



GRAND COURT OF THE CAYMAN ISLANDS

JUDICIAL SERVICES DIVISION

CAUSE NO. FSD 186 OF 2026 (DDJ)

IN THE MATTER OF AN APPLICATION FOR NORWICH PHARMACAL RELIEF
AND IN THE MATTER OF SECTION 11A OF THE GRAND COURT ACT (2026 REVISION)

BETWEEN:

- (1) KUSHKI GROUP HOLDINGS, LTD
- (2) KUSHKI S. DE R.L. DE C.V.
- (3) POCKET DE LATINOAMERICA S.A. DE C.V.

PLAINTIFFS

AND

ADVANTAGE INTERNATIONAL MANAGEMENT (CAYMAN) LTD

DEFENDANT

ORIGINATING SUMMONS

LET THE DEFENDANT, Advantage International Management (Cayman) Ltd, of P.O. Box 453, Suite 5304, 18 Forum Lane, Camana Bay, Grand Cayman, KY1-9006, Cayman Islands, attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the 30 day of July, 2026 at 10 am/pm on the hearing of an application by Kushki Group Holdings, Ltd, Kushki S. de R.L. de C.V., and Pocket de Latinoamerica S.A. de C.V. ("**Plaintiffs**") whose address for service is Carey Olsen, Level 6, Pavilion East, Cricket Square, Grand Cayman, Cayman Islands KY1-1001, pursuant to the jurisdiction established in the case of *Norwich Pharmacal Co v Customs*

This Originating Summons was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Pavilion East, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

and Excise Commissioners [1974] 3 WLR 164 and s. 11A of the Grand Court Act (2026 Revision), for the following orders and directions:

1. Within 14 days of being served with the Order made pursuant to this Originating Summons, Advantage International Management (Cayman) Ltd ("**Defendant**") shall provide to the Plaintiffs' attorneys the following documents and information with respect to Citadelle Investment Ltd ("**Citadelle**"):
 - 1.1 Citadelle's complete Register of Members showing all historic changes ("**ROM**");
 - 1.2 Citadelle's complete Register of Directors showing all historic changes ("**ROD**");
 - 1.3 all documents evidencing the ultimate beneficial owner of Citadelle, including but not limited to the Beneficial Ownership Register ("**BO Documents**");
 - 1.4 any contract or agreement identifying the person authorised to give instructions to the Defendant on behalf of Citadelle ("**RO Agreement**");
 - 1.5 to the extent that the Defendant currently accepts (or had ever accepted) instructions in relation to Citadelle from any person other than one of the current members identified in the ROM, one of the current directors identified in the ROD, one of the current ultimate beneficial owners identified in the BO Documents, or the person identified in the RO Agreement, the full name of such person; and
 - 1.6 any documents or records evidencing the provision of instructions by Mr Alejandro Prado Guizar to the Defendant in relation to Citadelle, including but not limited to correspondence, mandates, or internal records of such instructions.
2. The Defendant's reasonable costs of complying with any Order made by the Court in relation to this Originating Summons to be paid by the Plaintiffs on the standard basis, to

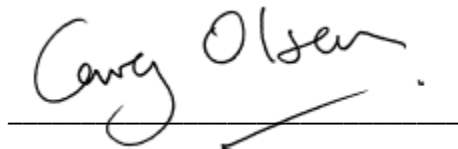
This Originating Summons was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Pavilion East, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

be taxed if not agreed.

3. Such further or other relief as the Court sees fit.

AND LET THE DEFENDANT within 14 days after service of this summons on the Defendant counting the day of service, return the accompanying Acknowledgment of Service to the Courts office.

Dated the 4th day of June 2026

A handwritten signature in cursive script, reading "Carey Olsen", is written over a horizontal line.

Carey Olsen
Attorneys-at-Law for the Plaintiffs

TO: The Registrar of the Financial Services Division

TIME ESTIMATE: 2 hours

NOTES:-

- (1) 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 the above date unless renewed by order of the Court.
- (2) If a Defendant does not attend personally or by that Defendant's attorney at the time and place above-mentioned such order will be made as the Court may think just and expedient.

IMPORTANT

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

This Originating Summons was issued by Carey Olsen, Attorneys for the Plaintiffs, whose address for service is Pavilion East, Cricket Square, Grand Cayman, Cayman Islands, KY1-1001.

**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(s) or by the Defendant(s) 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 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 acknowledgement 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 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.

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 2026 ()

IN THE MATTER OF AN APPLICATION FOR NORWICH PHARMACAL RELIEF

AND IN THE MATTER OF SECTION 11A OF THE GRAND COURT ACT (2026 REVISION)

BETWEEN:

(1) KUSHKI GROUP HOLDINGS, LTD

(2) KUSHKI S. DE R.L. DE C.V.

(3) POCKET DE LATINOAMERICA S.A. DE C.V.

PLAINTIFFS

AND

ADVANTAGE INTERNATIONAL MANAGEMENT (CAYMAN) LTD

DEFENDANT

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 Delay may result in judgment being entered against a
notes for guidance carefully before completing this Defendant whereby he may have to pay the costs of
form. If any information required is omitted or given applying to set it aside.
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: _____

Attorneys-at-Law for the [Defendant]

Please complete overleaf

This Originating Summons was filed by Carey Olsen, attorneys-at-law for the Plaintiffs, whose address for service is Level 6, Pavilion East, Cricket Square, Grand Cayman, Cayman Islands KY1-1001.

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.

Denis Olarou
(denis.olarou@careyolsen.com)
Carey Olsen
Pavilion East, Cricket Square
Grand Cayman
KY1-1001
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.

This Originating Summons was filed by Carey Olsen, attorneys-at-law for the Plaintiffs, whose address for service is Level 6, Pavilion East, Cricket Square, Grand Cayman, Cayman Islands KY1-1001.