

**IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION**

CAUSE NO: FSD 4 OF 2020

**BETWEEN:**



**ROBERT W. SEIDEN, IN HIS CAPACITY AS  
TEMPORARY RECEIVER OF LINK MOTION INC.**

**PLAINTIFF**

**AND:**



**LINK MOTION INC.**



**DEFENDANT**

**ORIGINATING SUMMONS**

**LET THE DEFENDANT**, whose most recent registered office is Maples Corporate Services Limited, PO Box 309, Ugland House, Grand Cayman KY1-1104, Cayman Islands, attend before the Judge in Chambers, at the Law Courts, George Town, on the \_\_\_\_ day of \_\_\_\_\_, 2020, at \_\_\_\_\_ on the hearing of an application by the Plaintiff, of 469 Seventh Avenue, 5th Floor, New York, New York 10018, United States of America, for the following orders from the Court:

1. Recognizing the Plaintiff's appointment as temporary receiver of the Defendant under the Order Granting Preliminary Injunction and Appointing Temporary Receiver made by the United States District Court for the Southern District of New York dated 1 February 2019 in case number 1:18-cv-11642 (the **Receivership Order**), including the powers and functions granted to the Plaintiff under the Receivership Order.
2. Alternatively, under section 11A of the Grand Court Law (2015 Revision), appointing Robert W. Seiden, of Seiden Law Group LLP, and a Cayman Islands insolvency practitioner, to be nominated by Robert W. Seiden, as joint receivers of the entire assets, undertaking and business of the Defendant in aid of the above noted proceedings in the United States District Court for the Southern District of New York.
3. Such further orders or directions as counsel may advise or the Court considers just.

**AND LET THE DEFENDANT**, within 14 days after service of this summons on it counting the day of service, return the accompanying Acknowledgement of Service to the Courts office.

**DATED** the 13 day of January, 2020.

KSG  
**KSG ATTORNEYS AT LAW**  
Attorneys for the Plaintiff

**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 was issued by KSG Attorneys at Law, attorneys for the Plaintiff, whose address for service is 4th Floor Harbour Centre, 42 North Church Street, PO Box 2255, Grand Cayman KY1-1107, Cayman Islands.

**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 14 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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**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.

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

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

yes

no

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Service of the Originating Summons is acknowledged accordingly

(Signed).....

[Attorney] for

[Defendant in person]

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 or principal office.

**Please complete overleaf**

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

KSG Attorneys at Law  
4th Floor Harbour Centre  
42 North Church Street  
PO Box 2255  
Grand Cayman KY1-1107  
Cayman Islands

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

