

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 475 OF 2004

BETWEEN:

BARCLAYS PRIVATE BANK & TRUST (CAYMAN) LIMITED

PLAINTIFF

– and –

- (1) BENN THOMAS CHAMBERLAIN
- (2) FLEUR ELIZABETH CHAMBERLAIN
- (3) ALDERLEY HOLDINGS LIMITED

DEFENDANTS

**ORIGINATING SUMMONS**

**TO:** BENN THOMAS CHAMBERLAIN of Crocketts Manor, Beaudesert Park, Henley-in-Arden, West Midlands B95 5QB;

**AND TO:** FLEUR ELIZABETH CHAMBERLAIN of Crocketts Manor, Beaudesert Park, Henley-in-Arden, West Midlands B95 5QB;

**AND TO:** ALDERLEY HOLDINGS LIMITED of Palm Grove House, PO Box 438, Road Town, Tortola, British Virgin Islands (“Alderley”).

**LET THE DEFENDANTS,** within 14 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, P.O. Box 495G, George Town, Grand Cayman. Cayman Islands

**BY THIS SUMMONS,** which is issued on the application of Barclays Private Bank & Trust (Cayman) Limited of 25 Main Street, George Town Grand Cayman, Cayman Islands, BWI, the Plaintiff seeks the following relief against the Defendants, namely an Order and Declaration that: -

1. The sum of £750,000 that Alderley paid to and was accepted by Aiglon Trustees (BVI) Limited (later known as Barclays Private Trust (BVI) Limited) (“the Trustee”) pursuant to resolutions dated 23 May 2000 relating to the repayment of the sum

of £750,000 from Alderley to the Trustee was not validly lent to the Trustee or borrowed by the Trustee;

2. Any such loan is null and void ab initio so that such sum continued to be the property of Alderley;
3. All necessary representation orders;
4. Such further or other relief as may be appropriate; and
5. The costs of this application be provided for.

If the Defendants do not acknowledge service, such judgment may be given or Order made against or in relation to the Defendants as the Court may think just and expedient.

DATED the 2nd day of December 2004.



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**WALKERS**  
Attorneys-at-Law for the Plaintiff

NOTE - This Summons 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 that date unless renewed by order of the Court.

**IMPORTANT**

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

This Originating Summons is filed by Walkers, Attorneys-at-Law, Walker House, Mary Street, P.O. Box 265 GT, George Town, Grand Cayman, for the Plaintiff whose address for service is care of its said Attorneys-at-Law.