

IN THE GRAND COURT OF THE CAYMAN ISLANDS

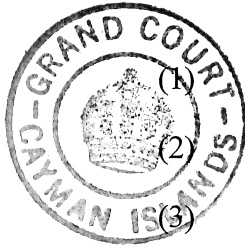
174/07
CAUSE NO. OF 2007

In the Matter of The Companies Law (2004 Revision)

And in the Matter of Intercontinental Diversified Corp

And in the Matter of Fiduciary Management Services Limited

BETWEEN:



(1) Intercontinental Diversified Corporation
(2) Fiduciary Management Services Limited
(3) Sir Jack Hayward



AND

- (1) Lady Henrietta St George, James Fitzroy, Earl of Euston, Christopher Cafferata (as the joint executors of the estate of the late Edward St George)
- (2) Lady Henrietta St. George (in her personal capacity)
- (3) Seashell Investments Limited (a company registered under the laws of the British Virgin Islands)
- (4) Campbell Secretaries Limited
- (5) Frobisher Investments Limited (a company registered under the laws of the British Virgin Islands)
- (6) Donald de la Rue

Defendants

WRIT OF SUMMONS

TO: Lady Henrietta St George, James Fitzroy, Earl of Euston, Christopher Cafferata (as the Joint Executors of the Estate of the late Edward St George), City of Freeport, Grand Bahama, Commonwealth of the Bahamas;

AND TO: Lady Henrietta St. George (in her personal capacity), Spanish Main Drive,
City of Freeport, Grand Bahama, Commonwealth of the Bahamas;

AND TO: Seashell Investments Limited (a company registered under the laws of the
British Virgin Islands);

AND TO: Campbell Secretaries Limited, Campbells Corporate Services Ltd.,
Scotiabank Building, George Town, Grand Cayman;

AND TO: Frobisher Investments Limited (a company registered under the laws of
the British Virgin Islands)

AND TO: Donald de la Rue, City of Freeport, Grand Bahama, Commonwealth of the
Bahamas

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 *28 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 11th day of April, 2007.

NOTE – This Writ may not be served later than 6 calendar 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.

Brief details of claim:

The Plaintiffs claim is for declarations that they have acted with due and proper authority *vis a vis* their Members or nominees; properly held meetings of Members and Directors, and/or properly executed written resolutions and that the said written resolutions and/or resolutions passed at the said meetings are valid and binding.

The Plaintiffs now hereby seek declarations as follows:

Intercontinental Diversified Corporation ("IDC") Resolutions

1. That the First Plaintiff is (pursuant to its Articles and The Companies Law) obliged only to recognize and can only have regard to the wishes/instructions of the registered holders of its shares (its Registered Members) as the absolute legal and beneficial owner(s) thereof;
2. That the Members' resolutions of the First Plaintiff dated 6 February 2007 are valid and binding;
3. That the Members' resolutions of the First Plaintiff dated 20 March 2007 are valid and binding;

Fiduciary Management Services Limited ("FMS") Meetings and/or Resolutions

4. That the Second Plaintiff is (pursuant to its Articles and The Companies Law) obliged to only recognize and have regard to the wishes/instructions of the registered holders of its shares (its Registered Members) as the absolute legal and beneficial owner(s) thereof
5. That the Annual General Meeting of the Second Plaintiff held on 6 February 2007 was duly convened and validly held;
6. That the resolutions passed at the Annual General Meeting of the Second Plaintiff held on 6 February 2007 are valid and binding;

7. That the directors' meeting in the Second Plaintiff held on 6 February 2007 was duly convened and validly held and that the resolutions passed at the said directors' meeting are valid and binding;
8. That the directors' meeting in the Second Plaintiff held on 20 March 2007 was duly convened and validly held and that the resolutions passed at the said directors' meeting are valid and binding;

Entitlement to Vote

9. That the First Defendant (or the person elected by the First Defendant as potential transferee of the shares registered in the name of Edward St George) is not entitled to vote at general meetings of the Second Plaintiff unless and until the First Plaintiff (or the person elected by the First Defendant as potential transferee of the shares registered in the name of Edward St George) becomes registered as a Member of the Second Plaintiff;

Votes of the Fourth Defendant

10. That the Third Plaintiff is the beneficial owner of the 1 share in the Second Plaintiff currently held by (registered in the name of) the Fourth Defendant as his nominee and the Fourth Defendant has validly voted and may in future validly vote the said one share, and/or executed/execute written resolutions of the Second Plaintiff, upon the instructions of its nominator, the Third Plaintiff.



Bodden & Bodden
Attorneys for the Plaintiffs

**DIRECTIONS FOR ACKNOWLEDGMENT OF
SERVICE OF ORIGINATING SUMMONS**

The accompanying form of Acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person. After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. If you wish to defend claims made in the Originating Summons, or intend to attend the proceedings and to participate in them so far as necessary (although not necessarily in an adversarial manner) you should tick the "Yes" box in paragraph 2 of the Acknowledgment of Service.
3. For the purpose of calculating the period of 28 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
4. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (*the name stated on the Originating Summons*)".
5. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of _____" after his name.
6. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as _____" after his name.
7. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
8. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
9. A Defendant acting in person may obtain help in completing the form at the Courts Office.

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- (4) Campbell Secretaries Limited
- (5) Frobisher Investments Limited (a company registered under the laws of the British Virgin Islands)
- (5) Donald de la Rue

Defendants

**ACKNOWLEDGMENT OF SERVICE
OF ORIGINATING SUMMONS**

If you intend to instruct an Attorney to act for you, give him this form IMMEDIATELY.

Important: Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

1. State the full name of the Defendant by whom or on whose behalf the service of the Originating Summons is being acknowledged.

2. State whether the Defendant intends to contest or otherwise participate in the proceedings (*tick appropriate box*).

yes

no

Service of the Originating Summons is acknowledged accordingly.

Attorney for the Defendant

Address for service:

Notes on address for service:

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

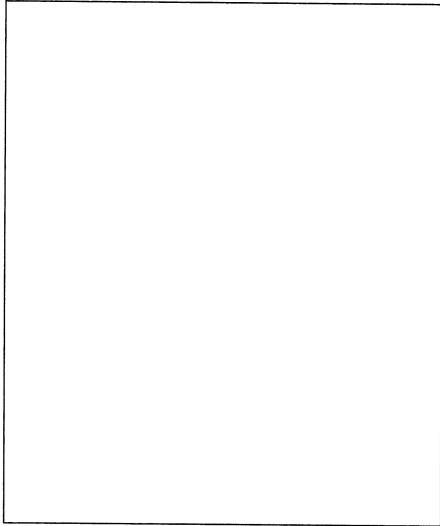
Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communications for him should be sent. In the case of a limited company, "residence" means its registered principal office.

Indorsement by Plaintiff's Attorney (or by Plaintiff is suing in person) of his name, address and reference, if any, in the box below.

Bodden & Bodden Attorneys PO Box 10335 Grand Pavilion Commercial Centre 802 West Bay Road Grand Cayman, Cayman Islands

(Reference:1042-0001/JCC)

Indorsement by Defendant's Attorney (or by Defendant is suing in person) of his name, address and reference, if any, in the box below.

A large, empty rectangular box with a thin black border, intended for the indorsement by the defendant's attorney or the defendant in person. The box is currently blank.