



THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD OF 2025 ()

BETWEEN:

LINKSURE GLOBAL HOLDING LIMITED

Plaintiff

-and-

(1) INFINITE SOLUTION LIMITED

(2) ANG TECK SHANG

(3) GABRIEL LI

Defendants

WRIT OF SUMMONS

TO:

(1) INFINITE SOLUTION LIMITED of Vistra (Cayman) Limited P.O. Box 31119
Grand Pavilion, Hibiscus Way, 802 West Bay Road, Grand Cayman, Cayman Islands
KY1-1205;

(2) ANG TECK SHANG of 20 Upper Serangoon View #05-19 Singapore 534203;
and

(3) GABRIEL LI of Suite 5612, 56/F, The Center, 99 Queen's Road Central, Central,
Hong Kong

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff,
LinkSure Global Holding Limited c/o Carey Olsen, PO Box 10008, Willow House,

Cricket Square, Grand Cayman, KY1-1001, Cayman Islands, Cayman Islands, in respect of the claim set out on the next page.

Within 28 days or such other period as the court may direct 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 Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment 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 21st day of July 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.

IMPORTANT

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

GENERAL INDORSEMENT

1. This is a claim by the Plaintiff, a Cayman Islands-incorporated holding company of the LinkSure group of companies (the “**LinkSure Group**”) against the First Defendant, a holder of Series B and B+ preferred shares in the Plaintiff, the Second Defendant, formerly a director of the Plaintiff, and the Third Defendant, the controller of the First Defendant.
2. The Plaintiff’s claim arises out of events from 2020 when the Defendants’ actions prevented the Plaintiff from conducting an initial public offering of its shares (the “**IPO**”). The failure to conduct an IPO meant that the Plaintiff had to enter into share purchase agreements with its preferred shareholders which resulted in the Plaintiff purchasing half of the shares held by the preferred shareholders, being granted a call option, and providing a put option to the preferred shareholders.
3. The Plaintiff’s claim is for unlawful means conspiracy on the basis that:
 - (a) The Defendants entered into a combination and/or an agreement with the common intention of injuring the Plaintiff.
 - (b) The Defendants carried out the conspiracy by the unlawful means of the Second Defendant’s breach of the duties he owed to the Plaintiff as a director, breaches of the articles of association of the Plaintiff, and the tort of intimidation.
 - (c) The conspiracy has caused loss and damage to the Plaintiff because it resulted in an arbitral tribunal issuing an award against the Plaintiff for payment of the sum of \$71 million.
4. The Plaintiff seeks damages for that amount as well as the additional losses suffered as a result of the Defendants’ conspiracy.

AND THE PLAINTIFF CLAIMS:

- (1) Damages of \$71 million.
- (2) Interest pursuant to the Court's equitable jurisdiction and/or pursuant to section 34 of the Judicature Act or on such other basis as the Court may direct.
- (3) Costs.
- (4) Further or other relief as the Court may think appropriate.

Dated this 21st day of July 2025

A handwritten signature in black ink that reads "Carey Olsen". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Carey Olsen

Attorneys-at-law for the Plaintiff

THIS WRIT was issued by Carey Olsen, Attorneys-at-law for the Plaintiff, whose address for service is: PO Box 10008, Willow House, Cricket Square, Grand Cayman, KY1-1001, Cayman Islands.

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 495, George Town, Grand Cayman KY1-1106, Cayman Islands.

2. A Defendant who states in his Acknowledgement 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 of 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 Plaintiff 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 Acknowledgement of Service, that he intends to apply to for a stay, execution will be stayed for 14 days after his Acknowledgement, 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 instalments or otherwise.

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 writ, 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 28 days or such other period as the court may direct 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 “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.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
FINANCIAL SERVICES DIVISION

CAUSE NO. FSD OF 2025 ()

BETWEEN:

LINKSURE GLOBAL HOLDING LIMITED

Plaintiff

-and-

(1) INFINITE SOLUTION LIMITED

(2) ANG TECK SHANG

(3) GABRIEL LI

Defendants

**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.**

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

2. State whether the Defendant intends to contest or otherwise participate in 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.

[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 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

PO Box 10008, Willow House,

Cricket Square, Grand Cayman, KY1-1001

Cayman Islands.

Attn: Denis Olarou (denis.olarou@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.

--