

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495G, George Town, Grand Cayman, the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 7th day of April 2025.

NOTE - This Writ 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 date of issue unless renewed by order of the Court.

This **WRIT** was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Level 1, Willow House, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

IMPORTANT

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

GENERAL ENDORSEMENT

On the grounds pleaded in the accompanying Statement of Claim (all capitalised terms to have the meaning given to them in the Statement of Claim):

AND THE PLAINTIFFS CLAIM AGAINST THE DEFENDANT:

1. A declaration that the Plaintiffs validly rescinded the Subscription Agreement as set out in paragraph 48 of the accompanying Statement of Claim;
2. An order for all necessary accounts and inquiries into what has happened to the Invested Funds and their traceable proceeds and/or product;
3. Declarations (a) that the Plaintiffs are entitled to trace their respective portion of the Invested Funds into and have a beneficial interest in the traceable proceeds and/or product thereof, and (b) that the Defendant holds each Plaintiff's respective share of the Invested Funds and the traceable proceeds or product thereof (whether as held in D's Bitfinex Account, the Traced Wallets, or in any other form) on constructive trust for the benefit of each respective Plaintiff;

AND P1 FURTHER CLAIMS AGAINST THE DEFENDANT:

1. An order for the transfer and/or delivery up to P1 of its US\$25,000,000 share of the Invested Funds and/or the traceable proceeds or product thereof;
2. Alternatively, damages or equitable compensation in the principal amount of US\$25,000,000 and interest thereon;
3. Costs;
4. Such further or other relief as may be appropriate;

AND P2 FURTHER CLAIMS AGAINST THE DEFENDANT:

1. An order for the transfer and/or delivery up to P2 of its US\$6,532,000 share of the Invested Funds and/or the traceable proceeds or product thereof;

2. Alternatively, damages or equitable compensation in the principal amount of US\$6,532,000 and interest thereon;
3. Costs; and
4. Such further or other relief as may be appropriate.

For the avoidance of any doubt, insofar as the aforesaid remedies are alternative in nature, the plaintiffs reserve the right to elect between such alternative remedies until trial or before judgment.



CAREY OLSEN
Attorneys-at-Law for the Plaintiffs

Dated this 7th day of April 2025

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS**

1. 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, PO Box 495G, George Town, Grand Cayman, KY1-1106, Cayman Islands.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a Defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his Defence within the appropriate time, the Plaintiffs may enter judgment against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by installments or otherwise.

See overleaf for Notes for Guidance

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. For the purpose of calculating the period of 28 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.
3. 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 Writ of Summons)".
4. 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.
5. 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.
6. 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 step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD 85 OF 2025 ()

BETWEEN:

(1) TARGET GLOBAL GROWTH FUND II, SCSP-RAIF
(2) ANTLER GLOBAL FUND MASTER S.A.R.L. SICAV-RAIF

Plaintiffs

AND

LIU XUN

Defendant

ACKNOWLEDGMENT OF SERVICE

OF WRIT OF 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.

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

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

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

yes no

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

yes no

Service of the Writ is acknowledged accordingly

(Signed) _____

CONYERS DILL & PEARMAN LLP

Attorneys-at-Law for the Defendant

Please complete overleaf

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

Carey Olsen (Attn: Denis Olarou /
Jason Mbakwe)
Willow House
Cricket Square PO Box 10008
Grand Cayman KY1-1001
Cayman Islands
(denis.olarou@careyolsen.com /
jason.mbakwe@careyolsen.com)

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