

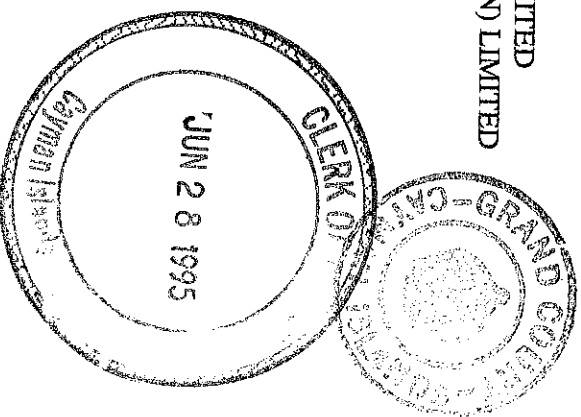
IN THE GRAND COURT OF THE CAYMAN ISLANDS

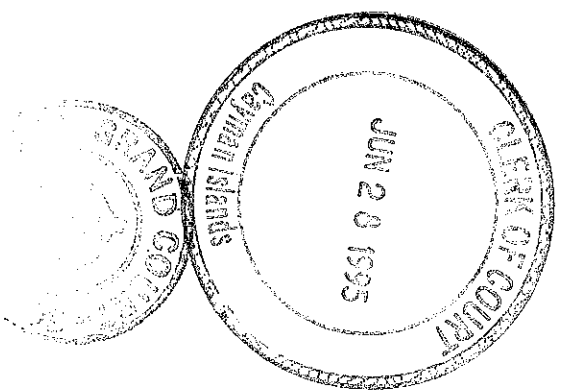
CAUSE NO. 275 OF 1995

BETWEEN: THE ATTORNEY GENERAL OF THE CAYMAN ISLANDS

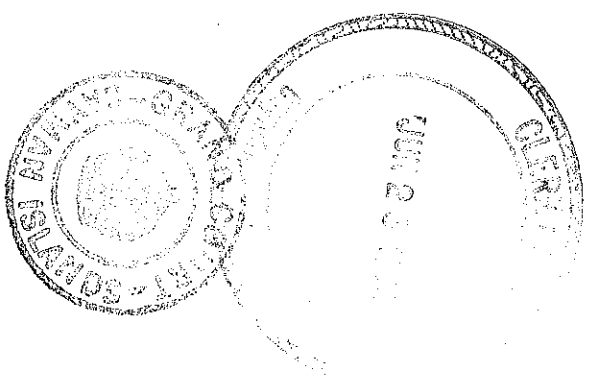
Plaintiff

- AND:
- (1) THE PERSONAL REPRESENTATIVES OF
F. DOUGLAS GIBSON (DECEASED)
 - (2) JOHN WORSLEY
 - (3) AALL TRUST & BANKING CORPORATION LIMITED
 - (4) AALL INVESTMENT MANAGEMENT (CAYMAN) LIMITED
 - (5) AALL GROUP INC.
 - (6) ROBERT SLATTER
 - (7) FRASER MATTHEWS FELL
 - (8) ROBERT MURRAY SUTHERLAND
 - (9) RONALD NEIL ROBERTSON
 - (10) ALEXANDER DESMOND THOMAS GIVENS
 - (11) ROGER DAVID WILSON
 - (12) ROBERT BURTON TUER
 - (13) RONALD JOSEPH ROLLS
 - (14) ROBERT LINDSEY SHIRRIFF
 - (15) JACK WARNICA HUCKLE
 - (16) WILLIAM ANTHONY KELLY
 - (17) KARL JOHN CLAYTON HARRIES
 - (18) DONALD SCOTT AFLECK
 - (19) JOHN HARRISON HOUGH
 - (20) JOHN MICHAEL ROBINSON
 - (21) RICHARD BANN POTTER
 - (22) ALAN MARTIN SCHWARTZ
 - (23) WARD R. PASSI
 - (24) GEORGE CHARLES GLOVER, JR.
 - (25) ROBERT WARD MCDOWELL
 - (26) ALLAN M. ROCK
 - (27) DOUGLAS R. SCOTT
 - (28) RUDOLPH W. GARDNER
 - (29) STEPHEN T. RISK
 - (30) PETER E. BRENT
 - (31) J.A. CAMPION
 - (32) ROBERT W. COSMAN
 - (33) ROBERT S. HARRISON
 - (34) S. BRUCE BLAIN
 - (35) JONATHAN A. LEVIN
 - (36) WILLIAM J. BIES
 - (37) PETER L. ROY
 - (38) JOHN R. VARLEY



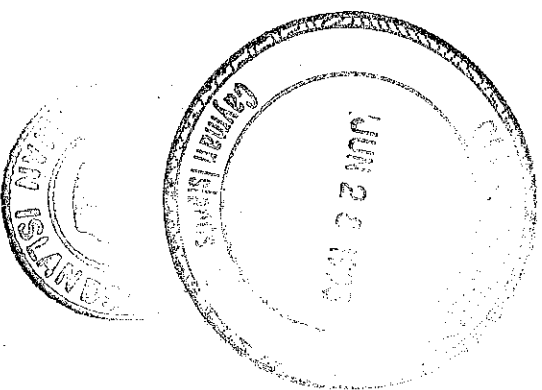


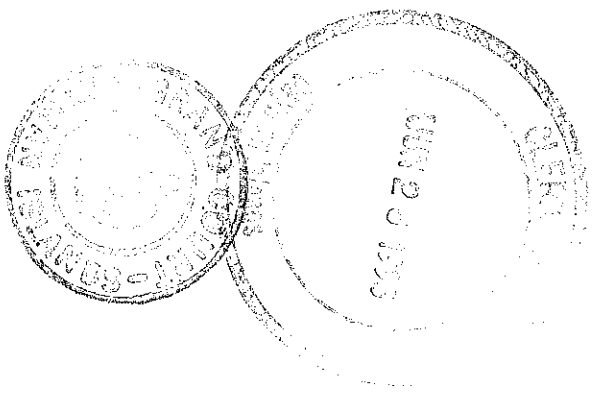
- (5) Aall Group Inc.
Aall Building, North Church Street
P.O. Box 932
George Town, Grand Cayman
- (6) Robert Slatter
c/o Box 932 GT
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West Bay Road
Grand Cayman
- (7) Fraser Matthews Fell
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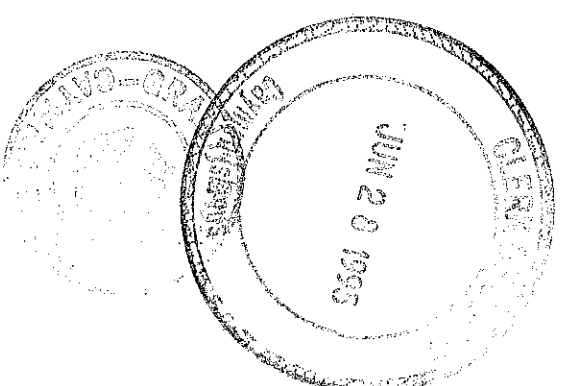


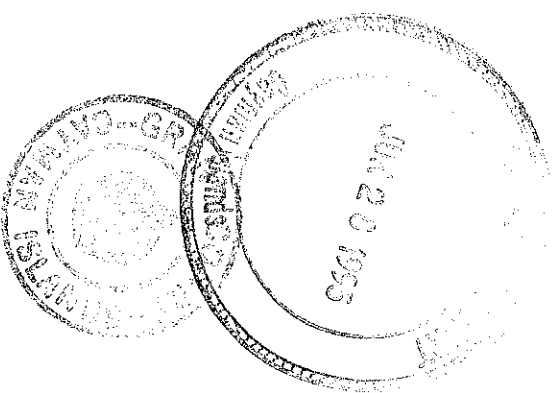
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- (51) Barbara Miller
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- (55) Anthony F. Baldanza
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- (56) Douglas A. Cannon
Toronto Dominion Bank Tower
P.O. Box 20
Toronto, Ontario M5K 1N6
Canada
- (57) Bridge Trust Co. Ltd.
Aall Building, North Church Street
George Town, Grand Cayman

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on page 11.

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 Acknowledge of Service stating therein whether you intend to contest these proceedings.

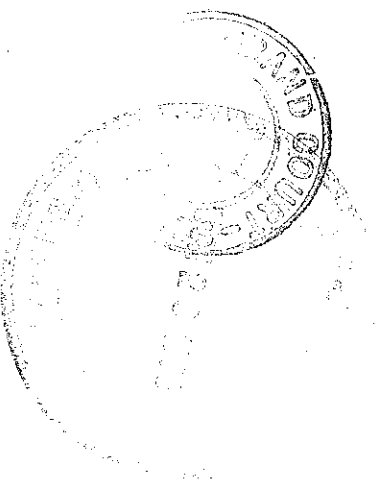
If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 29th day of June, 1995.

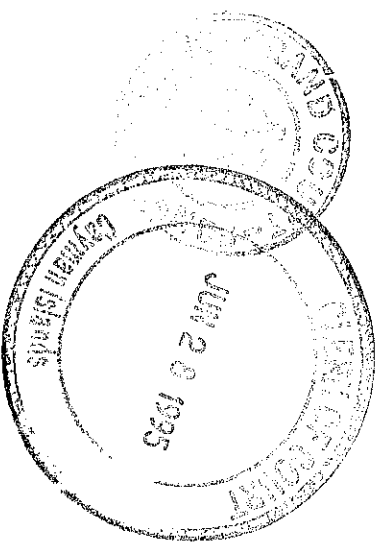
NOTE - This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 months) beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

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



CLAIM



THE PLAINTIFF'S CLAIM is for:

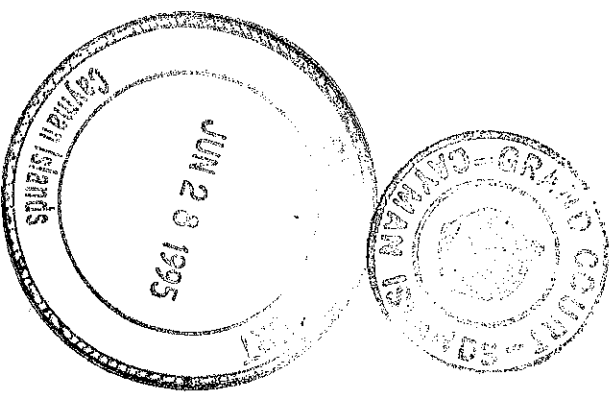
- (1) Against the first, second and sixth to fifty sixth Defendants, an account on the footing of wilful default or otherwise in respect of the payments and dealings set out or referred to in paragraphs 18.3, 23.2(f) and 23.4(c) of the Statement of Claim ("the English Statement of Claim") served by Even Wahr-Hansen in the action brought by him in the Chancery Division of the English High Court of Justice the short reference to the record whereof is CH 1994 W No. 2564;
- (2) Against the third Defendant, an account on the footing of wilful default or otherwise in respect of the payments and dealings set out or referred to in paragraph 23.4(f) of the English Statement of Claim;
- (3) Against all the Defendants, an account on the footing of wilful default or otherwise in respect of the payments and dealings set out or referred to in paragraphs 37 and 38 of the Re-amended Writ served in the said English action and paragraph 23.15 of the English Statement of Claim;
- (4) As against the first and seventh to fifty-sixth Defendants damages for negligence and/or breach of contract (such contract being made with the trustees of the Aall Foundation in or about October, 1982) in failing properly to act and/or advise respect of the above payments and dealings;
- (5) Interest (compounded with yearly rests or otherwise) pursuant to the Court's inherent jurisdiction and/or pursuant to Section 34 of the Judicature Law (Revised).
- (6) All necessary accounts and inquiries;
- (7) Further or other relief.
- (8) Costs.

No relief is sought against the fifty seventh Defendant who is joined as one of the trustees of the Aall Foundation.

The Attorney General sues on behalf of the Crown as parens patriae representing the interests of charity and the charitable objects of the Aall Foundation.

Wm Helfrecht

William Helfrecht, Crown Counsel



This Writ was issued by William Helfrecht, Crown Counsel, on behalf of the Attorney General whose address for service is care of the Government Legal Department, Tower Building, George Town, Grand Cayman.