

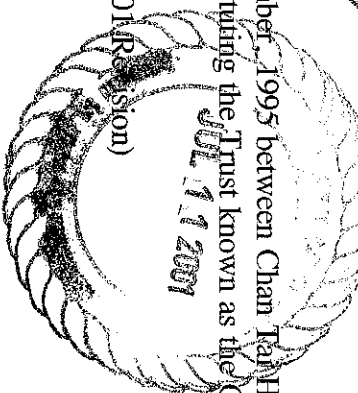
IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: ⁴²¹ OF 2001

IN THE MATTER of the Deed of Settlement dated 1st December, 1995 between Chan Tai Ho as Settlor and Bermuda Trust (Cayman) Limited as Trustee of the Trust known as the Chan Tai Ho - Allen C Family 1995 Trust



IN THE MATTER of the Deed of Settlement dated 1st December, 1995 between Chan Tai Ho as Settlor and Bermuda Trust (Cayman) Limited as Trustee constituting the Trust known as the Chan Tai Ho - Karen C Family 1995 Trust



AND IN THE MATTER of Section 48 of the Trusts Law (2001 Revision)

BETWEEN

Bermuda Trust (Cayman) Limited PLAINTIFF

AND

Chan Chun Lung Allen	FIRST DEFENDANT
Chan Chung Hing Karen	SECOND DEFENDANT
Chan Chung Yan Joanne (a minor)	THIRD DEFENDANT
Chan Kong Yeung Brian (a minor)	FOURTH DEFENDANT
Cheuk Wing Fung Edmond (a minor)	FIFTH DEFENDANT
Cheuk Wing Kin Lawrence (a minor)	SIXTH DEFENDANT
Chan Tai Ho	SEVENTH DEFENDANT

ORIGINATING SUMMONS

- TO: (1) Chan Chun Lung Allen of 9B, Trafalgar Court, 70 Tai Hang Road, Hong Kong;
- (2) Chan Chung Hing Karen of House C, Greenland Villas, Ma Yeung Path, Kau To Shan, New Territories, Hong Kong;

(who claim to be beneficially interested in assets held by Bermuda Trust (Cayman) Limited which were pursuant to or purportedly pursuant to powers conferred by certain Hong Kong trusts transferred to Bermuda Trust (Cayman) Limited as trustee of the above mentioned Deeds of Settlement constituting the Trusts known as the Chan Tai Ho - Allen C Family 1995 Trust and the Chan Tai Ho - Karen C Family 1995 Trust, and who are also eligible to be added as beneficiaries under the trusts of those Deeds)

- (3) Chan Chung Yan Joanne of 9B, Trafalgar Court, 70 Tai Hang Road, Hong Kong;
- (4) Chan Kong Yeung Brian of 9B, Trafalgar Court, 70 Tai Hang Road, Hong Kong;
(who are beneficially interested under the trusts of the above mentioned Deed of Settlement constituting the Trust known as the Chan Tai Ho - Allen C Family 1995 Trust)
- (5) Cheuk Wing Fung Edmond of House C, Greenland Villas, Ma Yeung Path, Kau To Shan, New Territories, Hong Kong;
- (6) Cheuk Wing Kin Lawrence of House C, Greenland Villas, Ma Yeung Path, Kau To Shan, New Territories, Hong Kong;
(who are beneficially interested under the trusts of the above mentioned Deed of Settlement constituting the Trust known as the Chan Tai Ho – Karen C Family 1995 Trust)
- (7) Chan Tai Ho of A 2, Alradena House, 27 Barker Road, Hong Kong;
(who is the Appointor and Guardian under the above mentioned Deeds of Settlement constituting the Trusts known as the Chan Tai Ho – Allen C Family 1995 Trust and the Chan Tai Ho – Karen C Family 1995 Trust, and who is also eligible to be added as a beneficiary under the trusts of those Deeds)

LET THE DEFENDANTS, within 28 days, after service of this Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, PO Box 495 GT, George Town, Grand Cayman.

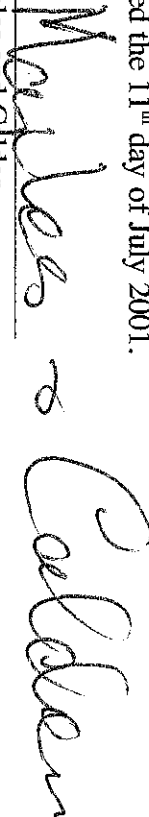
By this Summons, which is issued on the application of Bermuda Trust (Cayman) Limited of P.O. Box 513 GT, 3rd Floor, Bermuda House, British American Centre, George Town, Grand Cayman, on the hearing of an application pursuant to Section 48 of the Trusts Law (2001 Revision) and/or Order 85 of the Grand Court Rules and/or the inherent jurisdiction of the Court of the Plaintiff Bermuda Trust (Cayman) Limited (“the Trustee”), as trustee of the above mentioned Deeds of Settlement constituting the Trusts known as the Chan Tai Ho – Allen C Family 1995 Trust and the Chan Tai Ho – Karen C Family 1995 Trust (together, “the 1995 Trusts”) and as trustee of the trusts of assets held by the Trustee which were pursuant to or purportedly pursuant to powers conferred by certain Hong Kong trusts transferred to the

Trustee as trustee of the 1995 Trusts, by which the Trustee seeks the following orders, directions and relief:

1. That such directions as this Honourable Court shall think fit may be given as to:
 - i. whether any and if so which persons (in addition to the original defendants) should be joined as a party or parties to these proceedings or be served with notice of these proceedings;
 - ii. the appointment of a guardian (or guardians) ad litem for the Third to Sixth Defendants; and
 - iii. what representation orders should be made;
2. That the Trustee of the 1995 Trusts be authorised to exercise the power conferred by Clause 26 of each of the 1995 Trusts to add as Eligible Beneficiaries of the 1995 Trusts certain corporations intended to be identified in an affidavit or affidavits intended to be sworn herein on behalf of the Trustee (“the Trustee’s evidence”);
3. That the Trustee be authorised to exercise the power conferred by Clause 8 of each of the 1995 Trusts to transfer the sum of thirty million Hong Kong dollars to HSBC Trustee (Hong Kong) Limited as trustee of the Hong Kong trust (“the Hong Kong Trust”) intended to be known as the Chan Tai Ho Education and Medical [2001] Trust (in the form or substantially in the form as that intended to be exhibited to the Trustee’s evidence) to be held on the trusts and with and subject to the powers and provisions declared and contained in the Hong Kong Trust of and concerning the Trust Fund as therein defined as one fund therewith for all purposes;
4. That the Trustee be authorised to exercise the power conferred by Clause 8 of each of the 1995 Trust to direct and declare that all the remaining assets of the trust funds of the 1995 Trusts (after the transfer in the preceding paragraph and subject to paragraph 6 below) shall be held by the Trustee as trustee of Cayman trusts (“the A&M Trusts”) (in the form or substantially in the form as that intended to be exhibited to the Trustee’s evidence) to be held on the trusts and with and subject to the powers and provisions declared and contained in the A&M Trusts of and concerning the Trust Fund as therein defined and as one fund therewith for all purposes (subject to certain transitional rights of indemnity in respect of the 1995 Trusts which are intended to be preserved).
5. That the Trustee be authorised to exercise the power of variation contained in Clause 24 of the 1995 Trusts (so far as may be expedient or necessary in connection with paragraphs 3 and 4 above) to confirm that the power conferred by Clause 8 of the 1995 Trusts authorises dispositions into the Hong Kong Trusts and the A&M Trusts and to effect such further variations (if any) as may be necessary or expedient to effect the exercise of powers in the way referred to in paragraphs 3, 4 and 5 above;

6. That the Trustee be authorised to make or do all such things (in addition to the matters mentioned in the preceding paragraphs) as on its part is necessary to bring into effect a compromise of proceedings in the high Court of the Hong Kong Special Administrative Region bearing the distinctive number HCA 4904/96 as approved by an order of Deputy High Court Judge Woolley made in those proceedings on 21st June 2001 (including (i) the receipt and disposition of certain dividends provided for by the Schedule to that Order and the raising of a sum of thirty million Hong Kong dollars out of those dividends (ii) the constitution of the A&M Trusts and (iii) the implementation of certain provisions in the Schedule to that Order concerning the papers held by it as trustee of the 1995 Trusts);
7. That all necessary or proper consequential directions be given;
8. That provision may be made for the retention or payment out of the trust assets held by the Trustee of the costs of these proceedings on the indemnity basis of the Trustee, and any guardian ad litem and any representative defendant appointed or added as a party pursuant to paragraph 1 above.

Dated the 11th day of July 2001.


 Walkers and Calder

TIME ESTIMATE: The estimated length of the hearing of this summons is two days.

To: Walkers
 Attorneys-at-law for
 Chan Chun Lung Allen and
 Chan Chun Hing Karen

And to: Chan Chung Yan Joanne

And to: Chan Kong Yeung Brian

And to: Cheuk Wing Fung Edmond

And to: Cheuk Wing Kin Lawrence

And to: Chan Tai Ho

And to: Clerk of the Court

This Originating Summons was issued by Walkers and Calder, whose address for service is Ugland House, P.O. Box 309 GT, George Town, Grand Cayman, attorneys-at-law for the Plaintiff.