

IN THE SUPREME COURT OF THE STATE NEW YORK, COUNTY OF NEW YORK

INDEX NO. 650130/2018

BETWEEN:

SURF HORIZON LIMITED

Plaintiff

-AND-

PAUL J. MANAFORT

-AND-

RICHARD W. GATES III

-AND-

**PERICLES EMERGING MARKEY PARTNERS L.P.
C/O ALEXANDER LAWSON & KRIS BEIGHTON
KPMG**

Defendants

AFFIDAVIT OF SERVICE

I, **SHELDON WILLIAMS**, of The Security Centre Limited, Cayman Technology Centre, 115 Printers Way, Grand Cayman, Cayman Islands **MAKE OATH AND SAY** as follows:

1. I am employed by The Security Centre Limited and I hold a position in the special services department. I am licensed to make service under the law of the Cayman Islands.
2. The facts I depose to are within my knowledge and are true or, where not within my own knowledge are true to the best of my information and belief and derived from the sources referred to.
3. BRYAN CAVE LEIGHTON PAISNER LLP, instructed The Security Centre to serve a Summons and Copy of Complaint (the "Documents") on two individuals who are partners of KPMG, Alexander Lawson and Kris Beighton.
4. On Wednesday 9th May 2018 at about 9.45am I attended the offices of KPMG, Cricket Square, George Town, Grand Cayman. I was informed by the receptionist

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that Mr Lawson was not in the building that day. Mr Beighton was in the office and his Personal Assistant came out to speak with me, but I was informed that Mr Beighton was busy and could not come out to see me. Mr Beighton's Personal Assistant is also the personal assistant for Mr Lawson (the "Personal Assistant").

5. I again attended KPMG at the above address at 4pm and I remained by the front door until 5.30pm, but I did not see Mr Beighton.
6. On Thursday 10th May 2018 at about 09.30am I attended the offices of KPMG at the above address. I was told that Mr Lawson was not in the building and that Mr Beighton was in a meeting. I was further informed that in fact Mr Lawson was travelling and was not in Grand Cayman.
7. On Thursday 10th May 2018 at about 2pm I attended the home address of Mr Beighton at 465 Selkirk Drive, Red Bay, Grand Cayman. I knocked on the door, but the female inside who I saw through an upstairs window and explained my purpose refused to open the door.
8. On Thursday 10th May 2018 at about 3.20pm, I again attended the offices of KPMG, Cricket Square, George Town, Grand Cayman. I personally gave both sets of the Documents to the Personal Assistant. I would describe the Personal Assistant as a female with a slim build, 5'05 tall, brown hair, aged in her late 20's or early 30's. The Documents that I gave to the Personal Assistant were two copies of the summons and complaint in this lawsuit. One copy of those Documents is attached as exhibit SW1.
9. On Friday 11th May 2018, two copies of the Documents were made and sealed into two separate envelopes addressed respectively to Kris Beighton and Alexander Lawson at the KPMG mailing address, KPMG, PO Box 493 KY, Century Yard, Cricket Square, George Town, KY1-1106. Both envelopes were plain and endorsed with the legend 'Personal and Confidential,' and did not indicate in any way on the outside of the envelope that they were from an attorney or concerned a lawsuit. Both envelopes were put into the regular mailing system of the Cayman Islands.
10. I have taken photographs prior to postage of both sealed envelopes. The photographs of the envelope for Kris Beighton I exhibit as SW/2 and SW/3 and the envelope for Alexander Lawson I exhibit as SW/4 and SW/5. Those exhibits are attached.

1172-4408.110375695

Sworn before me at }
George Town, Grand Cayman, }
Cayman Islands }
This 16th day of May 2018 }

Sheldon Williams
Sheldon Williams

Maria McLean
Notary Public

Before me, Maria McLean, a Notary Public,
In and for the Cayman Islands.

This 16th day of May 2018

MARIA McLean

(My Commission expires on 31st January 2019)

