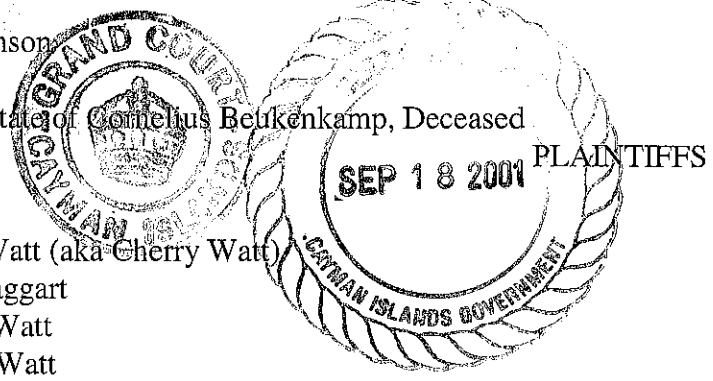


IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO 580 OF 2001

BETWEEN:

Christopher D. Johnson
Jeffrey A. Nason
Executors of the Estate of Cornelius Beukenkamp, Deceased



AND:

- (1) Cheryl Gayle Watt (aka Cherry Watt)
- (2) Christina McTaggart
- (3) Joseph Daniel Watt
- (4) David Samuel Watt
- (5) CIBC Bank & Trust Co (Cayman) Limited
- (6) National Building Society of Cayman
- (7) Cayman Finance Services Ltd.
- (8) Cayman National Bank

DEFENDANTS

WRIT OF SUMMONS

- TO:
- (1) Cherry Gayle Watt, P.O. Box 1870GT, Mount Pleasant, West Bay, Grand Cayman
 - (2) Christina McTaggart, P.O. Box, 1197GT, No. 16, Lakeshore Villas, West Bay
 - (3) Joseph Daniel Watt, c/o Better Properties, 2nd Floor, Regal House, North Church Street, Grand Cayman
 - (4) David Samuel Watt, P.O. Box 1870GT, Mount Pleasant, West Bay, Grand Cayman
 - (5) CIBC Bank & Trust Co. (Cayman) Limited, P.O. Box 694 GT, Edward Street, George Town, Grand Cayman
 - (6) National Building Society of Cayman, P.O. Box 504GT, Unit 5 Capital Life Building, George Town, Grand Cayman
 - (7) Cayman Finance Services Ltd., P.O. Box 31773SMB, Capital Life Building, George Town, Grand Cayman
 - (8) Cayman National Bank Ltd., P.O. Box 1097GT, Cayman National Building, 200 Elgin Avenue, George Town, Grand Cayman

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 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 Plaintiffs may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 17th day of September, 2001.

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 order of the Court.

IMPORTANT

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

INDORSEMENT

AND THE PLAINTIFFS claims:

Against the First Defendant

1. An order that the Plaintiffs be entitled to trace and recover US\$37,200 paid to the First Defendant on or about 1st September, 2000 and/or any assets upon which the said sum or any part thereof has been expended.
2. A declaration that the 1999 Honda Civic Typar motorcar is the property of the Plaintiffs absolutely.
3. An order that the Plaintiffs be entitled to trace and recover the sum of US\$82,000 paid to the First Defendant on or about 5th September 2000 and/or any assets upon which the said sum or any part thereof has been expended.
4. An order that the Plaintiffs be entitled to trace and recover the sum of CI\$25,000 paid to the First Defendant on or about 7th September 2000 and/or any assets upon which the said sum or any part thereof has been expended.
5. An order that the Plaintiffs be entitled to trace and recover the sum of US\$25,000 paid to the First Defendant on or about 11th October, 2000 and/or any assets upon which the said sum or any part thereof has been expended.
6. An order that the Plaintiffs be entitled to trace and recover US\$15,854 paid out of the Estate on 18th October 2000 or alternatively, a declaration that the 1998 Honda Torneo motorcar is the property of the Plaintiffs absolutely.
7. An order that the Plaintiffs be entitled to trace and recover the sum of US\$6,000 paid to the First Defendant on or about 26th July 2000 and/or any assets upon which the said sum or any part thereof has been expended.
8. An order that the Plaintiffs be entitled to trace and recover the sum of US\$6,000 paid to the First Defendant on or about 8th August 2000 and/or any assets upon which the said sum or any part thereof has been expended.
9. An order that the Plaintiffs be entitled to trace and recover the sum of US\$25,122.00 paid to the First Defendant on or about 19th June 2001 and/or any assets upon which the said sum or any part thereof has been expended.
10. An order that the Plaintiffs be entitled to trace and recover the sums of CI\$6,000, CI\$17,600 and US\$3,000 paid to the First Defendant via Cayman Accounting Services

Limited between 5th June 2000 and 16th May 2001 and/or any assets upon which the said sums or any part thereof have been expended.

11. An order that the Plaintiffs be entitled to trace and recover the sum of CI\$85,000 paid to the First Defendant on or about 31st July, 2000 and/or any assets upon which the said sum or any part thereof has been expended.
12. An order that the Plaintiffs be entitled to trace and recover the sums of US\$50,000 and US\$10,000 purportedly paid by the First Defendant to Cayman Finance Services Limited on or about 23rd November 1999 and 1st January 2000 and/or any assets upon which the said sums or any part thereof have been expended.
13. Such tracing and/or proprietary remedies and/or equitable remedies against the First Defendant as constructive trustee as may be just and equitable.
14. Damages and/or equitable compensation for breach of fiduciary duty, including investigation costs.

Against the Second Defendant

15. An order that the Plaintiffs be entitled to trace and recover the sum of US\$41,500 paid to the Second Defendant on or about 7th September 2000 and/or any assets upon which the said sum or any part thereof have been expended.
16. Such tracing and/or proprietary remedies and/or other equitable remedies against the Second Defendant as constructive trustee as are just and equitable.

Against the First and/or Third Defendants

17. An order that the Plaintiffs be entitled to trace and recover the sum of US\$170,000 paid to or for the benefit of the First and/or Third Defendants on or about 8th February 2001 and/or assets upon which the said sum or any part thereof has been expended.
18. Such tracing and/or proprietary remedies and/or other equitable remedies against the First and/or Third Defendants as may be just and equitable and equitable.

Against the Fourth Defendant

19. The sum of US\$3,600 being the purchase price of a car sold and delivered to him by the First Defendant in her capacity as executrix of the Estate of Cornelius Beukenkamp, deceased on or about 7th November 2000.
20. Alternatively, an order that the Plaintiffs be entitled to trace and recover the Mitsubishi Lancer motorcar registration number 83111 and/or proceeds of the sale of the said motorcar.

21. An order that the Plaintiffs be entitled to trace and recover the sum of US\$30,200 paid to the Fourth Defendant on or about 26th July 2000 and/or any assets upon which the said sum or any part thereof has been expended.
22. Such tracing and/or proprietary remedies and/or other equitable remedies against the Fourth Defendant as may be just and equitable

Against all of the First to Fourth Defendants

23. Interest pursuant to statute
24. Costs.

Against the Fifth Defendant

25. An order that the Fifth Defendant do produce to the Plaintiffs attorney all the documents in its possession, custody or control relating to –
 - (a) a bankers draft dated 8th February 2001 issued by Royal Bank of Canada in the sum of US\$170,000 for the credit of "CIBC";
 - (b) account number 1125602;
 - (c) a loan made to Cherry Gayle Watt and/or Joseph Daniel Watt and secured on land at Lower Valley Block 38D Parcel 29;
 - (d) the statements, cheques, advice notes and correspondence which reflect the way in which the said sum of US\$170,000 was applied by the holder of account number 1125602.

Against the Sixth Defendant

26. An order that the Sixth Defendant do produce to the Plaintiffs attorneys all the documents in its possession, custody or control relating to –
 - (a) account numbers 2294620, 287102, 353902, 469402, 52502 and 49002 (to the extent that it has not already done so);
 - (b) account numbers 3104060 and 377102.

Against the Seventh Defendant

27. An order that the Seventh Defendant do produce to the Plaintiffs attorneys all the documents in its possession, custody or control relating to –

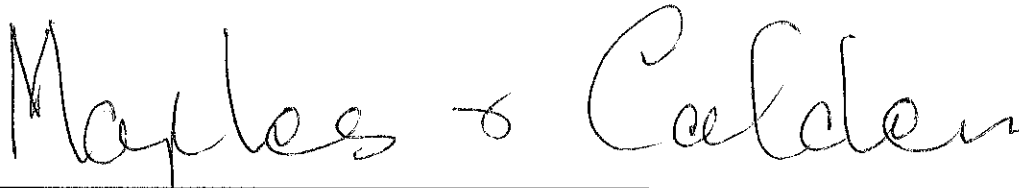
- (a) the loan account established by Dr. Cornelius Beukenkamp on or about 14th July 1997;
- (b) the sum of US\$50,000 transferred from the Sixth Defendant on or about 23rd November 1999;
- (c) the sum of US\$10,000 transferred from the Sixth Defendant on or about 1st January 2000;
- (d) all other transfers made to or from the said loan account on the instructions of the First Defendant from 24th November 1999 to date.

Against the Eighth Defendant

28. An order that the Eighth Defendant do produce to the Plaintiffs attorneys all the documents in its possession, custody or control relating to account number 01526420427-01

Against all the Defendants

29. Such further or other relief as the Court thinks fit.



Maples and Calder

THIS WRIT was issued by Maples and Calder, Attorneys for the Plaintiffs, whose address for service is Ugland House, P.O. Box 309, George Town, Grand Cayman