

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 704 OF 1999

BETWEEN SIGN EXPRESS LTD.

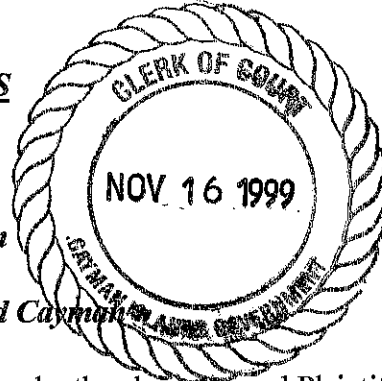
PLAINTIFF

AND CHRISTOPHER DOWNER

DEFENDANT

WRIT OF SUMMONS

TO: Christopher Downer
Apt. #7, Sand Castle Apartments
254 Smith Road, George Town, Grand Cayman
or
Reprografix, Mary Street, George Town, Grand Cayman



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

Within 14 days after service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495G, George Town, Grand Cayman, the accompanying Acknowledgement of Service, stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings the Plaintiff may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this 16th day of November 1999



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 Acknowledgement of Service are given with the accompanying form.

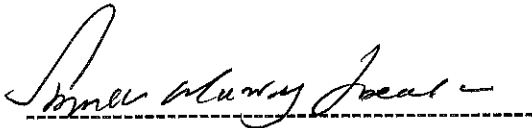
ENDORSEMENT

The Plaintiff claims against the Defendant to recover damages for conversion and detinue in that since July 1999 the Defendant has wrongfully failed and refused to deliver up to the Plaintiff Daihatsu motor vehicle registered 58 731 owned and belonging to the Plaintiff.

AND THE PLAINTIFF CLAIMS:

1. Damages;
2. Loss of use
3. Interest at the Statutory rate;
4. Costs.

Dated this 6th day of November 1999



Signature of Plaintiff or his Attorney

THIS WRIT was issued by Samson Murray Jackson, Attorneys-at-Law, for and on behalf of the Plaintiff, whose address for service is that of their said Attorneys-at-Law, The Ground Floor (West Wing) Sigma Building, Smith/Hospital Roads, George Town, Grand Cayman.

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CAUSE NO. 704 OF 1999

BETWEEN SIGN EXPRESS LTD.

PLAINTIFF

AND CHRISTOPHER DOWNER

DEFENDANT

ACKNOWLEDGEMENT 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 judgement being entered against a Defendant whereby he May have to pay the costs of applying to set it aside.

1. State the name of the Defendant by whom or on whose behalf the service of this Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick the 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

Service of the Writ 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 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 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:

Samson Murray Jackson
PO Box 10067APO
The Ground Floor (West Wing)
Sigma Building
Smith/Hospital Roads
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:

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 704 OF 1999

BETWEEN SIGN EXPRESS LTD.

PLAINTIFF

AND CHRISTOPHER DOWNER

DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is a Registered Company of the Cayman Islands with its Registered Office situate at George Town, Grand Cayman and is engaged, inter alia, in the business of erecting neon signs for various business and persons on the Cayman Islands.
2. The Plaintiff was at all material times the owner and entitled to possession of motor vehicle being Daihatsu truck, bearing licence number 58 731.
3. The Defendant was employed by the Plaintiff in its business and whilst in such employment was permitted to have possession of the said vehicle for the purpose of carrying out work on behalf of the Plaintiff Company.
4. The Plaintiff dismissed the Defendant from its employ in the month of July 1999.
5. The Defendant has since the date of his dismissal from the Plaintiff's employ been in wrongful possession of the Plaintiff's said motor vehicle.
6. The Plaintiff has made various oral demands on the Defendant to return the said motor vehicle to the Plaintiff and on or about the 13th day of August caused a formal letter of demand for the return of the said motor vehicle to be written and given to the Defendant, but the Defendant has wrongfully failed and refused to

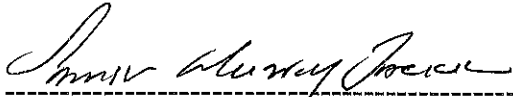
deliver it up to the Plaintiff and has thereby converted the same to his own use and wrongfully deprived the Plaintiff thereof by reason whereof the Plaintiff has suffered loss and damage.

Particulars of Loss and Damage

(a)	Value of the motor vehicle	\$4,500.00
(b)	Loss of use 31 st July 1999 to the present at the rate of C\$10.00 per day (and continuing)	<u>\$ 980.00</u>
		\$5,480.00

AND THE PLAINTIFF CLAIMS DAMAGES FOR CONVERSION

Dated this 6th day of November 1999



Signature of Plaintiff or his Attorney

THIS STATEMENT OF CLAIM was issued by Samson Murray Jackson, Attorneys-at-Law, for and on behalf of the Plaintiff, whose address for service is that of their said Attorneys-at-Law, The Ground Floor (West Wing) Sigma Building, Smith/Hospital Roads, George Town, Grand Cayman.