

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 462 OF 2000

BETWEEN:

GHAZI ABDULLA NASIR AL-SAQABI

FIRST PLAINTIFF

ROQIYAH YOUSIF ABDULWAHAB AL-QATAMI

SECOND PLAINTIFF

FAISAL AL-SAQABI

THIRD PLAINTIFF

YOUSUF AL-SAQABI

FOURTH PLAINTIFF

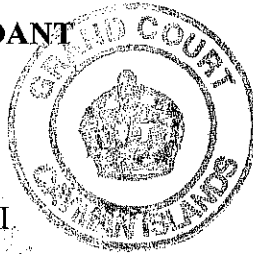
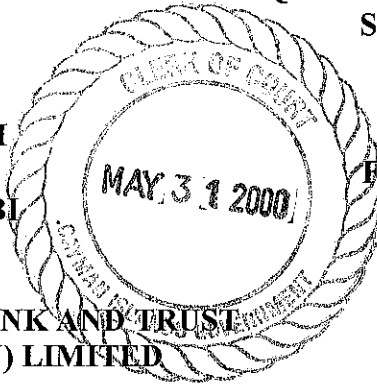
GHADEER AL-SAQABI

FIFTH PLAINTIFF

AND:

MERRILL LYNCH BANK AND TRUST COMPANY (CAYMAN) LIMITED

DEFENDANT



WRIT OF SUMMONS

TO: Merrill Lynch Bank and Trust Company (Cayman) Limited of
PO Box 1164GT, 4th Floor, Harbour Centre, George Town, Grand Cayman, BWI.

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 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 495 GT, 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 within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiffs may proceed with the action and judgement may be entered against you forthwith without further notice.

ISSUED this 31st day of May 2000

NOTE: This Writ may not be served later than 4 calendar 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.

GENERAL ENDORSEMENT

1. The First Plaintiff's claim is made on behalf of himself as Settlor and Beneficiary of two settlements, namely the first made on the 24th day of May 1989 (between the First Plaintiff and the Defendant) and the second made on the 25th day of March 1991 (between the same parties) ("the Al-Saqabi Trusts"). Further, or in the alternative, the First Plaintiff's claim is made for and on behalf of all Beneficiaries of the Al-Saqabi Trusts.
2. The Second to Fifth Plaintiffs' claim is made as Beneficiaries of the Al-Saqabi Trusts and for and on behalf of all minor beneficiaries of the Al-Saqabi Trusts.
3. The Plaintiffs' claim is against the Defendant as Trustee of the Al-Saqabi Trusts for:
 - (1) Damages for negligence/breach of trust in the administration of the Al-Saqabi Trusts and/or breach of Contract and/or breach of fiduciary duty; and/or
 - (2) A Declaration that the Defendant be liable to reconstitute the estate the subject of the Al-Saqabi Trusts by making good to the estate all loss which has accrued or might accrue by reason of the Defendant's negligence/breach of trust and/or breach of Contract and/or breach of fiduciary duty; and or
 - (3) An Inquiry whether any and what property subject to the Al-Saqabi Trusts has been invested by the Defendant and whether and when the investments were sold or realised by the Defendant and whether any or what sum has been lost to the estate subject to the Al-Saqabi Trusts by the investments being made and realised;
 - (4) An Account of what is due to the estate, the subject of the Al-Saqabi Trusts for such loss;
 - (5) Damages in the amount found due on taking the said Account;
 - (6) All other requisite Accounts, Inquiries and Directions;
 - (7) Such further or other relief as the Court shall consider just and necessary;
 - (8) Interest;
 - (9) Costs;

DATED this 31st day of May 2000


RITCH & CONOLLY
Attorneys at Law for the Plaintiffs

To: The Clerk of the Court
AND TO: The Defendant