

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 587 OF 1996

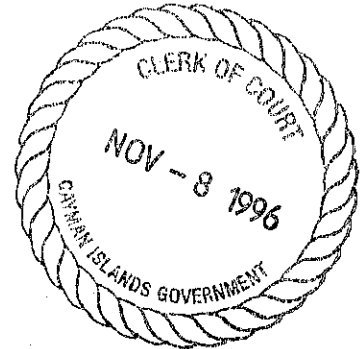
BETWEEN: AGUILAR & SEBASTIANELLI PLAINTIFF
(a professional law corporation organised
and existing under the laws of the State of
California)

AND (1) DAVID M. L. ROBERTS DEFENDANTS
(2) INTERNATIONAL UNDERWRITING
MANAGERS (CAYMAN) LIMITED

WRIT OF SUMMONS

TO: David M.L. Roberts
Box 1569GT
Turtle Farm Road
West Bay, Grand Cayman

AND TO: International Underwriting Managers (Cayman) Limited
P.O. Box 1569GT
2nd Floor, Genesis Building
George Town, Grand Cayman



THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff 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, P.O. Box 495G, 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.

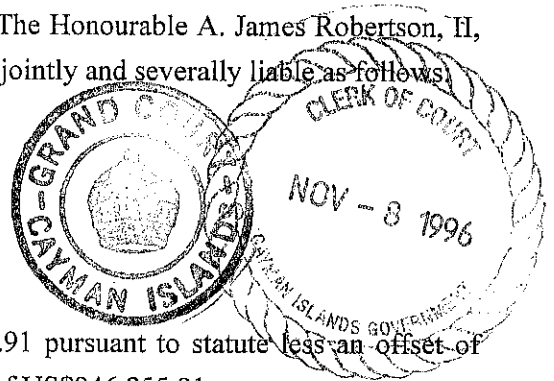
Issued this 8th day of November, 1996.

IMPORTANT

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

STATEMENT OF CLAIM

1. The Plaintiff was at all material times the Plaintiff in an action in the Superior Court of the State of California for the County of San Francisco, Cause No. 954827 ("the Foreign Action").
2. The Defendants were at all material times Defendants in the Foreign Action. In the said Foreign Action, the Plaintiff claimed, inter alia, for compensatory damages with interest, for unpaid attorneys fees, for statutory penalties provided by the relevant foreign law, for punitive and exemplary damages, for costs and expenses incurred and for damages for injury to reputation and standing in the legal community.
3. The Foreign Action came on regularly for trial on September 26, 1995 at 10:00 a.m. before The Honourable A. James Robertson, II, a Judge of the Superior Court of the State of California for the County of San Francisco. The Defendants appeared at the aforesaid trial by their counsel, Howard Hibbard, Esq. and by Joseph Hoffman of Weinberg, Hoffman & Casey. It is averred that by actively contesting these proceedings to trial the Defendants submitted to the jurisdiction of the Superior Court of the State of California for the County of San Francisco.
4. By the Judgment and revised Statement of Decision of The Honourable A. James Robertson, II, ("the Foreign Judgment") the Court held the Defendants jointly and severally liable as follows:
 - (a) base damages of US\$343,900.28;
 - (b) interest of US\$55,051.69;
 - (c) that such damages be trebled to US\$1,196,855.91 pursuant to statute less an offset of US\$250,000.00 being a total award of damages of US\$946,855.91.
5. Notice of entry of the Foreign Judgment was filed at the Foreign Court on 22nd December 1995 and was served by mail in the ordinary course of business on the Defendants' attorneys.
6. In the premise, the Foreign Judgment, being a common final and conclusive judgment evidences the existence of a common law debt, such amount remaining due and owing from the Defendants joint and severally.
7. And the Plaintiff claims:
 - (a) the said sum of US\$946,855.91;

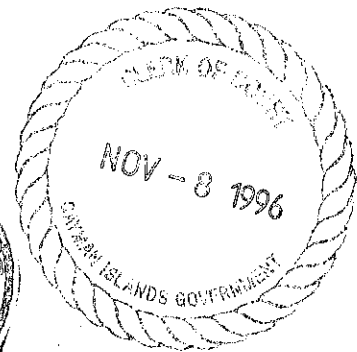


- (b) interest at 8 3/8% pursuant to the Judicature Law (1995 Revision) from the date of the Foreign Judgment to the date of issue of proceedings, being US\$70,826.76;
- (c) interest at 8 3/8% pursuant to the Judicature Law (1995 Revision) from the date of issue of the proceedings until judgment or sooner payment at the rate of US\$217.26 a day;
- (d) costs.

DATED this 8th day of November, 1996.

W.S. Walker & Co

W.S. WALKER & COMPANY
Attorneys-at-Law for the Plaintiff



FILED by W.S. Walker & Company, of P.O. Box 265, Caledonian House, Mary Street, George Town, Grand Cayman, Attorneys-at-Law for the Plaintiff whose address for service is that of his Attorneys-at-Law.