

In the matter of the application for payment of reasonable expenses by the Trustee of the Hexagon Welfare Trust, a trust established on the 17th day of September 1996 in the Cayman Islands.

BETWEEN: MOHAMMAD ALI QAYYUM

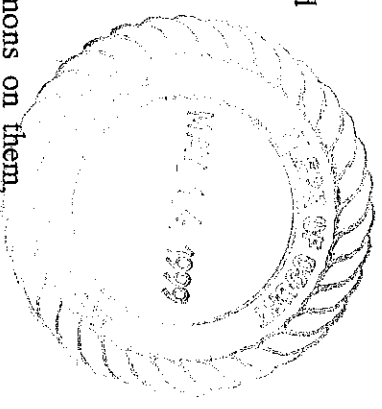
Plaintiff

AND: HEXAGON TRUST COMPANY (C.I.) LTD
(as trustee of the Hexagon Welfare Trust)

Defendant

ORIGINATING SUMMONS

TO: Hexagon Trust Company (C.I.) Ltd
CIBC Bank & Trust Company (Cayman) Limited
P.O. Box 694
Georgetown
Grand Cayman
Cayman Islands. B. W. I.



LET THE DEFENDANT within 14 days after service of this summons on them, counting the day of service, return the accompanying Acknowledgement of Service to the appropriate Court office, P. O. Box 495G, Georgetown, Grand Cayman.

By this summons, which is issued on the application of Mohammad Ali Qayyum, of 105 Dorset House, Gloucester Place, London NW1 5AQ, England, United Kingdom, the Plaintiff claims against the Defendant the following relief, namely:

1. An order that the Defendant as trustee of The Hexagon Welfare trust may be directed to pay the Plaintiff and such other persons identified in the Schedule hereto (a) their reasonable expenses, to include professional fees and expenses and the expenses of travelling and living abroad, and (b) such sums as may be commensurate with their work and services carried out in connection with:

(a) proceedings in the High Court of Justice, London, England concerning the BCCI and ICIC Staff Benefit Trusts;

(b) proceedings in:

- (i) the District Court of the Grand Duchy of Luxembourg
 - (ii) the Court of Appeal in the Grand Duchy of Luxembourg
- relating to the approval of the agreements between the liquidators of BCCI group and the Government of Abu Dhabi;

(c) proceedings in:

- (i) the Grand Court in the Cayman Islands, Grand Cayman
 - (ii) the High Court of Justice, London, England
- relating to the approval of the settlement of US\$70 million and the establishment of the replacement trusts.

2. All necessary and consequential orders and directions.
3. Further or other relief.
4. An order that the Plaintiff's costs of this summons may be paid by the said Trust on an indemnity basis whatever may be the outcome of this summons.

If the Defendant does not acknowledge service, such judgement may be given or order made against or in relation to them as the Court may think just and expedient.

Dated the ^{14th} day of May 1999

L. S. Hall - 6
Attorney - at - Law for the Plaintiff

NOTE - This Summons may not be served later than 4 calendar months beginning with that date unless renewed by order of the Court.

IMPORTANT

Directions for Acknowledgement of Service are given with the accompanying form.

This Originating Summons was issued by the C. S. Gill & Co., attorneys-at-law whose address for service is P. O. Box 945, 4th Floor Genesis Building, Georgetown, Grand Cayman, Cayman Islands. B.W.I.

SCHEDULE

Costs Claimants

- (1) Core members of the Campaign Committee who were instrumental in recovering the assets of the old trusts in the Luxembourg and English Proceedings
The Plaintiff
Raihan Nasir Mahmud
Qaiser Mansoor Malik
- (2) Additional members of the Campaign Committee and Part-time regular helpers
Mohammad Alam
Mashiur Rahman
Mian Abdul Saleem
Halida Shafullah
- (3) Advisor/consultant
Mr Ronald James Rees of CCR Services
- (4) Principal Negotiator
Mr Ajmal Ebrahim Hameed

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 316 OF 1999

BETWEEN: MOHAMMAD ALI QAYYUM

PLAINTIFF

AND: HEXAGON TRUST COMPANY (C.I.) LTD
(as trustee of the Hexagon Welfare Trust)

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 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 Originating Summons is being acknowledged.

2. State whether the Defendant intends to contest or otherwise participate in the proceedings
(tick appropriate box)
 yes no

Service of the Originating Summons is acknowledged accordingly

(Signed)

[Attorney] for

[Defendant in person]

Address for service:

Please complete overleaf

Notes on address for service

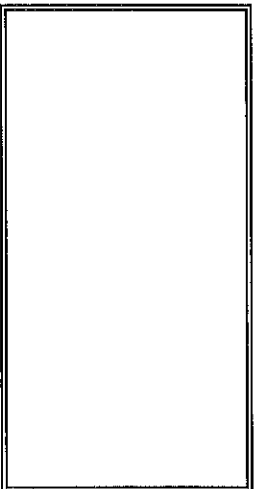
Attorney: Where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

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

C.S. GILL & CO.
4th Floor Genesis Building
PO Box 945
George Town
Grand Cayman

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



DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE OF ORIGINATING SUMMONS

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, PO Box 495G, George Town, Grand Cayman.

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 Courts Office.
2. If you wish to defend claims made in the originating summons, or intend to attend the proceedings and to participate in them so far as necessary (although not necessarily in an adversarial manner) you should tick the "Yes" box in paragraph 2 of the acknowledgement of service.
3. 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.
4. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition of paragraph 1 of the words "sued as (*the name stated on the Writ of Summons*)"
5. 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.
6. 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.
7. 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.
8. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian *ad litem*.
9. A Defendant acting in person may obtain help in completing the form at the Courts Office.