

IN THE GRAND COURT OF THE CAYMAN ISLANDS

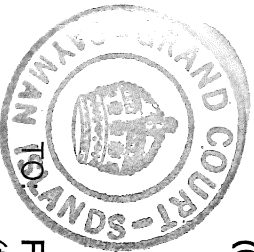
CAUSE NO. 910 OF 2006

BETWEEN: DEBTWORKS INC.

PLAINTIFF

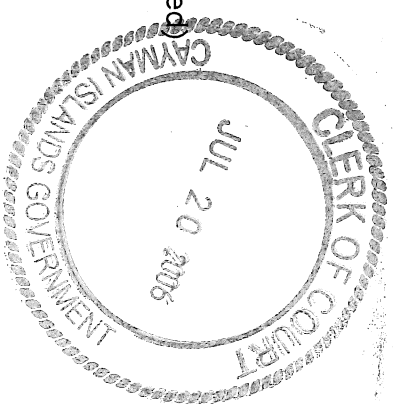
AND: FIRST CARIBBEAN INTERNATIONAL BANK (CAYMAN) LTD.  
(FORMERLY CIBC BANK AND TRUST COMPANY  
(CAYMAN) LIMITED)

DEFENDANT



WRIT OF SUMMONS

FIRST CARIBBEAN INTERNATIONAL BANK (CAYMAN) LTD.  
(formerly CIBC Bank and Trust Company (Cayman) Limited)  
P.O. Box 695GT,  
George Town,  
Grand Cayman



THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claims 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, P.O. Box 495G, George Town, Grand Cayman, the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, of if you return the Acknowledgement 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 19<sup>th</sup> day of July, 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 the order of the Court.

**IMPORTANT**

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


**INDORSEMENT**

The Plaintiff's claim for relief against the Defendant arises out of and/or is connected with the receipt by the Defendant of certain funds which were transferred from DebtWorks Inc., its affiliates and subsidiaries and/or Andris Pukke his agents or assigns to account number 1000146 at CIBC Bank and Trust Company (Cayman) Limited (now FirstCaribbean International Bank (Cayman) Limited) in favour of Seaspray Holdings Ltd. and/or account number 1000147 at the Defendant Bank in favour of Reinsurance Syndicate 99 LLC, or such other account/s held in favour of DebtWorks Inc., its affiliates and subsidiaries and/or Mr. Andris Pukke, or over which DebtWorks Inc., it affiliates and subsidiaries and/or Mr. Andris Pukke his agents or assigns exercised control or authority, for the benefit of Debtworks Inc., its affiliates and subsidiaries and which funds are derived from transfers made from the Plaintiff's accounts.

**AND THE PLAINTIFF CLAIMS** against the Defendant:

- (1) A declaration that in respect of the Plaintiff's monies paid to the Defendant :
  - (i) the Plaintiff is entitled to trace such monies and/or the proceeds thereof and/or any assets upon which the said sums or any part thereof have been expended;
  - (ii) such sum and/or the proceeds thereof and/or any assets upon which the said sums or any part thereof have been expended are in equity the property of the Plaintiff;

- (iii) such sum and/or the proceeds thereof and/or any assets upon which the said sums, or any part thereof, have been expended, are held by the Defendant on trust for the Plaintiff;
- (2) Such tracing and/or discovery and/or injunctive and/or other equitable or other relief as this Honourable Court deems just.
- (3) Interest on all sums found due to the Plaintiff pursuant to Section 34 of the Judicature Law (1995 Revision) and the rules made thereunder at such rate and for such period as this Honourable Court thinks just and/or in equity.
- (4) Costs.

  
Charles Adams, Ritchie & Duckworth  
Attorneys-at-Law for the Plaintiff

THIS WRIT was issued by Charles Adams, Ritchie & Duckworth, Attorneys-at-Law, for and on behalf of the Plaintiff herein, whose address for service is that of its said Attorneys-at-Law, P.O. Box 709G, Zephyr House, Mary Street, George Town, Grand Cayman, B.W.I.