

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. *B9346* OF 2013

AND: IN THE MATTER OF THE IMMIGRATION LAW (2011  
Revision)

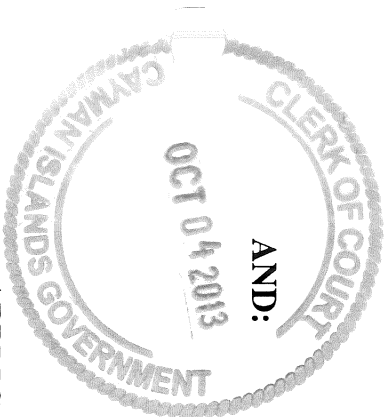
AND: IN THE MATTER OF DECISION OF THE CAYMAN STATUS  
AND PERMANENT RESIDENCY BOARD

AND: IN THE MATTER OF DONNA CITA MARIE HOLMES DUNN

BETWEEN: DONNA CITA MARIE HOLMES DUNN



APPLICANT



AND:

THE CAYMAN STATUS AND PERMANENT RESIDENCY  
BOARD

RESPONDENT

EX-PARTE  
APPLICATION FOR LEAVE TO APPLY FOR JUDICIAL REVIEW

To the Clerk of the Court, Law Courts, George Town, Grand Cayman	
Name, address and description of applicant (s)	Donna Cita Marie Holmes Dunn P. O. Box 792 GT, Grand Cayman, Janitor
Judgment, order, decision Or other proceeding in respect of which relief is sought	Decisions of the Cayman Status and Permanent Residency Board 2 July 2013


## **The Relief Sought**

1. That Leave be granted to the Applicant to apply for Judicial Review of the decision of the Caymanian Status & Permanent Residency Board dated the 2 July 2013 arising from an application to the Caymanian Status & Permanent Residency Board applying for Permanent Residence/Residency & Employment Rights Certificate pursuant to Section 30(1) of the Immigration Law (2011 Revision) and more particularly to apply for the following:-

- a) A declaration that the Board in stating to the Applicant that she was entitled to re-apply for Permanent Residence/Residency & Employment Rights Certificate in September 2012 after the Applicant's previous application dated August 2006 was refused on 31 July 2008, and an Appeal to the Immigration Appeal Tribunal from that decision was refused on 16 August 2012 created an expectation in the Applicant that her Applicant was proper and that the Board would hear the Application and had proper Jurisdiction;
- b) A declaration that the Applicant qualifies for a permanent Residence & Employment Certificate pursuant to Section 30(i) of the Immigration Law(2011 Revision);
- c) A declaration that the Applicant is domiciled and Resident in the Cayman Islands after having being and working in the Cayman Islands since 31 July 1995 and carrying on a business at George Town, Grand Cayman for two(2) years since 2010;
- d) A declaration that the Applicant who has been Resident in the Cayman Islands for eighteen (18) years without incident, as a law abiding person is entitled to be considered for and to be granted Permanent Residence with a right to Work Certificate;
- e) Interim relief in the form of an injunction pending the final determination of this application and any further formal application to remain in the Cayman Islands restraining the Chief Immigration Officer and/or any Immigration Officer and/or Servant or agent of them from sending the Applicant out of the Cayman Islands until these proceedings for Judicial Review and any further formal application to remain in the Cayman Islands are heard and determine;

f) An Order of Certiorari to remove into this Honourable Court and to quash the decision of the Caymanian Status & Permanent Residency Board;

g) An Order of Mandamus directed to the Respondent requiring them to reconsider their decision and to provide for the acceptance of the Applicants application in which the requirement for nine(9)extra points to grant Permanent Residence with the Right to Work Certificate will be provided.

Name and address of applicant's attorneys, or, if no attorneys acting, the address for service of the applicant	A. Steve McField & Associates P.O. Box 680 George Town Suit D2, Cayman Business Park 10 Huldah Avenue KY1-1107 Grand Cayman
Signed 	Dated: The 26 day of September 2013

## **GROUNDNS ON WHICH RELIEF IS SOUGHT**

1. That the factual background to this application for ex-parte leave for Judicial Review is contained in the supporting Affidavit of Donna Cita Marie Holmes Dunn that has been filed with this application and this Affidavit will be relied on in support of the application on the following grounds:-
2. The Permanent Residence/Residency Board induced the applicant to apply for Permanent Residence with the Right to Work Certificate, thus, causing an expectation in the Applicant of the Grant, and that she could remain in the Cayman Islands.
3. The Applicant Donna Cita Marie Holmes Dunn has been a Resident of the Cayman Islands for eighteen (18) years and owns land and shares in an ongoing local business, and is therefore Permanently Resident in the Cayman Islands.

The Applicant Prays for an Oral Hearing.