



**IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION**

**CAUSE NO: FSD OF 2024 ( )**

**BETWEEN**

**YI ZHANG**

**PLAINTIFF**

**AND**

- (1) APEX PROSPECT LIMITED**
- (2) HUI SHAO**
- (3) BO TAN**
- (4) AJIT SHETTY**
- (5) VIREN MEHTA**
- (6) SHAOJING TONG**
- (7) RACHEL YU**
- (8) YUNTAO CUI**
- (9) JIN WANG**
- (10) HENRY CHEN**
- (11) HAITAO ZHAO**
- (12) PIERSON YUE PAN**
- (13) CHUNYUAN (BRENDA) WU**
- (14) YS BIOPHARMA CO., LTD**

**DEFENDANTS**

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**WRIT OF SUMMONS**

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**TO: APEX PROSPECT LIMITED**  
VISTRA (CAYMAN) LIMITED  
P. O. Box 31119  
Grand Pavilion,  
Hibiscus Way,  
802 West Bay Road, Grand  
Cayman, KY1 - 1205  
Cayman Islands

**HUI SHAO**  
5 Oak LN  
Green Brook,  
New Jersey,  
08812,  
United States of America

**BO TAN**  
Flat C, 32/F, BLK 6B,  
Imperial Cullinan,  
10 Hot Fai Road,  
Kowloon,  
Hong Kong

**AJIT SHETTY**  
Zeedijk-Knokke  
G43 bus 111,  
8300 Knokke,  
Belgium

**VIREN MEHTA**  
61 Jane Street,  
Apt 12A New York,  
New York  
10014-5158,  
United States of America

**SHAOJING TONG**

FLT C 18/F, BLK 5,  
The Visionary,  
1 Ying Hong Road,  
New Territories,  
Hong Kong

**RACHEL YU**

14 Juliet Ct,  
Princeton,  
New Jersey 08540,  
United States of America

**YUNTAO CUI**

c/o YS BIOPHARMA CO., LTD  
MAPLES CORPORATE SERVICES LIMITED  
P. O. Box 309  
Ugland House,  
South Church Street,  
George Town,  
Grand Cayman KY1-1104  
Cayman Islands

**JIN WANG**

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MAPLES CORPORATE SERVICES LIMITED  
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**HENRY CHEN**

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**HAITAO ZHAO**

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**PEARSON YUE PAN**

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**YS BIOPHARMA CO., LTD**

MAPLES CORPORATE SERVICES LIMITED  
P. O. Box 309  
Ugland House,  
South Church Street,  
George Town,  
Grand Cayman KY1-1104  
Cayman Islands

**THIS WRIT OF SUMMONS** has been issued against you by the above-named Plaintiff in respect of the claim set out on page 6.

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, PO Box 495G, George Town, Grand Cayman KY1-1106, Cayman Islands, 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 of Service without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 20<sup>th</sup> day of February 2024

**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.

**GENERAL ENDORSEMENT****THE PLAINTIFF** claims:

- 1 A declaration that: (a) the purported issue on or about early February 2024 by the Fourteenth Defendant (**the Company**) of 95,269,762 ordinary shares (the **Share Issue** and the **Contested Shares** respectively); and (b) the allotment of those shares to the First Defendant (**APL**) were invalid and of no effect.
- 2 Further or alternatively, a declaration that the Share Issue and allotment were approved by the Second to Seventh Defendants for an improper purpose and in breach of fiduciary duty and an order that the Share Issue and allotment be set aside.
- 3 An order that the Company's share register be rectified to remove reference to the shares purportedly allotted to APL.
- 4 An injunction restraining APL from exercising any voting or other rights attaching to the Contested Shares or holding itself out as a shareholder in the Company.
- 5 A declaration that: (a) the notice dated 12 February 2024 purportedly removing the Plaintiff as a director of the Company (the **Removal Notice**) was invalid and of no effect; and (b) the Plaintiff has at all times since 16 November 2020 been, and remains, a director of the Company.
- 6 A declaration that: (a) the resolution purportedly passed on 13 February 2024 appointing the Eighth to Thirteenth Defendants as directors of the Company was invalid and of no effect; and (b) the Eighth to Thirteenth Defendants are not, and have at no time been, directors of the Company.
- 7 An injunction restraining the Eighth to Thirteenth Defendants from holding themselves out to be directors and from taking any steps to exercise any powers as though they were directors.
- 8 Further or alternatively, as against the Second to Seventh Defendants, damages and/or equitable compensation.
- 9 Costs.

**THIS WRIT** was issued by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiff, whose address for service is 3<sup>rd</sup> Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002, Cayman Islands (Ref: 062533-0003-BPH/LJF).

- 10 Interest on all damages and costs in accordance with section 34 of the Judicature Act (2021 Revision)
- 11 Such further or other relief that the Honourable Court thinks fit.

Dated 20 February 2024



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**Harney Westwood & Riegels**

Attorneys-at-Law for and on behalf of the Plaintiff

**THIS WRIT** was issued by Harney Westwood & Riegels, Attorneys-at-Law for the Plaintiff, whose address for service is 3<sup>rd</sup> Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002, Cayman Islands (**Ref:** 062533-0003-BPH/LJF).

**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.

After completion it must be delivered or sent by post to the Law Courts, PO Box 495G, George Town, Grand Cayman KY1-1106, Cayman Islands.

- 2 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 Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 7), 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.

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.

If the Defendant fails to serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

- 3 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 2024 ( )

BETWEEN

YI ZHANG

PLAINTIFF

AND

- (1) APEX PROSPECT LIMITED
- (2) HUI SHAO
- (3) BO TAN
- (4) AJIT SHETTY
- (5) VIREN MEHTA
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- (13) CHUNYUAN (BRENDA) WU
- (14) YS BIOPHARMA CO., LTD

DEFENDANTS

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ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS

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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.

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 Plaintiff (tick box)

yes  no

Service of the Writ is acknowledged accordingly

(Signed) \_\_\_\_\_  
Attorney for

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 be Plaintiff if suing in person) of his name, address and reference, if any in the box below.

Harney Westwood & Riegels  
3rd Floor, Harbour Place  
103 South Church Street  
PO Box 10240  
Grand Cayman KY1-1002  
Cayman Islands  
**(Ref: 062533-0003-BPH/LJF)**

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