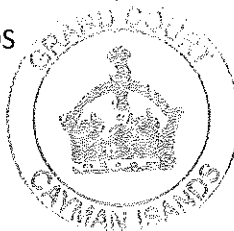


Application for Leave to Apply for Judicial Review (O.53, r.3)

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 252 OF 2014

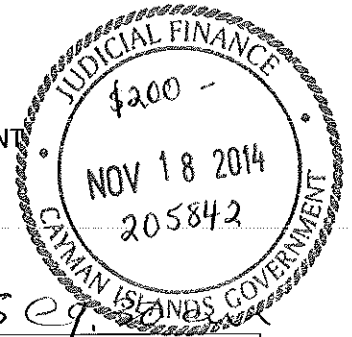
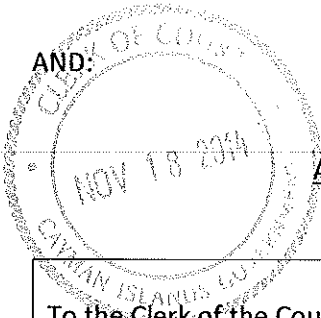
BETWEEN: VASSEL MCCALLUM



PLAINTIFF

AND: IMMIGRATION APPEALS TRIBUNAL


DEFENDANT



APPLICATION FOR LEAVE TO APPLY FOR JUDICIAL REVIEW

*8<sup>th</sup> January, 2015 eg.*

To the Clerk of the Court, Law Courts, George Town, Grand Cayman

<p>Name, address and description of applicant</p>	<p>VASSEL MCCALLUM 14-12 CUMBER AVENUE, BODDEN TOWN GRAND CAYMAN CAYMAN ISLANDS</p>
<p>Judgment, order, decision or other proceeding in respect of which relief is sought</p>	<p>Order of mandamus Quash the decision of the Immigration Appeals Tribunal Recalculation of points in accordance with the Immigration Regulations Grant of Permanent Residence to the Plaintiff</p>
<p style="text-align: center;">Relief Sought</p> <p>Quash the decision of the Immigration Appeals Tribunal Recalculation of points in accordance with the Immigration Regulations Grant of Permanent Residence to the Plaintiff</p>	
<p>Name and address of applicant's attorney</p>	<p>NATASHA N. BODDEN 5<sup>TH</sup> FLOOR GENESIS BUILDING, GEORGE TOWN PO BOX 30796, GRAND CAYMAN KY1-1204 CAYMAN ISLANDS</p>
<p>Signed</p> 	<p>Dated 18<sup>th</sup> November, 2014</p>

## GROUNDS ON WHICH RELIEF IS SOUGHT

1. The Immigration Appeals Tribunal erred in Law by dismissing the appeal on the premise that insufficient grounds of appeal were made out. Sufficient grounds of appeal were provided in letters dated 5<sup>th</sup> March, 2009, 3<sup>rd</sup> August, 2010 and 30<sup>th</sup> December, 2013 as required by Sections 15 and 16 of the Immigration Law (2013 Revision).
2. The letters referred to in paragraph 1 above prove that the Caymanian Status and Permanent Residency Board's decision to dismiss the Plaintiff's application for Permanent Residence was unreasonable, erroneous in Law, contrary to the principles of natural justice and at variation with the Regulations as per Section 15(2) of the Immigration Law (2013 Revision).
3. The Immigration Appeals Tribunal's decision to refuse to recalculate the points in accordance with the Immigration Law and Regulations is unreasonable and contrary to the principles of natural justice because there are sufficient grounds made out in the letters referred to in paragraph 1 which highlighted to the Immigration Appeals Tribunal the areas in which the Caymanian Status and Permanent Residency Board erred.
4. The Immigration Appeals Tribunal's decision to dismiss the Plaintiff's appeal is contrary to the principles of natural justice. The Plaintiff has been legally and ordinarily resident in the Cayman Islands for more than twenty (20) years and has only known this to be his home for all of those twenty (20) years.