

IN THE GRAND COURT OF THE CAYMAN ISLANDS  
CIVIL DIVISION

60085  
CAUSE NO: OF 2014

In the Matter of Grand Court Rule, Order 55 and the Immigration Law Section 17 (2)

And in the Matter of The Appeal of DDL Studio under the Immigration Law (2013 Revision)

BETWEEN:

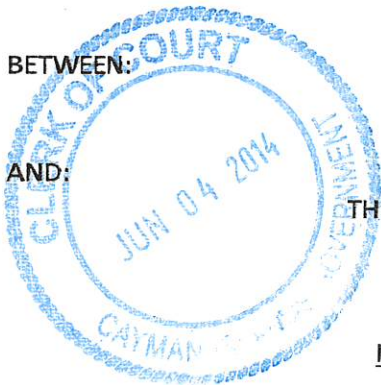
DDL STUDIO LTD.

AND:

THE IMMIGRATION APPEALS TRIBUNAL

APPELLANT

RESPONDENT



**NOTICE OF ORIGINATING MOTION**

TAKE NOTICE that the Court at the Law Courts, George Town, Grand Cayman will be moved on at or as soon thereafter as counsel can be heard, by counsel on behalf of DDL Studio Ltd. for the following relief:

1. That the decision of the Immigration Appeals Tribunal dated 24<sup>th</sup> April 2014 and served on the Appellant on 6 May 2014 to refuse the grant of a work permit to Nicholas Robert Sellars be overturned.
2. That the Appeal against the decision of the Work Permit Board dated 13<sup>th</sup> February 2009 refusing the grant of a work permit for Nicholas Robert Sellars be allowed.
3. Such further and other relief that the Court deems fit.
4. Costs.

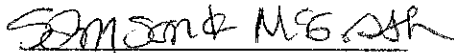
AND FURTHER TAKE NOTICE that the grounds of this appeal are:

1. The Tribunal failed to take any or any sufficient account of the Appellant's detailed Grounds dated 24 May 2010 and 17 February 2014.
2. The Tribunal failed to give any or any sufficient account to the needs of a local trading entity which had demonstrated the need for the employee but who had not received Caymanian applications for the position. In doing so, the Tribunal wrongly applied section 44(4) Immigration Law.

3. The Tribunal failed to comprehend the Appellant's explanation of the employee's scheme of remuneration.
4. In the alternative, if the Tribunal did properly assess the employee's scheme of remuneration, it wrongly refused the application for a work permit on the basis of the employee's scheme of remuneration.
5. The Tribunal failed to take into account the inordinate delay in hearing of the appeal (between 24 February 2009 and April 2014: more than 5 years).
6. The Tribunal's decision is unreasonable.
7. No reasonable tribunal properly directing itself to the law and to the facts could have come to the decision of the Tribunal.

Dated the 4 day of June 2014

Filed the 4 day of June 2014



Samson & McGrath  
Attorneys at law for the Appellant

TO: The Clerk of the Court

AND TO: The Attorney General's Chambers  
Attorneys at law for the Respondent