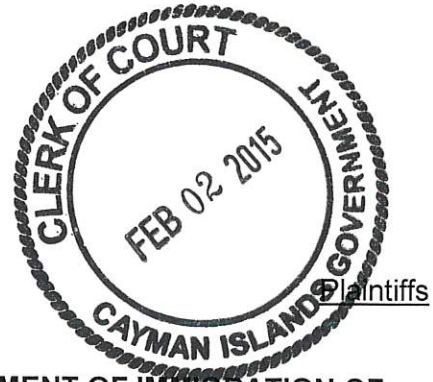


IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: *GIS* OF 2015

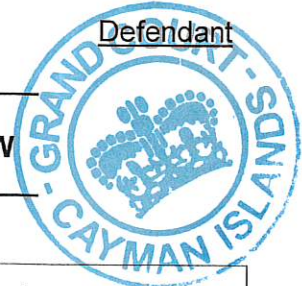
BETWEEN:

- (1) ERNST & YOUNG LTD
- (2) MAPLESFS LIMITED
- (3) KPMG
- (4) BUTTERFIELD BANK (CAYMAN) LIMITED



AND

THE INFORMATION MANAGER OF THE DEPARTMENT OF IMMIGRATION OF
THE CAYMAN ISLANDS GOVERNMENT



APPLICATION FOR LEAVE TO APPLY FOR JUDICIAL REVIEW

To the Clerk of the Court Law Courts, George Town, Grand Cayman, Cayman Islands	
Name, address and description of applicant(s)	Ernst & Young Ltd Suite 6401, 62 Forum Lane Camana Bay Grand Cayman Cayman Islands
	MaplesFS Limited PO Box 1093 Boundary Hall Cricket Square Grand Cayman KY1-1102 Cayman Islands
	KPMG PO Box 493 Century Yard Cricket Square Grand Cayman KY1-1106 Cayman Islands

	Butterfield Bank (Cayman) Limited PO Box 705 Butterfield House 68 Fort Street Grand Cayman KY1-1107 Cayman Islands
Judgment, Order, decision or other proceeding in respect of which relief is sought	Decision made by the Immigration Department, at a date not currently known by the Plaintiffs, to provide commercially sensitive and/or personal information (the " Information ") to the Cayman Compass pursuant to its request for records under section 7 of the Freedom of Information Law, 2007 (the " Decision ").
Relief Sought	
<ol style="list-style-type: none"> 1 An order of certiorari to quash the Decision. 2 A final prohibitive injunction against future disclosure by the Defendant of the Information (or any part thereof) to any person or entity external to the Defendant. 3 A mandatory injunction requiring the Defendant to provide to the Plaintiffs or to the Court a list of any and all persons or entities external to the Defendant to whom the Information has previously been disclosed by the Defendant. 	
Name and address of applicant's attorneys, or, if no attorneys acting, the address for service of the applicant	Maples and Calder of PO Box 309, Ugland House, South Church Street, George Town, Grand Cayman KY1-1104, Cayman Islands (Ref: MWI/LLK/KKW)
Signed: <i>Maples and Calder</i>	Dated: 30 January 2015

Grounds on Which Relief is Sought

- 1 **Illegality:** the decision maker misdirected itself in law by making the Decision.
- 2 **Unreasonableness/irrationality:** the Decision was plainly wrong and no reasonable decision-maker could have come to it.

Maples and Calder
Attorneys for the Plaintiffs