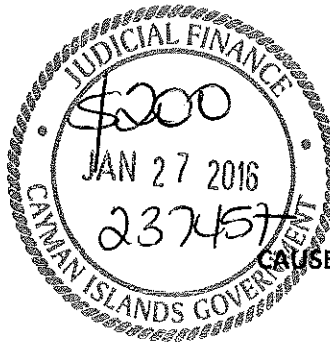


IN THE GRAND COURT OF THE CAYMAN ISLANDS



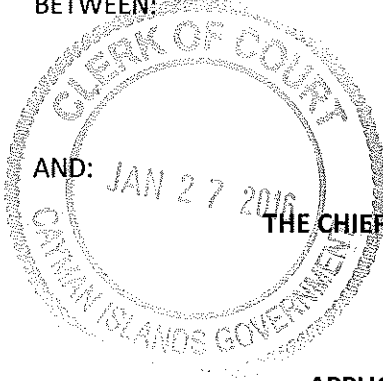
60011
CAUSE NO. OF 2016

BETWEEN:

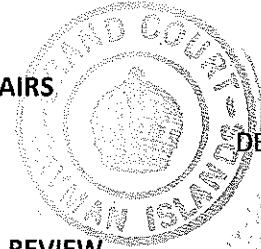
ADUKE NATALIE JOSEPH-CAESAR

PLAINTIFF

AND:



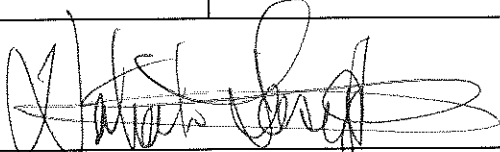
THE CHIEF OFFICER OF THE MINISTRY OF HOME AFFAIRS



DEFENDANT

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)	Aduke Natalie Joseph-Caesar 274 Berry Drive, Beach Bay, Bodden Town, PO Box 10970, KY1-1007 Deputy Director of Prisons
Judgment, order, decision or other proceeding in respect of which relief is sought	The disciplinary proceedings conducted by the Chief Officer which concluded with his decision, on 2 November 2015, to terminate the Plaintiff's employment.
Relief Sought	
1. A Declaration that the Chief Officer's application of the Public Service Management Law was illegal and void;	
2. A Declaration that the Chief Officer's termination decision was invalid, null and void and did not	

<p>terminate the Plaintiff's tenure as Deputy Director of Prisons;</p> <p>3. A Declaration that the Plaintiff is still engaged in the position of Deputy Director of Prisons until such time as she resigns or her tenure lawfully comes to an end;</p> <p>4. An Order for payment of arrears of salary and pension contributions since 2 November 2015;</p> <p>5. Such further and other relief as the Court may deem appropriate in all the circumstances; and</p> <p>6. Costs of these proceedings.</p>	
<p>Name and address of applicant's attorneys, or, if no attorneys acting, the address for service of the applicant</p>	<p>Samson & McGrath, Attorneys-at-Law 5th Floor, Genesis Building, PO 446 GT, Grand Cayman.</p>
<p>Signed</p> 	<p>Dated 27th January 2016</p>

GROUND ON WHICH RELIEF IS SOUGHT

Relief is sought because the Chief Officer acted illegally when he decided to, and did, conduct disciplinary proceedings with reference to the Public Service Management Law (2013) and the Personnel Regulations (2013).

Since the Plaintiff was a 'prison officer' as defined by the Prisons Law, any disciplinary proceedings should have been conducted by the Director of Prisons in accordance with the Prisons Law and with reference to the Prison Officers (Discipline) Regulations (1999).

Further particulars are contained in the attached draft Notice of Originating Motion and in the affidavit of Aduke Natalie Joseph-Caesar dated 27 January 2016 made in support of this application.

Dated the 27th January 2016
Filed the 2016

Samson & McGrath

Samson & McGrath
Attorneys-at-Law for the Plaintiff

TO: The Clerk of the Courts