

IN THE GRAND COURT OF THE CAYMAN ISLANDS

436
CAUSE NO. of 2002

BETWEEN: LUIS ROBERTO DEMARCO ALMEIDA Plaintiff
(A Minority Shareholder suing derivatively on behalf of the First Defendant)

AND: (1) CVC/OPPORTUNITY EQUITY PARTNERS, LTD
(2) CITIBANK N.A.
(2) INTERNATIONAL EQUITY INVESTMENTS, INC. Defendants

WRIT OF SUMMONS

TO: (1) CVC/Opportunity Equity Partners, Ltd.
c/o Maples and Calder
Ugland House
South Church Street
George Town, Grand Cayman
(2) Citibank N.A.
c/o Cititrust (Cayman) Limited
CIBC Financial Centre
Dr Roys Drive
George Town, Grand Cayman
(3) International Equity Investments, Inc.
c/o Citibank N.A.
399 Park Avenue
New York, NY, USA



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

Within 14 days after the serve 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 Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement 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 24th day of June 2002

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.

THE PLAINTIFFS' CLAIM IS FOR:

- (1) A Declaration that the Second and Third Defendants are not entitled, whether by themselves, their servants or agents or otherwise howsoever, in any way howsoever to replace, or cause or permit the replacement of, or to take any steps leading to the replacement of, CVC/Opportunity Equity Partners Ltd as general partner of CVC/Opportunity Equity Partners L.P. with any entity or individual owned or controlled by, or associated or affiliated with, Daniel Dantas or the group of companies known as the "Opportunity Group" (the "Unlawful Scheme").
- (2) An injunction to restrain the Second and Third Defendants and each of them by themselves or by their agents or servants or otherwise howsoever from implementing

the Unlawful Scheme in any way howsoever;

- (3) An indemnity from the assets of the First Defendant for all costs and expenses reasonably incurred in pursuing the derivative claim herein on behalf of the First Defendant;
- (4) Taxed Costs.

LSa Heem

Walkers

Attorneys-At-Law for the Plaintiff

THIS WRIT was issued by Walkers, Attorneys-At-Law for the Plaintiff herein, whose address for service is that of his said Attorneys-At-Law, Walker House, P.O. Box 265, George Town, Grand Cayman, Cayman Islands.