounted to a breach of fiduciary duties owed by Mr Zhou to SAIF under the ALPA.
11. Following the issuance of the HK 2018 Judgment, and as shown in the Sealed 2018 Judgment, DHCJ Field ordered that, *inter alia*, Mr Zhou was to account to

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SAIF for any profit that he had made as a result of the investment made by KPCB relating to the Xinrui Investment, and all necessary enquiries and accounts be taken to identify such profits made by Mr Zhou, with liberty given to SAIF to seek directions for the taking of such accounts. DCHCJ Field subsequently issued his ruling on costs on 25 April 2018 (the "**Costs Ruling**").

12. On 26 June 2018, when Mr Zhou failed to comply with the Sealed 2018 Judgment, DHCJ Field made a further account order with a wider scope coupled with corresponding disclosures required of Mr Zhou (the "**Account Ruling**").
13. Mr Zhou appealed against the HK 2018 Judgment, the Account Ruling and the Costs Ruling.
 - a. His appeal was dismissed by the Hong Kong Court of Appeal in a judgment dated 12 July 2019.
 - b. He made a further appeal to the Hong Kong Court of Final Appeal, but this was likewise dismissed. Having failed in his appeal, Mr Zhou had thereby exhausted all avenues of appeal and was required to discharge the relevant obligations imposed on him under the HK 2018 Judgment, the Account Ruling and the Costs Ruling.
14. Under the terms of the Account Ruling, a subsequent hearing for the taking of account took place. This was heard by Master J Wong for 4 days in March 2022, and resulted in the issuance of the May 2022 Judgment.
15. In the May 2022 Judgment, Master Wong granted 5 of the 7 heads of claim advanced by SAIF, and in so doing, ordered Mr Zhou to pay SAIF:
 - a. A total sum of US\$5,933,253.31 comprising:
 - i. Salaries from KPCB: US\$267,857.14 ("**Salaries from KPCB**")
 - ii. Management fees from KPCB: US\$200,000 ("**Management Fees from KPCB**")
 - iii. Capital gains and Carried interest earned from KV: US\$800,217.60 ("**Capital Gains and Carry from KV**")

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- iv. Salaries from KV: US\$1,272,321.43 ("**Salaries from KV**")
- v. Management fees from KV: US\$3,392,857.14 ("**Management Fees from KV**")
- b. Interest on the sum of US\$267,857.14 (being the Salaries from KPCB) at:
 - i. Prime rate + 1%, the usual commercial rate, from April 2008 to 4 May 2022; and
 - ii. Thereafter at the Hong Kong judgment rate until payment.
- c. Interest on the sum of US\$200,000 (being the Management Fees from KPCB) at:
 - i. Prime rate + 1%, the usual commercial rate, from April 2008 to 4 May 2022; and
 - ii. Thereafter at the Hong Kong judgment rate until payment.
- d. Interest on the sum of US\$800,217.60 (being the Capital Gains and Carry from KV) at:
 - i. Prime rate + 1%, the usual commercial rate, from February 2012 to 4 May 2022; and
 - ii. Thereafter at the Hong Kong judgment rate until payment.
- e. Interest on the following sums (each comprising the Salaries from KV) at
 - (i) prime rate + 1%, the usual commercial rate, from the respective dates to 4 May 2022 and (ii) thereafter at the Hong Kong judgment rate until payment.
 - i. US\$267,857.14 from April 2009
 - ii. US\$267,857.14 from April 2010
 - iii. US\$267,857.14 from April 2011

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- iv. US\$267,857.14 from April 2012
 - v. US\$200,892.86 from December 2012
- f. Interest on the following sums (each comprising the Management Fees from KV) at (i) prime rate + 1%, the usual commercial rate, from the respective dates to 4 May 2022 and (ii) thereafter at the Hong Kong judgment rate until payment.
- i. US\$714,285.71 from April 2009
 - ii. US\$714,285.71 from April 2010
 - iii. US\$714,285.71 from April 2011
 - iv. US\$714,285.71 from April 2012
 - v. US\$535,714.28 from December 2012
16. The Hong Kong judgment rate prevailing at the date of the May 2022 Judgment, 4 May 2022, was 8.00% per annum as determined by the Chief Justice pursuant to section 49(1)(b) of the Hong Kong High Court Ordinance (Cap 4). The judgment rate has since increased to 8.169% per annum on 1 January 2023, to 8.583% per annum on 1 April 2023, to 8.662% per annum on 1 July 2023 and to 8.798% per annum on 1 October 2023, respectively.
17. The historic Prime rates adopted by the Hong Kong Census and Statistics Department over the period commencing April 2008 to 4 May 2022 is set out below.
- a. April 2008 to 31 December 2008: 5.39%;
 - b. 1 January 2009 to 31 December 2017: 5%;
 - c. 1 January 2018 to 31 December 2018: 5.03%;
 - d. 1 January 2019 to 31 December 2019: 5.1%; and
 - e. 1 January 2020 to 4 May 2022: 5%.
18. Mr Zhou appealed against the May 2022 Judgment but his appeal was dismissed by DHCJ Le Pichon on 9 December 2022. Mr Zhou lodged a further appeal against the May 2022 Judgment before the Hong Kong Court of Appeal, which is yet to be

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heard. No stay of execution was granted nor did Mr Zhou apply for a stay of execution of the May 2022 Judgment pending this appeal.

19. Notwithstanding the pendency of the appeal, the May 2022 Judgment is final and conclusive and evidences a debt for a certain sum – comprising the principal sum of US\$5,933,253,31 and:
- a. In respect of the sum of US\$267,857.14 (i.e. the Salaries from KPCB), accrued pre-judgment interest amounts to US\$227,597.10 based on the usual commercial rate from April 2008 to 4 May 2022, wherein the interest for each period is calculated as set out below.

Principal (USD)	Interest Start Date	End of Period	Prime Rate	Prime + 1 Rate	Number of Days	Interest Accrued (USD)
267,857.14	2008/04/01	2008/12/31	5.39%	6.39%	275	12,860.44
267,857.14	2009/01/01	2017/12/31	5%	6%	3,287	144,642.86
267,857.14	2018/01/01	2018/12/31	5.03%	6.03%	365	16,151.79
267,857.14	2019/01/01	2019/12/31	5.1%	6.1%	365	16,339.29
267,857.14	2020/01/01	2021/12/31	5%	6%	731	32,142.86
267,857.14	2022/01/01	2022/05/04	5%	6%	124	5,459.88
Total Pre-Judgment Interest on the Salaries from KPCB						227,597.10

- b. In respect of the sum of US\$200,000 (i.e. the Management Fees from KPCB), accrued pre-judgment interest amounts to US\$169,939.17 based on the usual commercial rate from April 2008 to 4 May 2022, wherein the interest for each period is calculated as set out below.

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Principal (USD)	Interest Start Date	End of Period	Prime Rate	Prime + 1 Rate	Number of Days	Interest Accrued (USD)
200,000	2008/04/01	2008/12/31	5.39	6.39	275	9,602.46
200,000	2009/01/01	2017/12/31	5	6	3,287	108,000.00
200,000	2018/01/01	2018/12/31	5.03	6.03	365	12,060.00
200,000	2019/01/01	2019/12/31	5.1	6.1	365	12,200.00
200,000	2020/01/01	2021/12/31	5	6	731	24,000.00
200,000	2022/01/01	2022/05/04	5	6	124	4,076.71
Total Pre-Judgment Interest on the Management Fees from KPCB						169,939.17

- c. In respect of the sum of US\$800,217.60 (i.e. the Capital Gains and Carry from KV), accrued pre-judgment interest amounts to US\$493,415.45 based on the usual commercial rate from February 2012 to 4 May 2022, wherein the interest for each period is calculated as set out below.

Principal (USD)	Interest Start Date	End of Period	Prime Rate	Prime + 1 Rate	Number of Days	Interest Accrued (USD)
800,217.60	2012/02/01	2012/12/31	5	6	335	43,946.38
800,217.60	2013/01/01	2017/12/31	5	6	1,826	240,065.28
800,217.60	2018/01/01	2018/12/31	5.03	6.03	365	48,253.12
800,217.60	2019/01/01	2019/12/31	5.1	6.1	365	48,813.27
800,217.60	2020/01/01	2021/12/31	5	6	731	96,026.11

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800,217.60	2022/01/01	2022/05/04	5	6	124	16,311.28
Total Pre-Judgment Interest on the Capital Gains and Carry from KPCB						493,415.45

- d. In respect of the respective sums comprising the Salaries from KV, accrued pre-judgment interest amounts to US\$860,492.88 based on the usual commercial rate from each of the respective dates to 4 May 2022, wherein the interest for each of the individual sums is calculated as set out below.

Principal (USD)	Interest Start Date	End of Period	Prime Rate	Prime + 1 Rate	Number of Days	Interest Accrued (USD)
<i>2009</i>						
267,857.14	2009/04/01	2009/12/31	5	6	275	12,108.61
267,857.14	2010/01/01	2017/12/31	5	6	2,922	128,571.43
267,857.14	2018/01/01	2018/12/31	5.03	6.03	365	16,151.79
267,857.14	2019/01/01	2019/12/31	5.1	6.1	365	16,339.29
267,857.14	2020/01/01	2021/12/31	5	6	731	32,142.86
267,857.14	2022/01/01	2022/05/04	5	6	124	5,459.88
<i>2010</i>						
267,857.14	2010/04/01	2010/12/31	5	6	275	12,108.61
267,857.14	2011/01/01	2017/12/31	5	6	2,557	112,500.00
267,857.14	2018/01/01	2018/12/31	5.03	6.03	365	16,151.79
267,857.14	2019/01/01	2019/12/31	5.1	6.1	365	16,339.29
267,857.14	2020/01/01	2021/12/31	5	6	731	32,142.86

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267,857.14	2022/01/01	2022/05/04	5	6	124	5,459.88
2011						
267,857.14	2011/04/01	2011/12/31	5	6	275	12,108.61
267,857.14	2012/01/01	2017/12/31	5	6	2,192	96,428.57
267,857.14	2018/01/01	2018/12/31	5.03	6.03	365	16,151.79
267,857.14	2019/01/01	2019/12/31	5.1	6.1	365	16,339.29
267,857.14	2020/01/01	2021/12/31	5	6	731	32,142.86
267,857.14	2022/01/01	2022/05/04	5	6	124	5,459.88
2012						
267,857.14	2012/04/01	2012/12/31	5	6	275	12,075.53
267,857.14	2013/01/01	2017/12/31	5	6	1,826	80,357.14
267,857.14	2018/01/01	2018/12/31	5.03	6.03	365	16,151.79
267,857.14	2019/01/01	2019/12/31	5.1	6.1	365	16,339.29
267,857.14	2020/01/01	2021/12/31	5	6	731	32,142.86
267,857.14	2022/01/01	2022/05/04	5	6	124	5,459.88
200,892.46	2012/12/01	2012/12/31	5	6	31	1,020.93
200,892.46	2013/01/01	2017/12/31	5	6	1,826	60,267.86
200,892.46	2018/01/01	2018/12/31	5.03	6.03	365	12,113.84
200,892.46	2019/01/01	2019/12/31	5.1	6.1	365	12,254.46
200,892.46	2020/01/01	2021/12/31	5	6	731	24,107.14
200,892.46	2022/01/01	2022/05/04	5	6	124	4,094.91

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Total Pre-Judgment Interest on the Salaries from KV	860,492.88
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- e. In respect of the respective sums comprising the Management Fees from KV, accrued pre-judgment interest amounts to US\$2,294,647.70 based on the usual commercial rate from each of the respective dates to 4 May 2022, wherein the interest for each of the individual sums is calculated as set out below.

Principal (USD)	Interest Start Date	End of Period	Prime Rate	Prime + 1 Rate	Number of Days	Interest Accrued (USD)
<i>2009</i>						
714,285.71	2009/04/01	2009/12/31	5	6	275	32,289.63
714,285.71	2010/01/01	2017/12/31	5	6	2,922	342,857.14
714,285.71	2018/01/01	2018/12/31	5.03	6.03	365	43,071.43
714,285.71	2019/01/01	2019/12/31	5.1	6.1	365	43,571.43
714,285.71	2020/01/01	2021/12/31	5	6	731	85,714.29
714,285.71	2022/01/01	2022/05/04	5	6	124	14,559.69
<i>2010</i>						
714,285.71	2010/04/01	2010/12/31	5	6	275	32,289.63
714,285.71	2011/01/01	2017/12/31	5	6	2,557	300,000.00
714,285.71	2018/01/01	2018/12/31	5.03	6.03	365	43,071.43
714,285.71	2019/01/01	2019/12/31	5.1	6.1	365	43,571.43
714,285.71	2020/01/01	2021/12/31	5	6	731	85,714.29

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714,285.71	2022/01/01	2022/05/04	5	6	124	14,559.69
2011						
714,285.71	2011/04/01	2011/12/31	5	6	275	32,289.63
714,285.71	2012/01/01	2017/12/31	5	6	2,192	257,142.86
714,285.71	2018/01/01	2018/12/31	5.03	6.03	365	43,071.43
714,285.71	2019/01/01	2019/12/31	5.1	6.1	365	43,571.43
714,285.71	2020/01/01	2021/12/31	5	6	731	85,714.29
714,285.71	2022/01/01	2022/05/04	5	6	124	14,559.69
2012						
714,285.71	2012/04/01	2012/12/31	5	6	275	32,201.40
714,285.71	2013/01/01	2017/12/31	5	6	1,826	214,285.71
714,285.71	2018/01/01	2018/12/31	5.03	6.03	365	43,071.43
714,285.71	2019/01/01	2019/12/31	5.1	6.1	365	43,571.43
714,285.71	2020/01/01	2021/12/31	5	6	731	85,714.29
714,285.71	2022/01/01	2022/05/04	5	6	124	14,559.69
535,714.28	2012/12/01	2012/12/31	5	6	31	2,722.48
535,714.28	2013/01/01	2017/12/31	5	6	1,826	160,714.28
535,714.28	2018/01/01	2018/12/31	5.03	6.03	365	32,303.57
535,714.28	2019/01/01	2019/12/31	5.1	6.1	365	32,678.57
535,714.28	2020/01/01	2021/12/31	5	6	731	64,285.71
535,714.28	2022/01/01	2022/05/04	5	6	124	10,919.77

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Total Pre-Judgment Interest on the Management Fees from KV	2,294,647.70
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- f. Post-judgment interest accrued on the judgment debt owing as at the May 2022 Judgment (that is, US\$9,979,345.61, comprising the principal sum of US\$5,933,253.31 and the total pre-judgment interest of US\$4,046,092.30¹) amounts to US\$1,284,646.08 based on the applicable Hong Kong judgment rate from 5 May 2022 up to 21 November 2023, wherein the interest is calculated as set out below.

Principal (USD)	Interest Start Date	End of Period	Interest Rate	Number of Days	Interest Accrued (USD)
9,979,345.61	2022/05/05	2022/12/31	8.00%	241	527,128.17
9,979,345.61	2023/01/01	2023/03/31	8.169%	90	201,011.36
9,979,345.61	2023/04/01	2023/06/30	8.583%	91	213,545.15
9,979,345.61	2023/07/01	2023/09/30	8.662%	92	217,878.92
9,979,345.61	2023/10/01	2023/11/21	8.798%	52	125,082.48
Total Post-Judgment Interest					1,284,646.08

20. In the meantime, post-judgment interest continues to accrue in respect of the US\$9,979,345.61 that was owing as at the date of the May 2022 Judgment at the applicable Hong Kong judgment rate from time to time. As of present date, the interest on the sum of US\$9,979,345.61 is accruing at a rate of 8.798% per annum (or a daily rate of US\$2,405.43).

¹ Pre-judgment interest of US\$4,046,092.30 is derived from the cumulative total of the pre-judgment interest accrued on the Salaries from KPCB (US\$227,597.10), the Management Fees from KPCB (US\$169,939.17), the Capital Gains and Carry from KPCB (US\$493,415.45), the Salaries from KV (US\$860,492.88) and the Management Fees from KV (US\$2,294,647.70).

This Writ of Summons and Statement of Claim was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

21. As of present date, the total debt evidenced by the May 2022 Judgment which remains due and payable by Mr Zhou to SAIF is US\$11,263,991.69, comprising:
- a. the principal sum of US\$5,933,253,31;
 - b. total accrued pre-judgment interest of US\$4,046,092.30; and
 - c. total accrued post-judgment interest of US\$1,284,646.08.

AND THE PLAINTIFFS CLAIM

22. The Plaintiffs seek the recognition of the May 2022 Judgment and the entry of a judgment in favour of SAIF, the First Plaintiff, against Mr Zhou, the Defendant, in this Court in the following amounts.
- a. US\$5,933,253,31;
 - b. In respect of the Salaries from KPCB amounting to US\$267,857.14, total accrued pre-judgment interest of US\$227,597.10;
 - c. In respect of the Management Fees from KPCB amounting to US\$200,000, total accrued pre-judgment interest of US\$169,939.17;
 - d. In respect of the Capital Gains and Carry from KV amounting to US\$800,217.60, total accrued pre-judgment interest of US\$493,415.45; and
 - e. In respect of the total Salaries from KV amounting to US\$1,272,321.43, total accrued pre-judgment interest of US\$860,492.88 ; and
 - f. In respect of the total Management Fees from KV amounting to US\$3,392,857.14, total accrued pre-judgment interest of US\$2,294,647.70; and
 - g. Total accrued post-judgment interest of US\$1,284,646.08 as of the date of the filing of this Writ of Summons.
23. Interest on the judgment debt owing as at the May 2022 Judgment of US\$9,979,345.61 at a rate of 8.798% per annum (or a daily rate of US\$2,405.43)

This Writ of Summons and Statement of Claim was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

running from the date immediately after the filing of this Writ of Summons to the date of registration of the May 2022 Judgment in the Cayman Islands

24. Interest from the date of registration of the May 2022 Judgment in the Cayman Islands at the rate of 2.375% per annum, pursuant to Section 34 of the Judicature Act (2021 Revision) and the Judgment Debts (Rate of Interest) Rules (2021 Revision).
25. Costs of and occasioned by this application to be paid by the Defendant.
26. Such further, consequential and or other relief that is just.

If, within the time for returning the Acknowledgement of Service, the Defendant pay the total amount claimed of US\$11,263,991.69 (including interest and costs, calculated up to 21 November 2023) further proceedings will be stayed. The money must be paid to the First Plaintiff or its Attorney.

Dated this 21st day of November 2023

A handwritten signature in black ink that reads "Carey Olsen". The signature is written in a cursive style and is positioned above a horizontal line.

CAREY OLSEN
Attorneys-at-Law for the Plaintiffs

This Writ of Summons and Statement of Claim was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS**

1. 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.
2. After completion it must be delivered or sent by post to the Law Courts, RO Box 495G, George Town, Grand Cayman KY1-1106, Cayman Islands.
3. A Defendant who states in his Acknowledgment of Service that he intends to contest the Proceedings must also serve a defence on the Attorney for the Plaintiffs (or on the Plaintiffs if acting in person).
4. If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.
5. If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.
6. If the Defendant fails to serve his defence within the appropriate time, the Plaintiffs may enter judgment against him without further notice.
7. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Place complete overleaf

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. 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.
3. 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 Writ of Summons)".
4. 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.
5. 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.
6. 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.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD OF 2023 ()

BETWEEN:

- (1) SAIF PARTNERS II L.P. (ACTING BY ITS GENERAL PARTNER SAIF II GP CAPITAL LIMITED)
- (2) SAIF II GP CAPITAL LIMITED (IN ITS CAPACITY AS THE GENERAL PARTNER OF SAIF PARTNERS II L.P.)

Plaintiffs

AND:

JOE ZHIXIONG ZHOU

Defendant

ACKNOWLEDGMENT 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 judgment 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.

[Click here to enter text.](#)

-
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 judgment entered by the Plaintiffs (tick box)

yes no

Service of the Writ is acknowledged accordingly

(Signed) _____

Attorneys-at-Law for the

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

Carey Olsen
Level 1, Willow House, Cricket
Square, Grand Cayman, Cayman
Isalnds, KY1-1001

(DO/10711118.0008)

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