



IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD OF 2022 ( *RPJ* )

IN THE MATTER OF THE COMPANIES ACT (2022 REVISION)

AND IN THE MATTER OF BBSHARES CAPITAL MANAGEMENT LIMITED

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NOTICE OF ORIGINATING MOTION

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TAKE NOTICE that the Court at the Law Courts, George Town, Grand Cayman will be moved on 5 October 2022 at 8 am/pm or as soon thereafter as counsel can be heard, by counsel on behalf of the Applicant, Guang Huang, for an order that:

1. Andrew Morrison and Kieran Linton of FTI Consulting (Cayman) Ltd, Suite 3212, 53 Market Street, Camana Bay, Grand Cayman KY1-1203, Cayman Islands shall be appointed, pursuant to section 64 of the Companies Act (2022 Revision), as inspectors (the "**Inspectors**") to BBSHARES Capital Management Limited (the "**Company**") to:
  - (a) Examine and report to the Court on the status of the Company's member shares;
  - (b) Review and investigate the trading activities, accounting books, records and documents of the Company;

THIS NOTICE OF ORIGINATING MOTION was filed by Carey Olsen, attorneys-at-law for the Applicant, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands KY1-1001 (ref: PS/TB/1079959.0001).

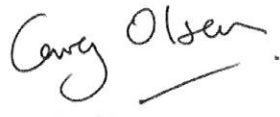
- (c) Identify the assets, liabilities, and financial status of the Company;
  - (d) Review and investigate all financial accounts and records, management accounts, unaudited and audited financial statements and records of investments, payments and receipts of the Company in the period from January 2018 to the date of the appointment of the Inspectors; and
  - (e) Review and investigate any potential related party transactions involving the Company and its shareholders, officers, directors, service providers, and agents in the period from January 2018 to the date of the appointment of the Inspectors, including any transactions involving: (i) the Company, and (ii) Hongtao (Jason) Qiao ("**Qiao**") and JingJing Zhou ("**Zhou**") or any entities in which Qiao and/or Zhou hold a beneficial interest.
2. Without prejudice to the generality of paragraph 1 above, the Inspectors shall be empowered to:
- (a) Examine all of the Company's books, records and documents, in the custody or power of the Company or its officers and agents; and
  - (b) Examine on oath the officers and agents of the Company in relation to its business activities, including Qiao and/or Zhou; and
  - (c) Report the Inspectors' findings to this Honourable Court.
3. The Inspectors shall prepare a report to the Court addressing the matters in paragraph 1 above that shall be filed and served upon the Applicant and the Company not later than six weeks from the date of the Order appointing the Inspectors, subject to the Inspectors having liberty to apply to extend this period.

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4. The Inspectors shall have liberty to apply to the Court for further or other directions upon giving not less than 3 working days prior notice to the Applicant and the Company.
5. The Applicant shall have liberty to apply to vary or discharge the Order appointing the Inspectors upon giving not less than 5 working days prior notice to the Company.
6. All costs and expenses of and incidental to the appointment of the Inspectors, the investigation and examination conducted by the Inspectors and the report of the Inspectors, including without limitation the Applicant's legal costs and expenses and the Inspectors' remuneration and expenses, shall be paid by the Company on a full indemnity basis.

**AND FURTHER TAKE NOTICE** that the grounds of this application are set out in the First Affidavit of Guang Huang dated 6 September 2022.

Dated the 9th day of September 2022



Carey Olsen

**Carey Olsen**  
Attorneys for the Applicant

TO: The Clerk of the Court

AND TO: BBSHARES Capital Management Limited

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