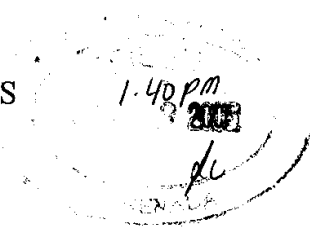


IN THE SUPREME COURT OF GRENADA  
AND THE WEST INDIES ASSOCIATED STATES  
HIGH COURT OF JUSTICE



GRENADA

Claim No. GDAHCV2003/0228

BETWEEN:

IN THE MATTER OF GRENADA INTERNATIONAL  
FINANCIAL SERVICES AUTHORITY ACT 26 OF 1999

AND

IN THE MATTER OF THE OFFSHORE BANKING ACT  
39 OF 1996

AND

IN THE MATTER OF AN APPLICATION BY BANK  
INTERNATIONAL CROZIER LIMITED

BETWEEN:

GRENVILLE WINSLOW PHILLIPS  
CONTROLLER OF BANK CROZIER INTERNATIONAL  
LIMITED

CLAIMANT

AND

5. DARYL SANDS  
OF PRICEWATERHOUSE COOPERS  
CONTROLLER OF BANK CROZIER LIMITED

6. GARVEY LOUISON  
LIQUIDATOR OF BANK CROZIER LIMITED  
(in Liquidation)

DEFENDANTS

## AFFIDAVIT IN SUPPORT OF NOTICE OF APPLICATION

I, Keron Regis, legal secretary with the firm of Anselm B. Clouden & Associates, make oath and say as follows:

1. That I am a secretary in the Office of Anselm B. Clouden & Associates, Attorneys-at-Law, and as such have knowledge of the facts hereinafter deposed to.
2. That I have been advised by Mr. Clouden of Anselm B. Clouden & Associates and verily believe that the affidavit of the First Named Defendant, Daryl Sands, sworn to on the 8<sup>th</sup> day of December 2005, is riddled with inaccuracies which have no bearing in fact.
3. That I have been further advised by Mr. Clouden of Anselm B. Clouden & Associates and verily believe that the First Named Defendant, Daryl Sands, is no longer employed with PricewaterhouseCoopers ("PwC") and therefore is not a proper party to be heard on behalf of PwC since he has not been retained by the Minister of Finance in his personal capacity, but as a partner with PwC.
4. That I have been further advised by Mr. Clouden of Anselm B. Clouden & Associates and verily believe that the First Named Defendant Daryl Sands no longer resides in Alberta, Canada; that as a matter of fact PwC is not aware of his new place of residence or of his whereabouts.
5. That I am advised by Mr. Clouden of Anselm B. Clouden & Associates and verily believe that the First Named Defendant, Daryl

Canada.

6. That indeed, certain enquiries have been made at the office of Anselm B. Clouden & Associates as to the whereabouts of Daryl Sands by several Canadian law firms.
  
7. That in the circumstances I respectfully request leave of this Honourable Court to have the First Named Defendant, Daryl Sands, cross-examined on his affidavit sworn to on the 8<sup>th</sup> day of December 2005.

SWORN TO at my Office )  
In the town of Saint George's in the )  
State of Grenada this *09<sup>th</sup>* day of )  
December 2005 )

*Kenon Keays*

BEFORE ME  
*[Signature]*  
.....  
REGISTERED  
CHIEF CLERK  
SUPREME COURT REGISTRY

This Affidavit is filed by Anselm B. Clouden & Associates of Upper Church Street, Saint George's, Grenada, Legal Practitioners for the Applicant.