

The following information will be helpful in reading the attached 39 page Legal Summary

Q: Who are the Plaintiffs and Defendants in this case?

A: The following is a brief description of the Plaintiffs and Defendants shown on page 1 and mentioned throughout the Summary:

Viceroy, LLC - Created by David Boyce to be a holding company to protect any assets of Ness International or its subsidiaries until the public company was put in order. The commitment is to return any and all interest of Ness Israel into Ness International.

Alpha Capital Anstalt - A creditor of Ness Energy International, Inc. who, along with 2 associates, made loans to the public company in 2006. The default on these loans and subsequent collection process led to Alpha claiming ownership of Ness Energy of Israel.

Ness Energy of Israel, Inc. – A company formed in 2004 by Shannon (Sha) Stephens to do business in Israel.

Noya Oil and Gas Exploration Ltd – In 2004 **Ness Energy of Israel, Inc.** bought 100% of **Equital Management 1**. Equital (which later became **Noya Oil and Gas Exploration Ltd**) originally owned 90% of **Modi'in Energy Management 1992 LTD** and 99% of **Modi'in Energy Trusts LTD** the General Partner and Limited Partner of **Modi'in Energy LP** which trades on the Tel Aviv Stock Exchange. Noya is essentially a holding company and retains enough interest in Modi'in to have significant control over Modi'in Energy LP the publicly traded company. To better illustrate these relationships, we have attached the original organizational chart or "Holdings Structure" showing the ownership of these companies that was sent to us by Ben Bleiberg and referred to in sections #57 and #109. For clarity, we have also attached a recreated version of the chart due to the poor quality of the copy that was originally sent to us.

Do-Tsach Ltd - An Israeli company controlled by **Tsachi Sultan** through which, we argue, he illegally took over Noya Oil and Gas and became controlling shareholder.

IDB Holding Corporation Ltd - A large holding company controlled by Israeli businessman **Nochi Dankner** through which he invested in Noya. (*See Tsachi Sultan below*)

Q: Who are the individuals mentioned in the Summary?

A: The following is a brief description of these parties:

Shannon (Sha) Stephens – Incorporator of Ness Energy of Israel, Inc. and the son of the founder of Ness Energy International, Inc. He managed and controlled Ness Energy International after the death of his father until stepping aside and giving control to Alan Stricklin.

Tsachi Sultan – An Israeli investor who initially put up funds to takeover and become controlling shareholder in Noya Oil and Gas in cooperation with Ben Bleiberg and Itay Brafman. Sultan later sold Nochi Dankner’s IDB Holding Corporation approximately half his interest in Noya.

Ben Bleiberg – Appointed by Sha Stephens to be the Israeli Director of the Board and CEO of Noya up to the time of the takeover.

Itay Brafman – Noya’s Israeli Attorney who worked closely with Ben Bleiberg.

David Boyce – Became the President and Chairman of the Board of Ness Energy International, Inc. in June 2009 and is the Manager of the private oil and gas company, OKT Resources LLC.

Q: Why is Ness Israel shown as a Plaintiff with Alpha Capital?

A: First, keep in mind that the Israeli case is not attempting to determine who owns Ness Israel but rather whether the dilution and takeover of Ness Israel’s interest in Noya was legal or not, no matter who owns it. In our May 18, 2012 update, we explained how it was ruled that Alpha Capital owned the stock of Ness Israel even though Ness International may still have an equity interest. Since they claim ownership of the stock, Alpha sued on behalf of themselves and Ness Israel and so they are both Plaintiffs. (*See Section 6 on page 4*)

Q: Why was Ness Energy of Israel put up for sale and what claim of ownership does Viceroy have on Ness Israel?

A: Ness Energy of Israel was put up for sale by Alan Stricklin, who was at the time president and chairman of the board of Ness Energy International. Stricklin was simply trying to raise money at the time and saw Ness Israel as a means to that end. He “sold” Ness Israel to Viceroy with full knowledge of Alpha Capital’s claim to own the company. Viceroy’s claim of ownership comes from this transaction with Stricklin.

Q: Why do the date references look strange?

A: In Israel the date is shown as day/month/year instead of month/day/year common in America.

Q: What is meant by “General Assemblies” in sections 127 and 139?

A: In Israel a “General Assembly” is the equivalent of a “Board Meeting” in the US.

Q: What does “Agarot” refer to in the foot note on page 35?

A: “Agarot” is plural for “Agaro” which is 1/100 of a “New Israeli Shekel” (NIS). The New Israeli Shekel is worth roughly .28 US dollar.

Q: What does the term “Cloud” mean as used in the Table of Contents and in sections 32, 35, 41, 89, 90, 91, 92 and 135?

A: A “Cloud” on title is a term often used in the oil and gas industry that implies a potential problem with the ownership or title to property, i.e. something that makes the identity of the owner unclear.