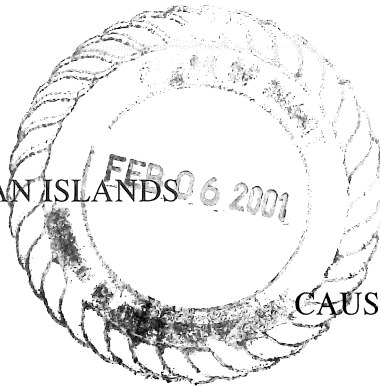


IN THE GRAND COURT OF THE CAYMAN ISLANDS



CAUSE NO. 69 OF 2001

IN THE MATTER of the Confidential Relationships (Preservation) Law (1995 Revision)

AND IN THE MATTER of Ansbacher (Cayman) Limited

AND IN THE MATTER of Inspectors appointment pursuant to the Companies Act 1990 of the Republic of Ireland

EX PARTE ORIGINATING SUMMONS

LET ALL PARTIES CONCERNED attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the 5th day of February, 2001, at 9:30 am, on the hearing of an application by Ansbacher (Cayman) Ltd., whose registered office is at Ansbacher House, P.O. Box: 887 GT, Jennett Street, George Town, Grand Cayman (the "Bank"), for the following orders:


1. A declaration that the Bank is entitled pursuant to section 3 (2)(b)(v) of the Law to divulge the confidential information described in the Schedule hereto to the Inspectors appointed in respect of the Bank by order of the Irish High Court made on 22nd September, 1999. ("the Inspectors").
2. Alternatively, a direction pursuant to Section 4 of the Law that the Bank may give in evidence the confidential information described in the Schedule hereto for the purposes of proceedings being inquired into by the Inspectors.
3. A direction (pursuant to Section 4 (2) of the Law and/or GCR Order 103 Rule 5) that notice of this originating summons be given to –
 - (a) the Inspectors;

- (b) the relevant principals who are existing clients (as defined) of the Bank;
- (c) Hamilton Ross Limited; and
- (d) Poinciana Fund Limited,

and that notice shall not be given to any other relevant principal who was a client (as defined) of the Bank.

4. Such further or other directions as the Court thinks fit.

Dated the 1st day of February, 2001.



Maples and Calder

TO: The Clerk of the Court

AND TO: The Honourable Attorney General
Government Administration Building
George Town
Grand Cayman

TIME ESTIMATE: The estimated length of the first hearing of this summons is ½ day and the estimated length of the substantive hearing is 1-2 days..

This Summons is issued by Maples and Calder, Attorneys-at-Law, whose address for service is Uglan House, P.O. Box 309G, George Town, Grand Cayman, Attorneys-at-Law for the Applicant.

SCHEDULE

Confidential Information to be given in Evidence

1. Certified true copies of such documents in the possession of the Bank as may be reasonably necessary to establish the identity of the Irish resident persons who are or were clients of the Bank and to describe the nature of the client relationship.
2. For the purposes of this Schedule the expression "client of the Bank" shall include (a) any person who maintains or has maintained an account with the Bank; or (b) any person who is or was a beneficial owner of shares of a company which maintains or has maintained an account with the Bank or is or was administered by the Bank; or (c) the settlor of any trust of which the Bank is or was trustee; or (d) any person who had an account relationship with Hamilton Ross Limited and/or Poinciana Fund Limited. The expression "account" shall include deposit accounts, loan accounts, securities accounts and custodian accounts and the expression "settlor" shall mean the person or persons who funded or caused the trust to be funded.