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BY FACSIMILE

June 8, 2009

John J. Keenan
Attorneys and Counselors at Law
Keenan Stone Law Centre PC
207 Lake Street
Suite 2
Hamburg, New York 14075
United States of America

Dear Mr. Keenan:

**Re: Universal Settlements International Inc. -
Notice of Motion served by National Viatical, Inc.**

I am enclosing our Notice of Cross-Examination in this matter, served upon you pursuant to the Ontario *Rules of Civil Procedure*.

Yours truly,

A handwritten signature in blue ink, appearing to read "W. McNamara".

William McNamara

WM/sh
Encl.

cc. Service List (attached)
Tony Reyes, Allison Kuntz, Michael Kotrly, *Ogilvy Renault*

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OF ARRANGEMENT
OF UNIVERSAL SETTLEMENTS INTERNATIONAL INC.**

NOTICE OF CROSS-EXAMINATION

TO: JAMES TORCHIA

YOU ARE REQUIRED TO ATTEND, on Thursday, June 11, 2009, at 10:00 a.m., at the office of Victory Verbatim Court Reporting, Ernst & Young Tower, 222 Bay Street, Suite 900, Toronto, Ontario, M5K 1A6, for:

- ☒ Cross-examination on your affidavit sworn June 4, 2009, in the CCAA proceedings herein
- ☐ Examination for discovery
- ☐ Examination for discovery on behalf of or in place of
- ☐ Examination in aid of execution
- ☐ Examination in aid of execution on behalf of or in place of

YOU ARE REQUIRED TO BRING WITH YOU and produce at the examination the documents mentioned in subrule 30.04(4) of the *Rules of Civil Procedure*, and the following documents and things:

All books, contracts, letters, telegrams, statements, records, bills, notes, securities, vouchers and copies of same in your custody, possession or power in any way relating to the matters which are within the scope of this proceeding or have any reference thereto.

June 8, 2009

OGILVY RENAULT LLP

Royal Bank Plaza, South Tower
3800 - 200 Bay Street, P.O. Box 84
Toronto ON M5J 2Z4

William McNamara LSUC#: 23153S

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Lawyers for Universal Settlements
International Inc.

TO: JOHN J. KEENAN

Barrister and Solicitor (525681)
207 Lake Street, Suite 2
Hamburg, New York 14075

Tel: (716) 646-9400

Lawyer for National Viatical, Inc.

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 985, c. C-36, AS AMENDED
AND IN THE MATTER OF A PLAN OF COMPROMISE OF ARRANGEMENT OF
UNIVERSAL SETTLEMENTS INTERNATIONAL INC.

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceeding commenced at Toronto

NOTICE OF CROSS-EXAMINATION
(returnable June 11, 2009)

OGILVY RENAULT LLP
Royal Bank Plaza, South Tower
3800 - 200 Bay Street
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CANADA

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Lawyers for Universal Settlements
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SERVICE LIST
UNIVERSAL SETTLEMENTS INTERNATIONAL INC.

John P. Ormston, Esq ORMSTON LIST FRAWLEY LLP 40 University Avenue Suite 720 Toronto, ON M5J 1T1	Tel.: (416) 594-0791 Fax: (416) 594-9690 jormston@olflaw.com	Respondents: Rino Bifolchi, Cajubi Caja Paraguaya de Jucilaciones y Pensiones, Gilbert Pereira, Patrick J. Runstedler, Tom Mitchell and Daphne Mitchell
Susan M. Grundy BLAKE, CASSELS & GRAYDON LLP 199 Bay Street Suite 2800, Commerce Court West Toronto, ON M5L 1A9 Katherine McEachern BLAKE, CASSELS & GRAYDON LLP Consultant, Toronto Office	Tel: (416) 863-2572 Fax: (416) 863-2653 susan.grundy@blakes.com Tel: (416) 863-2566 Fax: (416) 863-2653 katherine.mceachern@blakes.com	Monitor: Ernst & Young Inc
John J. Keenan (525681) KEENAN STONE LAW CENTRE PC Attorneys and Counselors at Law 207 Lake Street, Suite 2 Hamburg, New York 14075	Tel.: (716) 646-9400 Fax: (716) 646-9420 jkeenan@keestonelaw.com	Respondent: National Viaticals Inc.
F.J. Hugh Shaw (LSUC #26366N) RUDERMAN, SHAW 20 Eglinton Avenue West Suite 1820 Toronto, ON M4R 1K8	Tel: (416) 484-8558 Fax: (416) 484-6918 HShaw@rudermanshaw.com	Respondents: Ramon Credi Cheja, Helen Marquard de Peterson, Nancy E. Lira-Hereford, Pedro M. Olavarri, Russel E. Kennedy, Ana M. Magaloni De Bustamante, Jose Manuel Rincon Gallardo, Lucia B. Ruiz De Olavarri, Mariagrazia Savini and Esteban Gonzalez Vergara
Irwin A. Duncan (LSUC #12857G) Michael A. vanBodegom (LSUC#39701A) WHITE, DUNCAN, LINTON LLP P.O. Box 457 45 Erb Street East Waterloo, ON N2J 4B5	Tel.: (519) 886-3340 Fax: (519) 886-8651 iad@kwlaw.net	Respondents: Boyd Rees and Judy Rees, Ted Buczek, Peter Dixon, Bogumila Lee, Janusz Poreba, Andrzej Mardula

William J. Garrison SCHEEF & STONE, L.L. P. 500 N. Akarde Street, Suite 2700 Dallas, Texas 75201	Tel.: (214) 706-4200 Fax: (214) 706-4242 bgarrison@scheefandstone.com	Respondent: Priority Pharmacy
Thomas Buchinger Director Mario Sandhu BANK AUSTRIA CREDITANSTALT VERSICHERUNGSDIENST GMBH 1010 Wien, Reichsratsstraße 17 AUSTRIA	Tel.: 43 (0)50505 Ext. 42300 or 42330 sandhu@ba-cavd.at	Respondent: Bank Austria Creditanstalt Versicherungsdienst GmbH
DR. KARL HAFELE Via Principale 43 1-39021 Laces Bolzano ITALY	Tel: 0043-664-8314890 Karl.Hafele@rhombergbau.at	Respondent: Dr. Karl Hafele