

CHARLES ADAMS,
RITCHIE &
DUCKWORTH

Fees Paid \$ 150-
Receipt No... 66153
Date... 16.10.00

IN THE GRAND COURT OF THE CAYMAN ISLANDS

478
CAUSE NO. OF 2000

BETWEEN: (1) ELECTRA TECH SERVICES LTD. PLAINTIFF

AND: (1) BRAD GOHLA
(2) MARY JO GOHLA
(3) BNMJ PERFECT WATER RETREATS DEFENDANTS

WRIT OF SUMMONS



TO: BRAD GOHLA
North Side,
Grand Cayman.

AND TO: MARY JO GOHLA
North Side,
Grand Cayman.

AND TO: BNMJ PERFECT WATER RETREATS
P.O. Box 882, Grand Cayman,
Cayman Islands.



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

Within 14 days after the 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 Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment 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 13th day of October, 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 the order of the Court.

IMPORTANT

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

INDORSEMENT

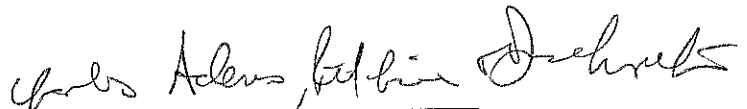
1. The Plaintiff's claim against the 1st Defendant arises out of and/or is connected with the misuse and/or misappropriation of funds belonging to the Plaintiff by the 1st Defendant in breach of his fiduciary and other duties owed to the Plaintiff for the 1st Defendant's own personal use and/or the use of the 2nd and 3rd Defendants; the conversion of cheques drawn by the 1st Defendant on the Plaintiff's account at CNB and the forgeries of the Manager/Electrician's signature committed by the 1st Defendant on cheques drawn on the Plaintiff's account at Cayman National Bank, ("CNB"), account number 01-514-425-444-01.

2. The Plaintiff's claim against the 2nd and 3rd Defendants arises out of the receipt by the 2nd and 3rd Defendants of so much of the Plaintiff's funds as were transferred from account number 01-514-425-444-01 into the account/s of the 1st and 2nd Defendants held at CNB, in particular Cayman Islands Dollar Savings account number 01-522-408-151-01 in the joint names of the 1st and 2nd Defendants; and United States Dollar Savings account number 02-524-401-552-01 in the name of the 3rd Defendant and in any other account/s held in the Cayman Islands or elsewhere.

AND THE PLAINTIFFS' CLAIM against the Defendants:

- (1) A declaration that in respect of the Plaintiff's monies misused and/or misappropriated the 1st Defendant:

- (i) the Plaintiff is entitled to trace such monies and/or the proceeds thereof and/or any assets upon which the said sums or any part thereof have been expended;
 - (ii) such sum and/or the proceeds thereof and/or any assets upon which the said sums or any part thereof have been expended are in equity the property of the Plaintiff;
 - (iii) such sum and/or the proceeds thereof and/or any assets upon which the said sum, or any part thereof, have been expended, are held by the Defendants on trust for the Plaintiff;
- (2). As against the 1st Defendant, the Plaintiff claims damages for loss occasioned by the breach of his fiduciary and other duties owed to the Plaintiff.
- (3) Restitution to the Plaintiff of all monies had and received by the 1st Defendant and/or the 2nd Defendant and/or the 3rd Defendant to the Plaintiff's use.
- (4). Such tracing and/or discovery and/or injunctive and/or equitable or other relief as this Honourable Court deems just.
- (5) Interest on all sums found due to the Plaintiff pursuant to Section 34 of the Judicature Law (1995 Revision) and the rules made thereunder at such rate and for such period as this honourable Court thinks just and/or in equity.
- (6). Costs.



Charles Adams, Ritchie & Duckworth
Attorneys-at-Law for the Plaintiff

THIS WRIT was issued by Charles Adams, Ritchie & Duckworth, Attorneys-at-Law, for and on behalf of the Plaintiff herein, whose address for service is that of their said Attorneys-at-Law, P.O. Box 709G, Zephyr House, Mary Street, George Town, Grand Cayman, B.W.I.