

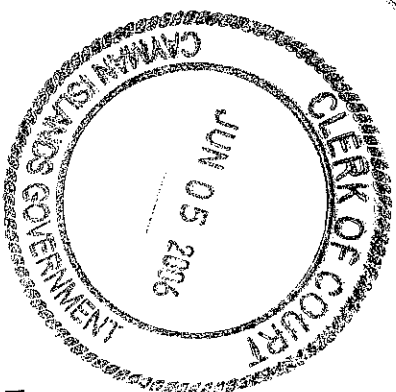


IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 211 OF 2006

BETWEEN:

- (1) UNILEVER PLC
- (2) UNILEVER NV
- (3) MOLSON INC
- (4) JOHNSONDIVERSEY HOLDINGS INC
- (5) JOHNSONDIVERSEY INC
- (6) JOHNSONDIVERSEY UK LIMITED
- (7) JOHNSONDIVERSEY GULF FZE



PLAINTIFFS

AND:

- (1) ABC INTERNATIONAL

DEFENDANT

WRIT OF SUMMONS

TO: **ABC INTERNATIONAL**
 c/o Appleby Corporate Services
 Clifton House
 75 Fort Street
 PO Box 1350 GT
 Grand Cayman

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

Within [14 days] after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495 GT, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this day of 2006.

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.

STATEMENT OF CLAIM

THE PLAINTIFFS' CLAIM IS FOR:

1. A declaration that the Plaintiffs are not party or privy to and/or are not bound by an agreement dated 1 April 1988 between Diversey Limited and the Defendant ("the Agreement") and are therefore not bound by any of the terms of the Agreement, nor bound to submit to arbitration under Article 11 of the Agreement.
2. An injunction restraining the Defendant from further proceeding with the reference to arbitration pursuant to a Request for Arbitration dated 14 June 2004 or from otherwise proceeding against the Plaintiffs or any of them by way of reference to arbitration in any dispute identical or colourably similar to the subject matter of the said Request for Arbitration.
3. Costs.
4. Such further or other orders as this honourable Court thinks fit.


WALKERS
Attorneys at law for the Plaintiffs

THIS WRIT was issued by Walkers whose address for service is Walker House, 87 Mary Street, PO Box 265 GT, George Town, Grand Cayman, Cayman Islands.