

IN THE GRAND COURT OF THE CAYMAN ISLANDS

569
CAUSE NO. OF 2002

BETWEEN:

- (1) BANKAMERICA INVESTMENT CORPORATION
- (2) BLUE RIDGE INVESTMENTS, LLC

PLAINTIFFS

AND

- (1) ALDO FLORIS
- (2) LILY RIVER INVESTMENTS LTD
- (3) SWEET RIVER INVESTMENTS LTD

DEFENDANTS

WRIT

TO: Aldo Floris of Praia de Botafogo, 228/601 Botafogo Rio de Janeiro, RJ-22 359
900 Brazil

TO: Lily River Investments Ltd – Uglan House P.O. Box 309 George Town Cayman
Islands British West Indies

TO: Sweet Investments Ltd – Uglan House P.O. Box 309 George Town Cayman
Islands British West Indies

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs
in respect of the claim set out on the subsequent pages.

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

ISSUED this day of 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:

- (i) A declaration that on the true construction of the Articles of Association of the Second and Third Defendants and in the events which have happened the First Defendant was validly removed from office as a director of both the Second and Third Defendants at the Extraordinary General Meetings of the Second and Third Defendants held on 15 July 2002.

- (ii) A declaration that the said removal was valid and lawful notwithstanding the letter dated 4 April 2001 between Bank of America Corporation, Bank of America – Liberal S.A. (Banco Multiplo), LFS - Liberal Financial Services E Participacoes LTDA, Aldo Floris, Antonio Carlos Lemgruber and Lauro Alberto de Luca.

(iii) Costs.

Walkers
WALKERS

FILED by Walkers, attorneys-at-law for the First and Second Plaintiffs, whose address for service is that of its said attorneys, P. O. Box 265, Walker House, Mary Street, George Town, Grand Cayman, Cayman Islands.