

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

165
CAUSE NO: FSD OF 2020 ()

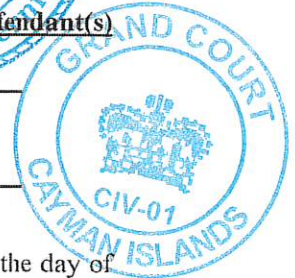
IN THE MATTER OF THE COMPANIES LAW (2020 REVISION)
AND IN THE MATTER OF GLOBAL-IP CAYMAN

BETWEEN:

BRONZELINK HOLDINGS LIMITED

AND

(1) GLOBAL-IP CAYMAN
(2) STM ATLANTIC N.V.



ORIGINATING SUMMONS

LET THE DEFENDANTS, within 14 days after service of this Summons on them, counting the day of service, return the accompanying Acknowledgment of Service to the Courts Office, P.O. Box 495G, George Town, Grand Cayman.

By this Summons, which is issued on the application of Bronzelink Holdings Limited (“**Bronzelink**”), whose Registered Office is at 2nd Floor Abbott Building, Waterfront Drive, P.O. Box 3169, Road Town, Tortola, VG 1110, British Virgin Islands, Bronzelink seeks the determination of the Court on the following questions, namely:

- a) The identity of the current Series A Director members of the board of directors (“**Board**”) of Global-IP Cayman, being a company registered in the Cayman Islands on 16 April 2013 as an exempted company with registration number 277106 (“**Company**”), who have been duly appointed in accordance with the Articles of Association of the Company (“**Articles**”).
- b) The dates of appointment of the Series A Director members of the Board and in so far as is necessary the dates of resignation / removal of any previous Series A Director members of the Board.

- e) The identity of the Chief Executive Officer (“CEO”) and Chief Technical Officer (“CTO”) of Global-IP Cayman, who have been duly appointed in accordance with the Articles of Association of the Company.

And Bronzelink seeks orders from the Grand Court as follows:

- 1) A declaration that the current Series A Directors of the Company and each of their dates of appointment to the Board are, in accordance with the Articles, the following:

a) Mr Bahram Pourmand	(Series A Director)	(1 April 2020)
b) Mr Nagib Nadim Chahine	(Series A Director)	(1 April 2020)
c) Mr Kwok Chiu Calvin Tang	(Series A Director)	(1 April 2020)
d) Mr Jianluo Zhang	(Series A Director)	(14 January 2019)
e) Mr David Ngar Yin Wan	(Series A Director)	(17 April 2020).

- 2) A declaration that the following previous Series A Directors of the Company ceased, in accordance with the Articles, to be directors of the Company on the dates set out:

a) Ms Shiyue Liu (“Ms. Liu”)	Resigned:	28 August 2019;
b) Mr Hai Ming Zhang	Removed:	20 July 2020
c) Mr Shiwan Fan	Removed:	20 July 2020.

- 3) In the alternative to sub-paragraph 2)a) above, a declaration that Ms. Liu was removed as a Series A Director of the Company, in accordance with the Articles, on 20 July 2020 and in those circumstances in the alternatives to sub-paragraph 1)a), 1)b) and 1)c) and 1)e) above a declaration that the date of appointment for one of, or in the further alternative all of, those Series A Directors is 20 July 2020.
- 4) A declaration that those Directors named above at paragraph 1 above, are, in accordance with the Articles, entitled to be registered by the Registrar of Companies of the Cayman Islands as directors of the Company.

5) A declaration that the current CEO and CTO of the Company, and each of their dates of appointment as Officers of the Company, are, in accordance with the Articles, the following:

- | | | |
|---------------------------|-------|-------------------|
| a) Mr Bahram Pourmand | (CEO) | (21 June 2016) |
| b) Mr Nagib Nadim Chahine | (CTO) | (16 October 2017) |

6) A declaration that Mr Shafiqh Youssefzadeh was not appointed as the CEO of the Company on 7 February 2020 and his purported appointment as the CEO shall be removed from the Register of Directors and Officers of the Company.

7) Such further or other declarations or other relief as the Grand Court shall see fit.

If the Defendants do not acknowledge service, such judgment may be given or order made against or in relation to them as the Court may think just and expedient.

Dated the 22nd day of July 2020.



PRIESTLEYS

NOTE – 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 that date unless renewed by order of the Court.

IMPORTANT

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

DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE OF ORIGINATING SUMMONS

The accompanying form of *Acknowledgement 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, PO Box 495G, George Town, Grand Cayman.

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement 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 fourteen (14) days for acknowledging service, a Summons 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 authorized to act on behalf of the Company, but the Company can take no further steps in the proceedings without an Attorney acting on its behalf.
8. Where the Defendant is a MINOR or a MENTAL HEALTH 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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FINANCIAL SERVICES DIVISION

CAUSE NO: FSD OF 2020 ()

IN THE MATTER OF THE COMPANIES LAW (2020 REVISION)
AND IN THE MATTER OF GLOBAL-IP CAYMAN

BETWEEN:

BRONZELINK HOLDINGS LIMITED

Plaintiff

AND

(1) GLOBAL-IP CAYMAN
(2) STM ATLANTIC N.V.

Defendant(s)

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

(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 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.

Please complete overleaf

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

Priestleys
PO Box 30310
Second Floor, Caribbean Plaza
878 West Bay Road
Grand Cayman KY1-1202
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.

