

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE No ⁹⁰⁹ OF 2002

In the Matter of the Trust Agreement dated 15th September, 1986 between Juan Riera Gubua and Manufacturers Hanover International Trust Company Limited (Cayman)

And in the Matter of the Trusts Law (2001 Revision)

EX PARTE ORIGINATING SUMMONS



LET ALL PARTIES attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the ^{21st March 3} day of December 2002, at 2:30 o'clock, on the hearing of an application by Chase Manhattan Trust (Cayman) Limited (the "Trustee"), P.O. Box 190GT, George Town, Grand Cayman as Trustee of the above mentioned trust agreement by which the Trustee seeks the following relief under section 48 of the Trusts Law (2001 Revision) and/or the inherent jurisdiction of the Court:

1. Such directions as this Honourable Court shall think fit and may be given as to:
 - (i) what further steps, if any, the Trustee may properly take in respect of proceedings commenced in the Court of First Instance, Santa Coloma de Farners, Catalonia, Spain entitled Jose Riera Casadevall v. The Chase Manhattan Bank C.M.B., The Chase Manhattan Trust (Cayman) Limited and six others;
 - (ii) whether, if so advised, the Trustee should contest the jurisdiction of the said Court of First Instance or otherwise defend at the expense of the trust fund subject to the trust of the trust agreement (the "trust fund");
 - (iii) the rights of indemnity of the Trustee in respect of costs, expenses or liabilities incurred by the Trustee since 17th day of May, 2002 or hereafter to be incurred by the Trustee in the said proceedings and in respect of the management or

administration of the trust fund or protection of assets of the trust fund and how such costs and expenses should be borne;

- (iv) whether any, and if so, which persons should be joined as a party or parties to be served with notice of this application;
 - (v) what, if any, representation orders or orders for the appointment of a guardian ad litem should be made.
2. That all further and necessary directions may be given.
 3. That provision be made for the cost of this application.
 4. Such further and/or other relief as the Court deems appropriate.

Dated the 12th day of December, 2002.


 Maples and Calder

TIME ESTIMATE: The estimated length of the hearing of this summons is half a day.

To: The Attorney General of the Cayman Islands
 Attorney General's Chambers
 The Government Administration Building
 George Town
 Grand Cayman

And to: The Clerk of the Court

This Ex Parte Originating Summons was issued by Maples and Calder, Attorneys-at-Law for the Applicants, whose address for service is Ugland House, PO Box 309GT, George Town, Grand Cayman (Ref: NRT/600717-01).