

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE No. ²⁵⁴ OF 2000

In the Matter of the Estate of John Hyman Scott
And in the Matter of the Succession Law (1995 Revision)

BETWEEN:

- (1) MARWICK HENSLEY FOSTER
- (2) WALTER ERIC WATTS
- (3) ALBERTA LOIS SCOTT CLARK

Plaintiffs

- AND -

- (1) JOHN CROWELL SCOTT
- (2) BETTY RUTH SCOTT MARX
- (3) RERIE LAWRENCE SCOTT
- (4) DERVYN SCOTT

Defendants



WRIT OF SUMMONS

To: (1) John Crowell Scott of P O Box 63, Seabrook, Texas, USA, (2) Betty Ruth Scott Marx of 6030 Southeast 88th Street, Ocala, Florida, USA and (3) Rerie Lawrance Scott of 6209 Sanders Drive, Tampa, Florida, USA and (4) Dervyn Scott of P O Box 90, West End, Cayman Brac, Cayman Islands.

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

WITHIN 14 days in the case of the Fourth Defendant and 28 days in the case of the First, Second and Third Defendants, after 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 495GT,

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 to return the Acknowledgement of Service 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 judgment may be entered against you forthwith without further notice.

ISSUED this 5th day of April 2000

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.

The Plaintiff's claim is for:

1. An order that the First, Second and Third Defendants be removed as administrators of the estate of the said John Hyman Scott (the "Estate") and/or that the grant of letters of administration to them be revoked, and that the Plaintiffs, or some other fit and proper persons, be appointed as administrators in their place and/or be granted letters of administration to the Estate;
2. An order requiring the First to Third Defendants to pay into Court all proceeds of sale and/or other monies received or held by them on behalf of the Estate;
3. Alternatively, an order requiring an account to be given by the First to Third Defendants of all sums received by them on behalf of the Estate;
4. An order restraining the First to Third Defendants until such time as they have been replaced as administrators of the Estate from taking any steps in relation to the Estate, including in relation to the properties set out in the schedule hereto;
5. An order restraining the Fourth Defendant from acquiring or selling the properties set out in the schedule hereto;
6. An order directing the Fourth Defendant to convey to the replacement administrators title to the properties set out numbered 1 and 3 in the schedule hereto;
7. Alternatively, an order imposing inhibitions over the titles to the properties set out in the schedule hereto;
6. An order that the properties set out in the schedule hereto be transferred into the names of the replacement administrators;
7. That all necessary and proper directions be given; and/or
8. Further or other relief; and

9. That provision be made for the Plaintiffs' costs of this action to be paid on an indemnity basis from the Estate.

Boxalls.
BOXALLS

INDORSEMENT AS TO CAPACITY

The Plaintiffs are third generation beneficiaries of the intestate Estate of John Hyman Scott (the "Estate").

The First, Second and Third Defendants are administrators and trustees of the property of the Estate. The Second Defendant is a second generation beneficiary of the Estate, and the First and Third Defendants are third generation beneficiaries of the Estate. The Fourth Defendant is a recipient of property of the Estate.

This Writ was issued by Boxalls, Attorneys at Law, whose address for service is:
PO Box 1234GT, 3rd Floor, Queensgate House, South Church Street, George Town,
Grand Cayman, British West Indies (Reference: 1650-001/EDS)

Schedule of Properties forming part of the Estate

| Number | Registration Section | Block | Parcel No. | Registered Proprietors |
|--------|----------------------|-------|------------|---|
| 1 | Cayman Brac West | 93C | 59 | Dervyn Scott |
| 2 | Cayman Brac West | 93C | 50 | John Crowell Scott and Betty Scott Marx |
| 3 | Cayman Brac West | 95C | 10 | Dervyn Scott |
| 4 | Cayman Brac West | 95B | 76 | John Crowell Scott and Betty Scott Marx |
| 5 | Cayman Brac Central | 102A | 21 | The Personal Representative of the Estate of Maude Mehetabel Scott c/o Eric Y Scott |
| 6 | Cayman Brac Central | 102A | 30 | The Personal Representative of the Estate of Maude Mehetabel Scott c/o Eric Y Scott |
| 7 | Cayman Brac West | 97B | 2 | Rerie L. Scott and Albert L Scott as Administrators of the Estate of John Hyman Scott |
| 8 | Cayman Brac West | 97B | 15 | Rerie L. Scott and Albert L Scott as Administrators of the Estate of John Hyman Scott |
| 9 | Little Cayman East | 92A | 5 | Leonard Selden Tibbetts and Lyman I Owen and Leopold Eden Scott as Administrators of the Estate of Eden Scott (1) and Dervyn Scott as the Executor of the Will of Lawrence Scott (2) and Rerie L Scott and Albert L Scott as Administrators |

| | | | | |
|----|--------------------|-----|-----|--|
| | | | | of the Estate of John Hyman Scott (3) Phyllis Hunter and Alla Mae Gurr as Administratrixs of the Estate of Emma Georgina Hunter (4) Cynthia Scott and Eugene Burch Scott and Janet R Scott as joint trustees (5) and Linton N Tibbetts as Executor of the Estate of Judith Louise Tibbetts (6) |
| 10 | Little Cayman East | 92A | 144 | Rerie L Scott and Albert L Scott as Administrators of the Estate of John Hyman Scott |
| 11 | Little Cayman East | 92A | 150 | Rerie L Scott and Albert L Scott as Administrators of the Estate of John Hyman Scott |

April 5th, 2000

This Writ was issued by Boxalls, Attorneys at Law, whose address for service is:
 PO BOX 1234GT, 3rd Floor, Queensgate House, South Church Street, George
 Town, Grand Cayman, British West Indies (Reference: 1650-001/EDS)