

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. OF 2011

BETWEEN

DR STANLEY HO (also known as HO HUNG SUN STANLEY) Plaintiff

AND

HO CHIU FUNG, DAISY	1 st Defendant
HO CHIU KING, PANSY	2 nd Defendant
LUCINA LAAM KING YING	3 rd Defendant
PATRICK HUEN WING MING	4 th Defendant
MAISIE HO	5 th Defendant
JOSIE HO	6 th Defendant
LAWRENCE HO	7 th Defendant
CHAN UN INA	8 th Defendant
ACTION WINNER HOLDINGS LIMITED	9 th Defendant
RANILLO INVESTMENTS LIMITED	10 th Defendant
LANCEFORD COMPANY LIMITED	11 th Defendant

INDORSEMENT OF CLAIM

The Plaintiff claims, (by way of derivative action on behalf of the 11th Defendant) against the 1st – 4th Defendants for:

- (1) Damages for breach of directors fiduciary duties in purporting to improperly and/or illegally pass resolutions(s) to allot 5,053 and 4,945 ordinary shares of and in the 11th Defendant to the 9th and 10th Defendant respectively (the “Allotted Shares”) without providing full consideration to the 11th Defendant and/or in contravention of the requirements of the 11th Defendant’s Articles of Association and/or the Companies Ordinance (Cap. 32).

The Plaintiff claims against the 1st, 2nd and 5th – 8th Defendants for:

- (2) An injunction to restrain each of the 1st, 2nd and 5th – 8th Defendants, (who are

directors and/or shareholders of either, or both of the 9th and 10th Defendants) from taking any action to dispose of, encumber or otherwise deal (or procure or facilitate the disposal and/or encumbering of or dealing) with the Allotted Shares or voting on the same in any manner whatsoever.

The Plaintiff claims, (both in his own right as a shareholder in the 11th Defendant and also, in so far as necessary, by derivative action) against the 9th and 10th Defendants for:

- (3) An injunction to restrain each of them from disposing of, encumbering or otherwise dealing with the Allotted Shares or voting on the same.
- (4) An injunction to restrain each of them from causing the 11th Defendant to dispose of, encumber or otherwise deal with its shareholding in Sociedade Turismo e Diversoes de macau, S.A.(STDM) or to cause the 11th Defendant to vote the said shares.
- (5) A Declaration that the Allotted Shares were improperly and unlawfully allotted to the 9th and 10th Defendants.
- (6) An Order to set aside the allotments and to rectify the members register of the 11th Defendant.
- (7) Damages arising from the improper and/or unlawful allotment of the Allotted Shares.

The Plaintiff claims against all Defendants:

- (8) Interest on damages and, if awarded under the Court's equitable jurisdiction, compound interest.
- (9) All necessary orders, accounts and enquiries.
- (10) Costs; and
- (11) Such further and other relief as may seem just to the Court.

Dated this the 26th day of January 2011


Oldham Li & Nie
Solicitors for the Plaintiff

*[Statement of Claim]

The Plaintiff's claim is for _____

I, DR STANLEY HO, CONFIRM THAT THE CONTENTS OF
THIS STATEMENT/ENDORSEMENT OF CLAIM IS TRUE.



*Where words appear between square brackets delete if inapplicable.

*(Signed if statement of claim indorsed.)

A statement of claim must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

(Where the Plaintiff's claim is for a debt or liquidated demand only: If, within the time for returning the Acknowledgment of Service, the Defendant pays the amount claimed and \$ _____ for costs, further proceedings will be stayed. The money must be paid to the Plaintiff or his Solicitor.)

THIS WRIT was issued by Messrs. Oldham, Li & Nie, Solicitors of Suite 503, St. George's Building, 2-Ice House Street, Central, Hong Kong, Solicitors for the said Plaintiff 1 Repulse Bay Road, Hong Kong



