

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 191 OF 1996

IN THE MATTER OF the Trusts of the Will and Codicil  
of the late Robert Selkirk Watler, Deceased

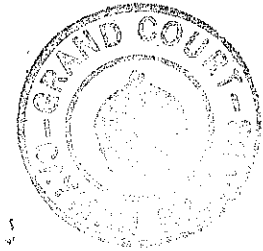
-and-

IN THE MATTER OF Cause No. 174 of 1992

-and-

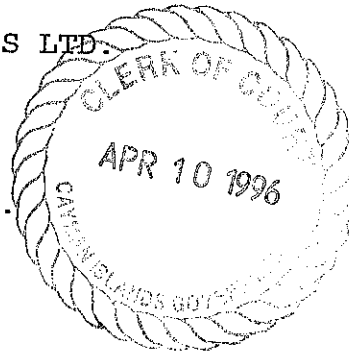
IN THE MATTER OF The Succession Law and of  
The Trust Law (Revised)

BETWEEN: (1) JEFFREY PARKER in his capacity as  
Executor of the Estate of Robert  
Selkirk Watler, Deceased  
(2) RED BAY ESTATES LTD.  
(3) WATLER HOLDINGS LTD.  
(4) FRANK SOUND ESTATES LTD.



PLAINTIFFS

AND: (1) SHANNON PANTON  
(2) SELKIRK WATLER, JR.  
(3) LYNETTE WATLER



DEFENDANTS

ORIGINATING SUMMONS

LET THE DEFENDANTS, at the offices of their attorneys-at-law, Messrs. O.L. Panton & Co., P.O. Box 875, George Town, Grand Cayman attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the 29th day of April, 1996, at 9:30 in the forenoon on the hearing of an application by Jeffrey M. Parker of P.O. Box 30749 SMB, Grand Cayman as Personal Representative of the Estate of Selkirk Watler, deceased, for the following declarations:


1. THAT the actions taken by the Defendants purporting to remove or cause to be removed the 1st Plaintiff as director

of the 2nd and 3rd Plaintiffs are of no effect and in breach of the Shareholders' Agreement dated February 19, 1993.

2. THAT the 1st Plaintiff is the director of the 2nd and 3rd Plaintiffs.
3. THAT the 1st Plaintiff as director of the 2nd Plaintiff is authorized and empowered to complete the sale of Prospect Block 22D Parcel 244 on the terms of the contract of sale dated 7th December, 1994.
4. THAT the 1st Plaintiff is entitled to distribute the proceeds of the said sale in such manner as he may see fit in satisfaction of the testamentary and administrative expenses and creditors of the Estate of Robert Selkirk Watler, deceased.

If the Defendants do not acknowledge service, such judgment may be given or order made against or in relation to him as the Court may think just and expedient.

Dated this 9<sup>th</sup> day of April, 1996.

  
CHARLES ADAMS, RITCHIE & DUCKWORTH  
ATTORNEYS-AT-LAW FOR THE PLAINTIFFS



NOTE - This Summons 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 that date unless renewed by order of the Court.

IMPORTANT

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



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