

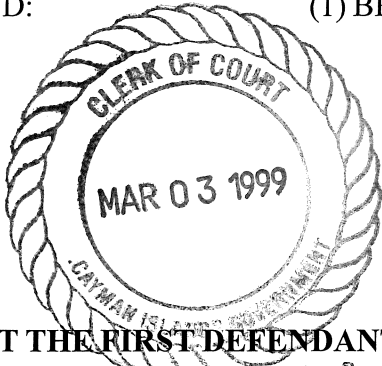
IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 45 OF 1999

BETWEEN: THE SEA LODGES OF CAYMAN KAI PLAINTIFF

AND: (1) BRUCE CAMPBELL & CO (A FIRM)
(2) KEN HALL
(3) SHELLING LTD

DEFENDANTS



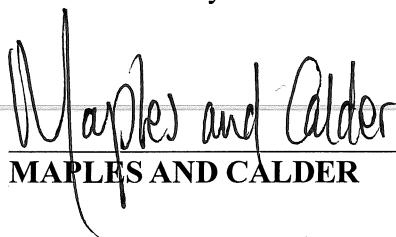
ORIGINATING SUMMONS

LET THE FIRST DEFENDANT attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman, on the 3 day of MAY 1999 at 9:30 a.m. /p.m. on the hearing of an application by the Plaintiff for Orders as follows:

1. That the First Defendant be restrained from further acting on behalf of the Second and Third Defendants herein (Ken Hall and Shelling Ltd) in respect of their disputes against the Plaintiff relating to all matters concerning the Sea Lodges and, in particular, the stratification of the development and the owners' respective rights and obligations under the Strata.
2. That the First Defendant be restrained from disclosing to the Second and Third Defendants herein any information concerning the affairs of the Plaintiff obtained as a result of their prior representation of the Plaintiff.
3. That within 7 days from the date of an order herein, the First Defendant provide to the Plaintiff's attorneys copies of all correspondence and documentation in their files relating to the entire period of their representation of the Plaintiff that has not already been provided to them and that the Plaintiff pay the First Defendant's reasonable costs of photocopying with 7 days of production.
4. That the First Defendant pay the costs of this action.
5. Any other order or relief that the Court deems just.

AND LET THE DEFENDANTS, within 14 days after service of this Summons on them, counting the day of service, return the accompanying acknowledgement of service form to the Court's office.

Dated the 3rd day of March 1999


MAPLES AND CALDER



To the First Defendant, of PO Box 884 GT, BNS Bldg, George Town, Grand Cayman

And to the Second and Third Defendants, whose address for service is c/o Bruce Campbell & Co,
PO Box 884 GT, BNS Bldg, George Town, Grand Cayman

NOTES:

- (1) 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 the above date unless renewed by Order of the Court.
- (2) If a Defendant does not attend personally or by his attorney at the time and place above-mentioned, such Order will be made as the Court may think just and expedient.

IMPORTANT

Directions for acknowledgement of service is given with the accompanying form.

BETWEEN: PROPRIETORS OF THE STRATA #235 (more commonly known as The Sea Lodges of Cayman Kai)

Plaintiff

AND: BRUCE CAMPBELL & CO. (A Firm)

Defendant

ACKNOWLEDGMENT 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.

Delay may result in judgement 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 Originating Summons is being acknowledged. BRUCE CAMPBELL & CO. (A Firm)

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 judgement entered by the Plaintiff (tick box)
[] yes [] no

Service of the Originating Summons is acknowledged accordingly

(Signed).....

Attorneys for the Defendant

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.

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

Maples and Calder Ugland House PO Box 309 GT Grand Cayman Cayman Islands, BWI (ref.: ALP/WLE)

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

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DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE
OF ORIGINATING SUMMONS

1. The accompanying form of Acknowledgement 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.

2. A Defendant who states in his Acknowledgement 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 endorsed on the Originating Summons (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 Originating Summons, unless in the meantime a summons for judgement is served on the Defendant.

If the Statement of Claim is not endorsed on the Originating Summons, 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 judgement 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 judgement 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 Acknowledgement of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgement, 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

Please complete overleaf

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement of Service and return it to the Court's Office.
2. For the purpose of calculating the period of 14 days for acknowledging service, an Originating Summons 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 Originating 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 Court's Office.