



IN THE GRAND COURT OF THE CAYMAN ISLANDS

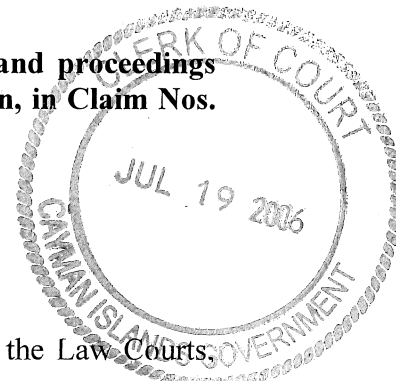
CAUSE NO. 306 of 2006

IN THE MATTER of The Confidential Relationships (Preservation) Law (1995 Revision)

AND IN THE MATTER of Merrill Lynch Bank and Trust Company (Cayman) Limited and Fiduciary Services Limited and proceedings before the Grand Court of the Cayman Islands, Cause No: 555 of 2005

AND IN THE MATTER of Merrill Lynch International Bank Limited and proceedings before the High Court of Justice of England and Wales, Chancery Division, in Claim Nos. HC05C03744 and HC05C03745

EX PARTE ORIGINATING SUMMONS



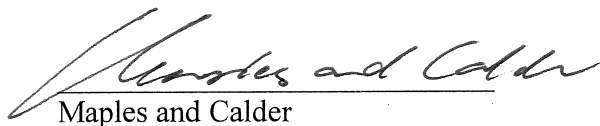
LET ALL PARTIES CONCERNED attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the day of 2006 at am/pm on the hearing of an application by Merrill Lynch Bank and Trust Company (Cayman) Limited, as Trustee of The Dolphin Trust and The Mana Trust (the "Trusts"), Fiduciary Services Limited, as Sole Director of Kaffee Limited, Barla Finance Limited, Cunur Cash Limited and Medro Limited (the "Companies"), each of P.O. Box 1164GT, George Town, Grand Cayman, Cayman Islands, British West Indies, and Merrill Lynch International Bank Limited, whose registered office is at Merrill Lynch Financial Centre, 2 King Edward Street, London, EC1A 1HQ, United Kingdom, (Merrill Lynch Bank and Trust Company (Cayman) Limited, Fiduciary Services Limited and Merrill Lynch International Bank Limited together, the "Applicants") for directions pursuant to Section 4 of the Confidential Relationships (Preservation) Law (1995 Revision).

Merrill Lynch Bank and Trust Company (Cayman) Limited and the Companies, each being Defendants in proceedings under Cause No.555 of 2006 (the "Cayman Proceedings") and Merrill Lynch International Bank Limited being a Defendant under Claim No. HC05C03744 and Claim No. HC05C03745 in the High Court of Justice of England and Wales, Chancery Division (the "English Proceedings") are now, and/or will in the future be, required and intend to give in evidence, in the Cayman and English Proceedings as applicable, confidential information that may relate or be subject to the Trusts, Companies, Yahya Murat Demirel and/or Ayse Nur

Esenler by means of providing or producing lists of documents, affidavits, written statements, oral testimony and documents for inspection and seek the following orders and directions that;

1. The Applicants be permitted to disclose any confidential information in evidence in the Cayman and English Proceedings as applicable, by means of;
 - a. the production of information or documents pursuant to any applicable request or order;
 - b. any affidavit or witness statement served by or on behalf of any of the Applicants; and
 - c. any oral testimony given by or on behalf of any of the Applicants.
2. Such directions as to service of the Notice of the Summons herein as the Court shall think fit.
3. Such further or other directions and orders as the Court shall think fit.

DATED this 19th day of July 2006


Maples and Calder

TO: The Clerk of the Court

AND TO: The Honourable Attorney General
Government Administration Building
George Town
Grand Cayman

TIME ESTIMATE: The estimated length of the hearing of this summons is 1 hour.