Attorney General's Cha

IN THE GRAND COURT OF THE CAYMAN ISLANDS

Cause No 486 of 2011

IN THE MATTER OF LEGAL PRIVILEGE

AND IN THE MATTER OF LEGALLY PRIVILEGED DOCUMENTS

AND IN THE MATTER OF DISCLOSURE OR THREATENED DISCLOSURE OF DOCUMENTS BY THE DEFENDANT

B E T W E E N:-

THE ATTORNEY GENERAL — Plaintiff

- and -

MARTIN BRIDGER — Defendant

GRAND COURT OCT 28 2011 CAYMAN ISLANDS GOVERNMENT

NOTICE OF ORIGINATING MOTION
GCR Order 8 rule 3

TAKE NOTICE that the Court at the Law Courts, George Town, Grand Cayman will be moved on the 4th day of November 2011, at 12:00 a.m./p.m., or as soon thereafter as counsel may be heard, by counsel on behalf of the Attorney General of the Cayman Islands for an order in terms that:

1. Until further order of this Court, the Defendant is not to permit any party, including but not limited to the Plaintiff in Cause No. 255 of 2009 ("the Kernohan Proceedings") and his attorneys, to inspect or take copies of any of the documents referred to in the Defendant's disclosure list in the Kernohan Proceedings dated 19 October 2011 without the written consent of the Plaintiff.

2. The Defendant is to provide to the Plaintiff forthwith, or by such date and time as the Court shall direct, a complete hard copy set of the documents referred to in his disclosure list in the Kernohan Proceedings.

3. Following the receipt of such documents, the Plaintiff is to prepare, as soon as practicable, a final list of documents from the Defendant's disclosure list in respect of which it is claimed that legal professional privilege applies.

4. Following the production of the final list referred to at paragraph 3 above, the parties are to liaise to fix an urgent hearing at which the Court will determine whether the Defendant should continue to be restrained from permitting inspection of the documents referred to in the final list and/or whether the Defendant should be obliged to deliver up all copies of such documents in his possession to the Claimant.

5. All questions of costs are reserved to the Judge conducting the hearing referred to at paragraph 4 above.

AND FURTHER TAKE NOTICE that the grounds of this application are that, as set out in detail in the First Affidavit of Vicki Ann Ellis, the Acting Solicitor General of the Cayman Islands, the Defendant has threatened to disclose, in the Kernohan Proceedings, certain privileged documents in circumstances where the Court is entitled to and should restrain him from doing so.

Dated the 28th day of October 2011

Attorney General's Chambers

Attorney General's Chambers

TO: The Clerk of the Court

AND TO: Martin Bridger, 105 Bradstock Road Epsom Surrey KT17 2LF United Kingdom and his attorneys Stuarts Walker Hersant of Cayman Financial Centre, Dr Roy's Drive, PO Box 2510GT, George Town, Grand Cayman, KY1-1004.

This Notice of Originating Motion was issued by the Attorney General's Chambers, Attorneys for the Plaintiff, whose address for correspondence is PO Box 907, Grand Cayman KY1-1103, and whose address for service is Ground Floor - dms House, George Town, Grand Cayman.