



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

CAUSE NO: FSD OF 2023 ()

**IN THE MATTER OF THE APPLICATION FOR INTERIM RELIEF UNDER SECTION
11A OF THE GRAND COURT ACT (2015 REVISION) AND SECTION 54 OF THE
ARBITRATION ACT, 2012**

BETWEEN: (1) LEED EDUCATION HOLDING LIMITED

Plaintiffs

(2) NATIONAL EDUCATION HOLDING LIMITED

(3) HYDE EDUCATION HOLDING LIMITED

(1)

AND:

MINSHENG VOCATIONAL EDUCATION COMPANY LIMITED

Defendant

ORIGINATING SUMMONS

TO: Minsheng Vocational Education Company Limited, of Conyers Trust Company (Cayman) Limited, PO Box 2681, Cricket Square, Hutchins Drive, George Town, Grand Cayman, Cayman Islands

AND LET THE DEFENDANT within 14 days after service of this Summons on the Defendant, return the accompanying Acknowledgement of Service to the Courts office, PO Box 495G, George Town, Grand Cayman.

By this Summons, which is issued on the application of the Plaintiffs, c/o Walkers (Cayman) LLP, 190 Elgin Avenue, George Town, Grand Cayman KY1-9001, the Plaintiffs claim against the Defendant for orders that:

1. Until the delivery of a final arbitral award on the merits in respect of each of the following proceedings outside of the Cayman Islands:
 - (a) the arbitration commenced by the Plaintiffs on 26 October 2021 against the Defendant by way of service of the Notice of Arbitration dated 26 October 2021 at Hong Kong International Arbitration Centre in Hong Kong in the arbitration proceedings HKIAC/A21203, pursuant to Clause 22 of a Sale and Purchase Agreement entered into between the Plaintiffs and the Defendant on 20 August 2018; and
 - (b) the arbitration initiated by a written application lodged with the China International Economic and Trade Arbitration Commission ("**CIETAC**") on 11 May 2023, by *inter alia*, the Plaintiffs against the Defendant, pursuant to Clause 19 of a loan agreement dated 24 December 2018 and Clause 18 of a loan agreement dated 27 June 2019, between, *inter alia*, the Plaintiffs and the Defendant,

the Defendant, whether by itself or by its servants, agents or otherwise, be restrained from taking any steps to enforce (i) the Share Charge dated 24 December 2018 between the 1st Plaintiff and the Defendant, (ii) the Share Charge dated 24 December 2018 between the 2nd Plaintiff and the Defendant, and (iii) the Share Charge dated 24 December 2018 between the 3rd Plaintiff and the Defendant respectively (together, the "**Share Charges**") against 49% of the issued share capital of Leed International Education Group Inc., the charged

property pursuant to the Share Charges (the "**Charged Property**"), whether pursuant to the Share Charges or otherwise, including without limitation, taking any steps to exercise voting rights and/or consensual powers pertaining to the Charged Property or any part thereof, to sell, transfer, grant options over or otherwise dispose of the Charged Property or any part thereof, or to receive and retain any dividends, interest or other moneys or assets accruing on or in respect of the Charged Property or any part thereof.

2. The parties shall have liberty to apply.
3. The costs of and incidental to this Summons be reserved.
4. Such further and other relief as this Honourable Court may deem just and equitable.

If the Defendant does not acknowledge service, such judgment may be given or order made against him as the Court may think just and expedient.

DATED the 18th day of May 2023

Walkers

WALKERS (CAYMAN) LLP
Attorneys-at-Law for the Plaintiffs

NOTE – the 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.

This Originating Summons is filed by Walkers (Cayman) LLP, Attorneys at Law, 190 Elgin Avenue, George Town, Grand Cayman KY1-9001, Cayman Islands for the Plaintiffs whose address for service is care of said Attorneys at Law.

IMPORTANT

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

**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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Defendant

**ACKNOWLEDGEMENT 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

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

State whether the Defendant intends to contest 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 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.

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

Walkers (Cayman) LLP
190 Elgin Avenue
George Town
Grand Cayman KY1-9001
Cayman Islands

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