

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 476 OF 2005

BETWEEN:

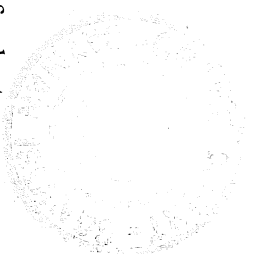
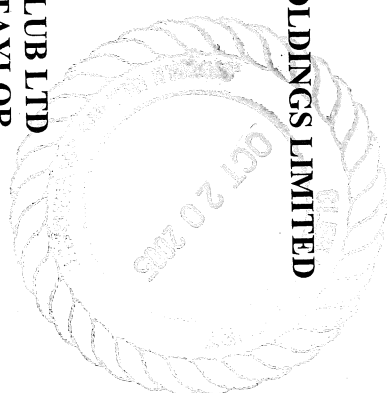
WILLOW MILLENNIUM HOLDINGS LIMITED

Plaintiff

-and-

- (1) CAYMAN YACHT CLUB LTD
- (2) ANTHONY HADEN-TAYLOR
- (3) FORESHORE CORPORATE SERVICES LTD

Defendant



NOTICE OF ORIGINATING MOTION

TAKE NOTICE that the Court at the Law Courts, George Town, Grand Cayman will be moved on _____ at _____ o'clock in the _____ noon, or soon thereafter as counsel can be heard, by counsel on behalf of the Plaintiff for the following orders and declarations.

- 1 That the Plaintiff is the legal owner of all of the issued share capital of the First Defendant;
- 2 That the Clerk of the Court be appointed as an Equitable Receiver over the issued shares of the First Defendant currently registered in the name of the Second Defendant;
- 3 That the Clerk of the Court be authorised to enter the Plaintiff's name as the registered owner of the issued shares of the First Defendant, and to amend the Register of Members to record this;
- 4 That the Third Defendant do comply with any requests of the Clerk of the Court in relation to this Order;

- 5 Such further order or relief as this Honourable Court may think fit;
6 That the costs of this application be provided for.

AND FURTHER TAKE NOTICE that the grounds of this application are set out in the affidavit of Keith Laker dated 19th October 2005

Dated this 20th day of October 2005

Maples and Calder

Maples and Calder

TO: The Clerk of the Court
AND TO: Cayman Yacht Club Ltd and Dr Anthony Haden-Taylor
c/o Foreshore Corporate Services Ltd

AND TO: Foreshore Corporate Services Ltd
PO Box 1994GT
4th Floor, Queensgate Building
113 South Church Street
George Town
Grand Cayman