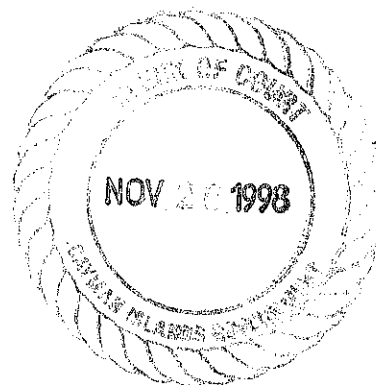


IN THE MATTER of The Deed of Settlement
made the 5th day of January, 1984 between
Captain Pandelis Christos Lemos and Roywest
Trust Corporation (Cayman) Limited and others
(known as the Trofos Foundation)

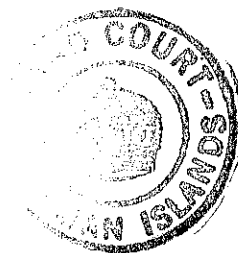
- BETWEEN:
- (1) PANDELIS CHRISTOS LEMOS
 - (2) MARIKA CHRISTOS LEMOS
 - (3) PANDELIS GEORGIOS LEMOS (a minor)
(by GEORGIOS PANDELIS LEMOS
his father and next friend)
 - (4) ASPASIA GEORGIOS LEMOS (a minor)
(by GEORGIOS PANDELIS LEMOS
her father and next friend)
 - (5) AIKATERINI GEORGIOS LEMOS (a minor)
(by GEORGIOS PANDELIS LEMOS
her father and next friend)



PLAINTIFFS

and

- (1) COUTTS (CAYMAN) LIMITED
- (2) COUTTS (JERSEY) LIMITED
- (3) SEATON TRUSTEES INC.
(a company incorporated in the Turks & Caicos Islands)
- (4) PARTHENON TRUSTEES INC.
(a company incorporated in the Turks & Caicos Islands)
- (5) ASPASIA PANDELIS LEMOS
- (6) DIMITRI JOHN SAMONAS
- (7) IONNA DIMITRI SAMONAS
- (8) MARIGO PATITSAS
- (9) JOHN DIMITRI SAMONAS
- (10) LEON JOHN SAMONAS
- (11) PHILEMON SPYROS PATITSAS
- (12) LEON SPYROS PATITSAS
- (13) THE LEON LEMOS CHARITABLE
FOUNDATION



DEFENDANTS

ORIGINATING SUMMONS

ORIGINATING SUMMONS

TO: (1) Coutts (Cayman) Limited, (2) Coutts (Jersey) Limited, (3) Seaton Trustees Inc. (a company incorporated in the Turks & Caicos Islands) and (4) Parthenon Trustees Inc. (a company incorporated in the Turks & Caicos Islands) whose address for service is in each case care of Maples and Calder of P.O. Box 309GT, Uglund House, George Town, Grand Cayman and who are the present trustees of the above-named Trofos Foundations (hereinafter referred to as "the Foundation").

AND TO (5) Aspasia Pandelis Lemos of 34 Harilaou Trikoupi, Kefalari 145 62, Athens, (6) Dimitri John Samonas, care of John Samonas & Sons, Princeton Mews, 167/169 London Road, Kingston-upon-Thames, Surrey KT2 6PJ, (7) Ioanna Dimitri Samonas of Megaron Floisvos, 2A Atlantos Street, Paleon, Faliron 175 61, Greece, (8) Marigo Patitsas of 4 Makedonias Street, 152 37 Filothei, Athens, (9) John Dimitri Samonas of Flat 23, Fursecroft, Brown Street, London W1H 5LS, (10) Leon John Samonas of Flat 23, Fursecroft, Brown Street, London W1H 5LS, (11) Philemon Spyros Patitsas of 10 Korai Street, Kifissia, Athens 145 61, (12) Leon Spyros Patitsas of Gracie Station, P.O. Box 448, New York 10028 U.S.A. and (13) Leon Lemos Charitable Foundation care of The President, Christos Lemos, 27 Bracknell Gardens, Hampstead, London, NW3 7EE, who are beneficiaries under the Foundation.

LET the Defendants within 14 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgement of Service to the Courts Office, P.O. Box 495G, George Town, Grand Cayman, Cayman Islands.

By this Summons which is issued on the application of the Plaintiffs Pandelis Christos Lemos, Marika Christos Lemos, Pandelis Georgios Lemos (a minor, by his father and next friend Georgios Pandelis Lemos), Aspasia Georgios Lemos (a minor, by her father and next friend Georgios Pandelis Lemos), and Aikaterini Georgios Lemos (a minor, by her father and next friend Georgios Pandelis Lemos), who are beneficiaries under the trusts of the Foundation and who sue in that capacity, each of whose address for service is care of W.S. Walker & Company, P.O. Box 265, Caledonian House, George Town, Grand Cayman, the Plaintiffs seek the following relief and orders:

1. That directions may be given as to whether the First to Fourth Defendants as Trustees of the Foundation –
 - (a) should retain the ships presently owned by the Foundation and held as part of the Shipping Capital Fund thereof, namely the Oinoussian Father, Oinoussian Seaman, Oinoussian Strength, Oinoussian Lion, Oinoussian Legend and Oinoussian Leader, or alternatively,
 - (b) should sell all of the said ships or some of them, and if some of them, that directions may be given as to which of the ships should be sold, alternatively,
 - (c) should take some other action with regard to the preservation of the assets of the said Shipping Capital Fund, and, if so, what action.
2. Alternatively to paragraph 1 above orders –
 - (a) that the First to Fourth Defendants be removed as Trustees of the Foundation and that some other fit and proper person or persons be appointed as such Trustees in their place; and/or

- (b) that the Shipping Capital Fund of the Foundation may so far as necessary be constituted as a separate trust for investment purposes only to be held in every other respect on the present trusts of the Foundation and that some fit and proper person or persons (other than the First to Fourth Defendants) be appointed as Trustees of the trusts of the Shipping Capital Fund as so constituted.
3. That the Plaintiffs be appointed to represent all unborn and unascertained persons entitled to any benefit under the trusts of the foundation.
 4. That all necessary and proper directions may be given.
 5. Further or other relief.
 6. That provision be made for the costs of this Originating Summons.

If the Defendants do not acknowledge service, such judgment may be given or order made against or in relation to them as the Court may think just or expedient.

DATED the 20th day of November 1998

W. S. Walker & Company
W. S. WALKER & COMPANY
Attorneys-at-Law for the Plaintiffs

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 ORIGINATING SUMMONS was issued by W. S. Walker & Company, of P.O. Box 265, Caledonian House, George Town, Grand Cayman, Attorneys-at-Law for the Plaintiffs herein, whose address for service is care of its said Attorneys-at-Law.