

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: OF 2008

60251

IN THE MATTER OF SECTION 10 OF THE TRUSTS LAW (2007 REVISION)
AND IN THE MATTER OF THE LAST WILL AND TESTAMENT OF BERTRAM
CHRISTOPHER DONALDSON DATED 25 JANUARY 2005

BETWEEN:

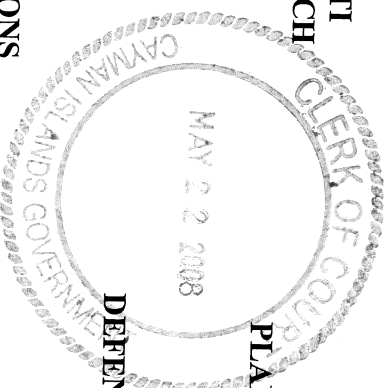
(1) ANA VALENTI
(2) CARMEN VEACH

PLAINTIFF

AND:

CARL CHEN

DEFENDANT



ORIGINATING SUMMONS


To: Carl Chen
12 Templemead
St Andrew
Jamaica

LET THE DEFENDANT of 12 Templemead, St Andrew, Jamaica attend before the Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the day of 2008, at o'clock on the hearing of an application by the Plaintiffs of 2003 Jerome Drive, Tampa, Florida, USA for the following relief:

1. That the Court remove Carl Chen as a Trustee from the last will and testament of Bertram Christopher Donaldson and substitute Michael Valenti or some other person as this Honourable Court deems appropriate as a Trustee pursuant to Section 10 of the Trusts Law (2007 Revision) and/or the Court's inherent jurisdiction;
2. That Carl Chen pay the costs of this application;
3. Any other order that this Honourable Court deems appropriate.

AND LET THE DEFENDANTS, within 28 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgement of Service to the Courts office, P. O. Box 495, George Town, Grand Cayman.

Dated this 22nd day of May 2008.



CAMPBELLS

Attorneys-at-Law for the Plaintiffs

NOTES:-

- (1) This Summons 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 above date unless renewed by order of the Court.
- (2) If a defendant does not attend personally or by his attorney at the time and place above-mentioned such order will be made as the Court may think just and expedient.

IMPORTANT

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

THIS ORIGINATING SUMMONS is filed by Campbells Attorneys-at-Law for the Plaintiffs whose address for service is 4th Floor, Scotia Centre, PO Box 884GT, George Town, Grand Cayman. (MPC/15161)

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CHRISTOPHER DONALDSON DATED 25 JANUARY 2005

BETWEEN:

(1) ANA VALENTI

(2) CARMEN VEACH

PLAINTIFF

AND:

CARL CHEN

DEFENDANT

**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 Respondent by whom or on whose behalf the service of the Originating Summons is being acknowledged.

(1) ANA VALENTI (2) CARMEN VEACH

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

yes

no

Service of the Originating Summons is acknowledged accordingly.

(Signed)

[Attorney] for

* [Respondent in person]

Address for service:

Notes on address for service

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

Respondent in person: where the Respondent 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 Applicant's Attorney (or by Applicant if suing in person) of his name, address and reference, if any, in the box below.

CAMPBELLS
Attorneys at Law
4th Floor
Scotia Centre
PO Box 884
Grand Cayman
KY1-1103
CAYMAN ISLANDS

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

**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 Respondent or by the Respondent 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 Respondent (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 Respondent personally is treated as having been served on the day it was delivered to him.
4. Where the Respondent 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 Respondent 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 Respondent 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 Respondent 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 Respondent is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian *ad litem*.
9. A Respondent acting in person may obtain help in completing the form at the Courts Office.