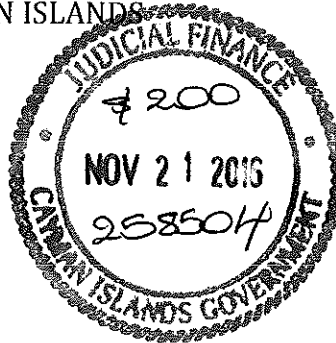


IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION



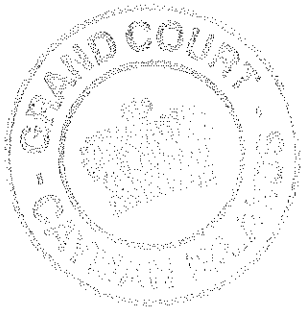
CAUSE NO. OF 2016
215
Plaintiff

BETWEEN: JOY DOUGLAS

AND

VINCE DALE WEBB AS TRUSTEE
OF LEONARD RANSDALE WEBB
VINCE DALE WEBB
EULALEE ADINA WEBB
LINFORD RAFAEL WEBB
EMILY MAE BODDEN
SALLY RAE BODDEN
SAMANTHA MELISSA BODDEN

1st Defendant
2nd Defendant
3rd Defendant
4th Defendant
5th Defendant
6th Defendant
7th Defendant



WRIT OF SUMMONS

TO: VINCE DALE WEBB AS TRUSTEE
OF LEONARD RANSDALE WEBB
of George Town, Grand Cayman

AND TO: VINCE DALE WEBB
of George Town, Grand Cayman

AND TO: EULALEE ADINA WEBB
of George Town, Grand Cayman

AND TO: LINFORD RAFAEL WEBB
of George Town, Grand Cayman

AND TO: EMILY MAE BODDEN
of George Town, Grand Cayman

AND TO: SALLY RAE BODDEN
of George Town, Grand Cayman

AND TO: SAMANTHA MELISSA BODDEN
of George Town, Grand Cayman



STATEMENT OF CLAIM

The Plaintiff and her son, Devin Alvin Douglas are joint proprietor of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66 ("the Plaintiff's Properties") A copy of the land register of Block 13D Parcels 65 and 66 are hereto attached.

The Defendants are proprietors of property registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcel 64 ("the Defendants' Property"). A copy of the land register for Block 13D Parcel 64 is hereto attached.

The Defendants, without the proper approval of the Cayman Islands Planning Authority and without the consent of the Plaintiff, have erected a buildings and a fence ("the Unauthorised Structures") on their Property which has encroached on the Plaintiff's Properties. A copy of the cadastral map showing the encroachment is hereto attached.

Despite several request by the Plaintiff to the Defendants to remove the Unauthorised Structures, the Defendants' have failed to remove the said structures.

On 31st July 2016, a fire ensued on one of the Defendants Unauthorised Structures on Block 13D Parcel 64 which gravely endangered the Plaintiff's dwelling home located on Block 13D Parcel 65.

On 22nd August 2016, the Plaintiff, by way of her attorney, made a formal request to the Defendants to remove the Unauthorised Structures. A copy of the letters to all the Defendants are hereto attached. The letters were all hand delivered and copies of the Mailfast delivery slips are hereto attached.

The Defendants have failed to remove the Unauthorised Structures as at the date of this Writ and are in breach of their duty as proprietors and are trespassers and as a result have caused damages to the Plaintiff. The Defendants are hindering the Plaintiff from quiet and peaceful enjoyment of the Plaintiff's Property.

AND THE PLAINTIFFS claims:

1. The Plaintiff claim is for the Defendants to remove the Unauthorised Structure from the Plaintiff's Property.
2. Costs; and
3. Further or other relief as the Court deems fit.

If within the time for returning the Acknowledgment of Service, the Defendant undertakes to vacate the Property further proceedings will be stayed.



Sonia Bush & Associates Law Firm
Attorneys for the Plaintiff



Joy Douglas
Plaintiff

DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICES
OF WRIT OF SUMMONS

1. The accompanying form of acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendants or by the Defendants if acting in person.

After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statements of Claim" appear on the top of page 2) the Defence must be served within 28 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgement is served on the Defendants.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 28 days after a Statement of Claim has been served on the Defendants.

If the Defendants fail to serve his defence within the appropriate time, the Plaintiff may enter judgement against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendants are unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance
Please complete overleaf

Notes for Guidance

1. Each Defendant (if there is more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 28 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Writ of Summons)"
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....) after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

Notes on address for service

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communication for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Indorsement by Plaintiff's Attorney (or by Plaintiff if suing in person) of his name, address and reference, if any, in the box below.

Sonia Bush & Associates Law Firm
Attorneys-at-Law
Grand Pavilion Commercial Center,
802 West Bay Road,
P.O. Box 11139
Grand Cayman, KY1-1008
Cayman Islands.

Indorsement by Defendant's Attorney (or by Defendant if suing in person) of his name, address and reference, if any, in the box below.

**CAYMAN ISLANDS
LAND REGISTER**

Edition 3
Opened 13 APR 2011

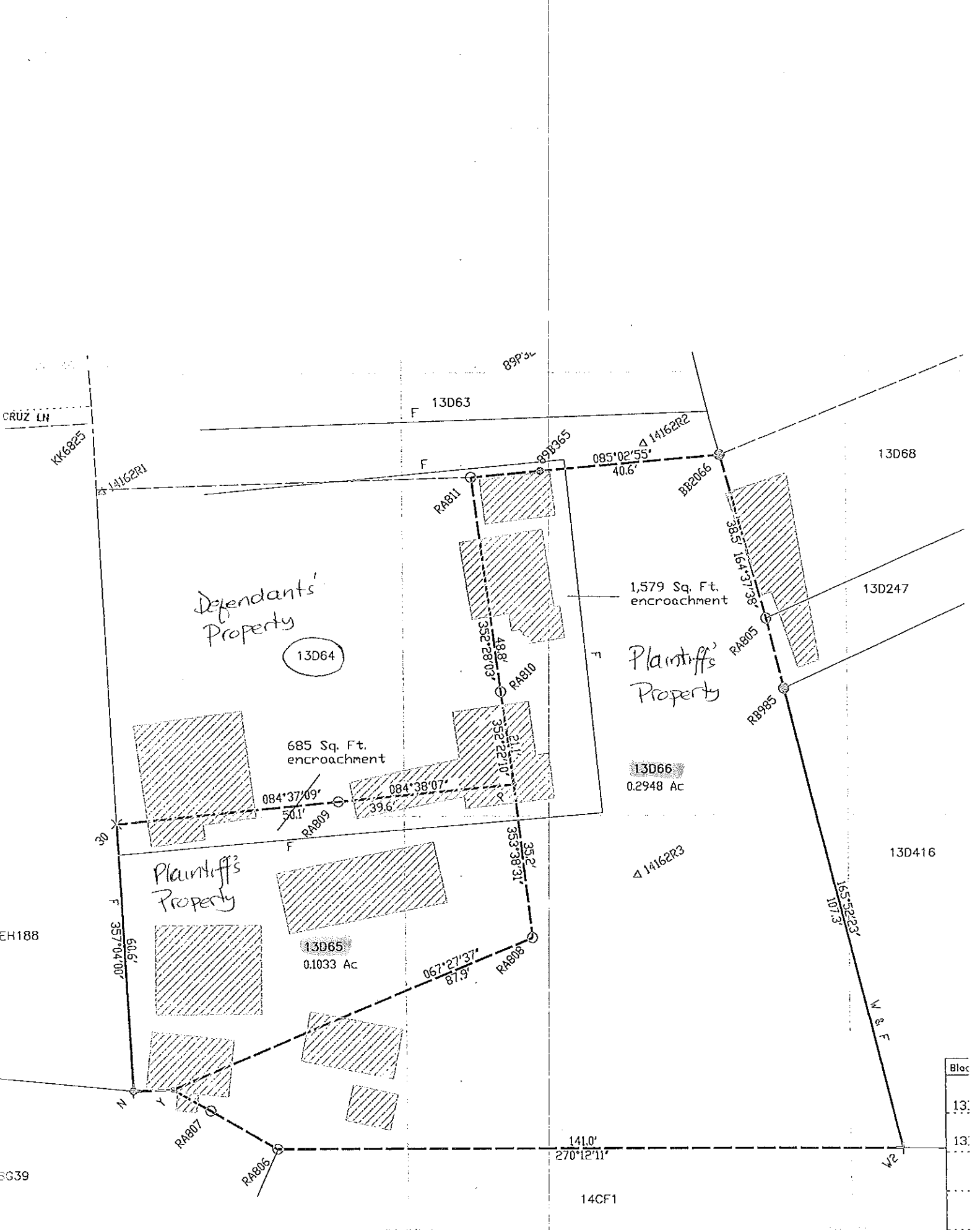
A - PROPERTY SECTION

L/R returned & destroyed 19/11/80.

ESTATE No. 4		DATE 09/04/11	INSTRUMENT No. 2819/11	APPLICANTS VINCE DALE WEBB, as Trustee, LEONARD RANSDALE WEBB, P.O. Box 1876 Grand Cayman KY1-1110, Cayman Islands; EULALIE ADINA WEBB, P.O. Box 1876, Grand Cayman KY1-1110, Cayman Islands; VINCE DALE WEBB, P.O. Box 1876, Grand Cayman KY1-1110, Cayman Islands; as joint proprietors	REGISTRAR'S No. 13D 54 Registration Section GEORGE TOWN CENTRAL Block and Parcel No. 13D 54 (Name of Parcel) Approx. area 0.15 Acre
Nature of title ABSOLUTE/PROVISIONAL		APPLICANTS			REGISTRAR'S No. 13D 54
Origin of title FIRST REGISTRATION 20-SEP-74 MUTATION No.		APPLICANTS			REGISTRAR'S No. 13D 54

B - PROPRIETORSHIP SECTION

ESTATE No.	DATE	INSTRUMENT No.	NAME AND ADDRESS OF PROPRIETORS	SIGNATURE OF REGISTRAR
4	09/04/11	2819/11	VINCE DALE WEBB, as Trustee, LEONARD RANSDALE WEBB, P.O. Box 1876, Grand Cayman KY1-1110, Cayman Islands; EULALIE ADINA WEBB, P.O. Box 1876, Grand Cayman KY1-1110, Cayman Islands; VINCE DALE WEBB, P.O. Box 1876, Grand Cayman KY1-1110, Cayman Islands; as joint proprietors	H Lingard
5	05/04/11	2820/11	LINFORD RAFAEL WEBB, EMILY MALE BODDEN, SALLY RAE BODDEN, SAMANTA MELISSA BODDEN, P.O. Box 1314, Grand Cayman KY1-1106, Cayman Islands; as joint proprietors	H Lingard



CRUZ LN

EH188

EG39

Defendants' Property

Plaintiff's Property

Plaintiff's Property

13D64

13D65
0.1033 Ac

13D66
0.2948 Ac

685 Sq. Ft. encroachment

1,579 Sq. Ft. encroachment

14162R1

F 13D63

F

085°02'55"
40.6'

13D68

13D247

13D416

30'

F 357°04'00"
60.6'

084°37'09"
50.1'

084°38'07"
39.6'

067°27'37"
87.9'

RA808

RA809

RA810

RA811

N

Y

RA807

RA806

141.0'
270°12'11"

14CF1

14162R3

14162R2

165°52'23"
107.3'

N & E

1/2

Bloc

13:

13:

CADASTRAL

I, Greg. Abernethy, hereby certify that I have executed this survey



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Mr. Vince Dale Webb
as Trustee for Leonard Ransdale Webb
P.O. Box 1876, Grand Cayman,
KY1-1110, Cayman Islands

BY HAND

Dear Mr. Webb,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

We note that the proprietorship of adjoining property which is registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcel 64 is divided in two equal shares. One ½ share is owned by Vince Dale Webb as Trustee for Leonard Ransdale Webb along with Eulalee Adina Webb and Vince Dale Webb as joint proprietors and the other ½ share is owned by Linford Rafael Webb, Emily Mae Bodden, Sally Rae Bodden and Samantha Melissa Bodden as joint proprietors. A copy of the land register is attached for your ease of reference.

We are instructed that buildings which are erected on property Block 13D Parcel 64 have extended and encroached on our Client's property without authorisation. Our Client have asked your several times to remove your structures from her property and you have ignored her. She expensed herself recently to carry out a survey to prove to you that you are encroaching on her property and again you have ignored her.


We are also instructed that these buildings have been erected without the proper permission of the Cayman Islands Planning Authority. We are instructed that, should the need arises, to send a copy of this letter to the Planning Authority to seek their assisting in removing the unauthorised structures. A copy of a map showing the extent of encroachment is attached for your ease of reference.

We are further instructed that on 31st July 2016, one of the buildings on Block 13D Parcel 64 which has encroached on our Client's property was damaged by fire. This caused extensive risk to our Client's dwelling home. In addition, we are instructed that immediately after the fire, a fence was erected which is encroaching on our client's property.

We now formally inform you that you have erected buildings and a fence on your property which are encroaching on our Client's property. You have not obtained permission from our Client and neither from the Planning Authority. You are therefore in breach of the Registered Land Law and the Planning Authority regulations. You are therefore instructed to remove the buildings and the fence which are encroaching on our Client's property within 14 days of the receipt of this letter. Should you fail to remove the encroaching structures, we have full instructions to issue legal proceedings against you and will indeed seek costs and damages against you.

As you may have already know, our Client is a widow and is over the age of a senior citizen. She instructs us that she is under severe grief and that your conducts are causing her immense distress.

Please confirm when you have removed the structures.



Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Ms. Eulalee Adina Webb
P.O. Box 1876, Grand Cayman,
KY1-1110, Cayman Islands

BY HAND

Dear Ms. Webb,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

We note that the proprietorship of adjoining property which is registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcel 64 is divided in two equal shares. One ½ share is owned by Vince Dale Webb as Trustee for Leonard Ransdale Webb along with Eulalee Adina Webb and Vince Dale Webb as joint proprietors and the other ½ share is owned by Linford Rafael Webb, Emily Mae Bodden, Sally Rae Bodden and Samantha Melissa Bodden as joint proprietors. A copy of the land register is attached for your ease of reference.

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Please confirm when you have removed the structures.



Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Mr. Linford Rafael Webb
P.O. Box 1314, Grand Cayman,
KY1-1106, Cayman Islands

BY HAND

Dear Mr. Webb,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

We note that the proprietorship of adjoining property which is registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcel 64 is divided in two equal shares. One ½ share is owned by Vince Dale Webb as Trustee for Leonard Ransdale Webb along with Eulalee Adina Webb and Vince Dale Webb as joint proprietors and the other ½ share is owned by Linford Rafael Webb, Emily Mae Bodden, Sally Rae Bodden and Samantha Melissa Bodden as joint proprietors. A copy of the land register is attached for your ease of reference.

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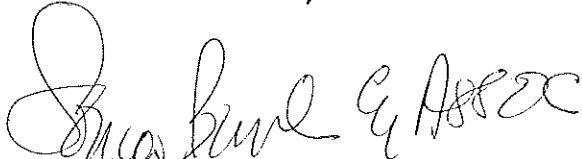
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Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Ms. Emily Mae Bodden
P.O. Box 1314, Grand Cayman,
KY1-1106, Cayman Islands

BY HAND

Dear Ms. Bodden,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

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Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Ms. Sally Rae Boden
P.O. Box 1314, Grand Cayman,
KY1-1106, Cayman Islands

BY HAND

Dear Ms. Bodden,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

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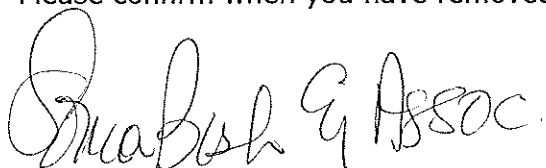
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Please confirm when you have removed the structures.



Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com



ATTORNEYS-AT-LAW &
NOTARY PUBLIC

22nd August 2016

Ms. Samantha Melissa Bodden
P.O. Box 1314, Grand Cayman,
KY1-1106, Cayman Islands

BY HAND

Dear Ms. Bodden,

Re: Property Block 3D Parcel 64 and 65 – Mrs. Joy Douglas

We act for and on behalf of Mrs. Joy Douglas ("our Client"). Our Client is the legal title owner of properties registered on the Cayman Islands land register as Registration Section George Town Central Block 13D Parcels 65 and 66.

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Please confirm when you have removed the structures.



Yours sincerely,

SONIA BUSH & ASSOCIATES

ATTORNEYS AT LAW

Direct Phone: 1345769-5002

Fax: 1345769-5001

Email: sbush@soniabush.com

MAILFAST SERVICES

express link

P.O. Box 410, Grand Cayman KY1-1106, Cayman Islands
 Tel: (345) 916-1685, Tel/Fax: (345) 949-2879
 Email: mailfast1960@gmail.com

DATE	SHIPPER'S ACC. #	AIRBILL #	YOUR REFERENCE #	MESSSENGER
08/16		21535		
SHIPPER		CONSIGNEE		
Eric Bush & Assoc.		Ms. Sally Rae Borden		
PHONE		As call by Douglas for		
		directions 324-1767		
SERVICE	CHARGE	SAME DAY	OVERNIGHT	CONSIGNEE'S SIGNATURE
				Sally Borden
SPECIAL INSTRUCTIONS				
Letter dated 08/16.				
TOTAL CHARGES	SHIPPER'S SIGNATURE	COURIER'S SIGNATURE	WEIGHT / PIECES	
050	EB	SE		
WHITE: SHIPPER				
WHITE: DESTINATION				
YELLOW: STATION				
BLUE: CONSIGNEE				

MAILFAST SERVICES

express link

P.O. Box 410, Grand Cayman KY1-1106, Cayman Islands
 Tel: (345) 916-1685, Tel/Fax: (345) 949-2879
 Email: mailfast1960@gmail.com

DATE	SHIPPER'S ACC. #	AIRBILL #	YOUR REFERENCE #	MESSSENGER
		22976		
SHIPPER		CONSIGNEE		
Eric Bush + Associates		Ms. Sally Rae Borden		
PHONE		call by Doug Douglas for directions		
		324-1767		
SERVICE	CHARGE	SAME DAY	OVERNIGHT	CONSIGNEE'S SIGNATURE
				Sally Borden
SPECIAL INSTRUCTIONS				
Letter delivered on 22 Aug 16				
TOTAL CHARGES	SHIPPER'S SIGNATURE	COURIER'S SIGNATURE	WEIGHT / PIECES	
050	EB	SE		
WHITE: SHIPPER				
WHITE: DESTINATION				
YELLOW: STATION				
BLUE: CONSIGNEE				

MAILFAST SERVICES expresslink

P.O. Box 410, Grand Cayman KY1-1106, Cayman Islands
Tel: (345) 916-1685, Tel/Fax: (345) 949-2879
Email: mailfast1960@gmail.com

DATE 20/8/16	SHIPPER'S ACC.#	AIRBILL # 21538	YOUR REFERENCE #	MESSENGER
SHIPPER Sonia Bunt & Assoc				
SERVICE		CHARGE	SAME DAY	OVERNIGHT
SPECIAL INSTRUCTIONS		LETTER 20/8/16		
SHIPPER'S SIGNATURE		COURIER'S SIGNATURE		
WHITE: SHIPPER		WHITE: DESTINATION		
YELLOW: STATION		BLUE: CONSIGNEE		
P.O.D.		CONSIGNEE'S SIGNATURE		
PRINT NAME		DATE & TIME		
WEIGHT / PIECES				
CONSIGNEE Kindford Webb call dog for directions 324-1767		PHONE		
TOTAL CHARGES 4500				

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DATE 20/8/16	SHIPPER'S ACC.#	AIRBILL # 21537	YOUR REFERENCE #	MESSENGER
SHIPPER Sonia Bunt & Assoc.				
SERVICE		CHARGE	SAME DAY	OVERNIGHT
SPECIAL INSTRUCTIONS		LETTER dated 20/8/16		
SHIPPER'S SIGNATURE		COURIER'S SIGNATURE		
WHITE: SHIPPER		WHITE: DESTINATION		
YELLOW: STATION		BLUE: CONSIGNEE		
P.O.D.		CONSIGNEE'S SIGNATURE		
PRINT NAME		DATE & TIME		
WEIGHT / PIECES				
CONSIGNEE Vince Webb as Trustee call dog for directions 324-1767		PHONE		
TOTAL CHARGES 4500				

WHITE: SHIPPER WHITE: DESTINATION YELLOW: STATION BLUE: CONSIGNEE

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DATE	SHIPPER'S ACC.#	AIRBILL #	YOUR REFERENCE #	MESSENGER	
20/8/16		21538			
SHIPPER	Sonia Bush & Assoc		CONSIGNEE	Eulalie Webb	
	PHONE			call Joy for direction - 394-1967	
SERVICE	CHARGE	SAME DAY	OVERNIGHT	PO.D.	CONSIGNEE'S SIGNATURE
				ms	
SPECIAL INSTRUCTIONS			letters dated 20/8/16		
TOTAL CHARGES	\$5.00	SHIPPER'S SIGNATURE	COURIER'S SIGNATURE	PRINT NAME	DATE & TIME
WHITE: SHIPPER			WHITE: DESTINATION	YELLOW: STATION	BLUE: CONSIGNEE

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DATE	SHIPPER'S ACC.#	AIRBILL #	YOUR REFERENCE #	MESSENGER	
20/8/16		21539			
SHIPPER	Sonia Bush & Assoc		CONSIGNEE	Vince Webb	
	PHONE			call Jay for direction - 394-1967	
SERVICE	CHARGE	SAME DAY	OVERNIGHT	PO.D.	CONSIGNEE'S SIGNATURE
				ms	
SPECIAL INSTRUCTIONS			letters dated 20/8/16		
TOTAL CHARGES	\$5.00	SHIPPER'S SIGNATURE	COURIER'S SIGNATURE	PRINT NAME	DATE & TIME
WHITE: SHIPPER			WHITE: DESTINATION	YELLOW: STATION	BLUE: CONSIGNEE

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 Email: maifast1960@gmail.com

DATE 29/8/16	SHIPPER'S ACC. #	AIRBILL # 21540	YOUR REFERENCE #	MESSENGER
SHIPPER Sonic Bulk & Assoc.			CONSIGNEE Samantha Batten Call Jay for directions. 384-1767.	
SERVICE	CHARGE	SAME DAY	OVERNIGHT	PHONE
SPECIAL INSTRUCTIONS Ltr dated 29/8/16.		P.O.D. CONSIGNEE'S SIGNATURE		
SHIPPER'S SIGNATURE		PRINT NAME		
COURIER'S SIGNATURE		DATE & TIME		
TOTAL CHARGES 45.00		WEIGHT / PIECES		

WHITE: SHIPPER WHITE: DESTINATION YELLOW: STATION BLUE: CONSIGNEE