

IN THE GRAND COURT OF THE CAYMAN ISLANDS

604
CAUSE NO. OF 2003

IN THE MATTER of the Deed of Settlement made on 8th December 1992 between Albany Investment Inc., ("the Settlor") and David Upton Tugman, George Spyros Giannatos, George John Mavros, David Aaron Landau and John Ernest Bryan Scanlan ("the Original Trustees"), (known as the Albany Investment Inc. No. 3 Settlement)

AND in the matter of the Trusts Law (2001 Revision)



EX PARTE ORIGINATING SUMMONS



LET INTERNATIONAL ENERGY DEVELOPMENT CORPORATION ("the Applicant") attend before a Judge in Chambers at the Law Court, George Town, Grand Cayman on the day of 2003 at a.m./p.m. for the hearing of an application by the Applicant for Orders that:

1. The Applicant be at liberty to apply to be joined in the action in the Grand Court of the Cayman Islands, Cause No. 87 of 2003 between Napoleon Investments Inc., Farouk Abdulla, Princess Coralia Ghertsos-Pignatelli, Plaintiffs v. Nicholas Antoine Pappadakis, Anthony Nicholas Pappadakis, George Pappadakis (A Minor) and Virginia Alexandra Pappadakis (A Minor), Defendants and to apply for orders in terms of the draft proposed Summons appended hereto ("the Proposed Summons").
2. The Applicant may be indemnified against any costs of the Proposed Summons, including costs incurred by the Applicant and any adverse costs order against the Applicant by the estate of the Albany Investment Inc. No. 3 Settlement.
3. Such further or other relief as to this Honorable Court may seem just and expedient.

4. That the Applicant be indemnified for the costs of and incidental to this application from the estate of the Albany Investments Inc No. 3 Settlement.

DATED this 16th day of September 2003

Campbells
CAMPBELLS
ATTORNEYS FOR THE APPLICANT

This Ex-Parte Originating Summons was issued by Campbells, Attorneys-At-Law for the Applicant of Monrovia, Liberia, whose address for service is that of its Attorneys-At-Law, Fourth Floor, Scotiabank Building, P.O. Box 884GT, George Town, Grand Cayman, Cayman Islands, B.W.I. (ref: JRM)

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CAUSE NO. 87 OF 2003

IN THE MATTER of the Deed of Settlement made on 8th December 1992 between Albany Investment Inc., (“the Settlor”) and David Upton Tugman, George Spyros Giannatos, George John Mavros, David Aaron Landau and John Ernest Bryan Scanlan (“the Original Trustees”), (known as the Albany Investment Inc. No. 3 Settlement)

AND in the matter of the Trusts Law (2001 Revision)

AND in the matter of the Grand Court Rules Order 85 rule 2

BETWEEN: (1) **NAPOLEON INVESTMENTS INC.**
(2) **FAROUK ABDULLA**
(3) **PRINCESS CORALIA GHERTSOS-PIGNATELLI**

PLAINTIFFS

and

(1) **NICHOLAS ANTOINE PAPPADAKIS**
(2) **ANTHONY NICHOLAS PAPPADAKIS**
(3) **GEORGE PAPPADAKIS (a minor)**
(4) **VIRGINIA ALEXANDRA PAPPADAKIS (a minor)**

DEFENDANTS

DRAFT SUMMONS

LET ALL PARTIES concerned attend before a Judge in Chambers at the Law Courts, George Town, Grand Cayman on the day of , 2003 at a.m. for the hearing of an application on the part of International Energy Development Corporation (“IEDC”) for the following Orders:

1. That IEDC be joined as a Defendant to this action.
2. For directions as to whether IEDC, as protector of the Albany Investment Inc. No. 3 Settlement (“the Trust”) should, or should not, exercise its power under Clause 27 of the Deed of Settlement of the Trust to remove the Plaintiffs and the First Defendant as Trustees of the Trust.
3. In the event that IEDC is directed to exercise its power under Clause 27 of the Deed of Settlement of the Trust to remove the Plaintiffs and the First Defendant of Trustee of the Trust, that Rothchild Trust (Cayman) Limited be appointed as Trustee of the Trust.
4. Such further or other relief as to this Honourable Court may seem just and expedient.
5. That IEDC be indemnified in respect of the costs of this Summons including any adverse cost order made against IEDC by the estate of the Trust.

DATED: September 2003

CAMPBELLS
Attorneys at Law for IEDC

TIME ESTIMATE: minutes

TO: The Plaintiffs
c/o Charles Adams, Ritchie & Duckworth

AND TO: The First Defendant
c/o Maples & Calder

AND TO: The Second Defendant
c/o Hunter & Hunter

AND TO: The Third & Fourth Defendants
c/o Boxalls

AND TO: The Clerk of the Court

THIS SUMMONS was filed by Campbells, Attorneys at Law for the IEDC, whose address for service is 4th Floor, Scotiabank Building, George Town, Grand Cayman, Tel: 949 2648/Fax: 949 8613 (Ref: JRM/10636)